

Sustainability Appraisal (SA) for the Portsmouth Local Plan

SA Report to accompany Regulation 19 consultation

Portsmouth City Council

March 2024

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Quality information

Prepared by	Checked by	Verified by	Approved by
CB: Principal Environmental Planner	NCB: Technical Director	IM: Associate Director	IM: Associate Director
EH: Environmental Planner			

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Prepared for:

Portsmouth City Council

Prepared by:

AECOM Limited
 3rd Floor, Portwall Place
 Portwall Lane
 Bristol BS1 6NA
 United Kingdom

T: +44 117 901 7000
 aecom.com

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1. Introduction

- 1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Portsmouth Local Plan. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹

SA explained

- 1.2 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).²
- 1.3 In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the Draft Plan that essentially “*identifies, describes and evaluates*” the likely significant effects of implementing “*the plan, and reasonable alternatives*”.³ The report must then be considered, alongside consultation responses, when finalising the plan.
- 1.4 More specifically, the SA Report should answer the following three questions⁴:
1. What has Plan-making / SA involved up to this point? (Including in relation to 'reasonable alternatives')
 2. What are the SA findings at this stage? (i.e., in relation to the Draft Plan)
 3. What happens next? (What steps will be taken to finalise (and monitor) the plan)

This SA Report

- 1.5 This SA Report is published alongside the Pre-Submission Portsmouth Local Plan, under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. A Non-Technical Summary is available separately. This report seeks to answer each of the three SA questions (para 1.4) in turn, with a discrete ‘part’ of the report dedicated to each.
- 1.6 Before answering Question 1, two initial questions are answered to provide further context: i) What is the Local Plan trying to achieve? and ii) What is the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012) and subsequent revisions (2023). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document. Where legislation is referenced, it should be assumed it is ‘as amended’.

² The SA process incorporates the SEA process. Indeed, SA and SEA are one and the same process, differing only in terms of substantive focus. SA has an equal focus on all three ‘pillars’ of sustainable development (environment, social and economic).

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

⁴ See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

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2. What is the Local Plan seeking to achieve?

2.1 This chapter of the report sets out the vision and objectives for the Local Plan. Once adopted, the Portsmouth Local Plan will set out the framework to guide and shape development in Portsmouth up to 2040. It will replace the Portsmouth Plan (Portsmouth Core Strategy) adopted in 2012, the two Area Action Plans for Somerstown and North Southsea (2012) and Southsea Town Centre (2007), and the saved policies from the Portsmouth City Local Plan (2006).

Local Plan vision

2.2 The Portsmouth Local Plan seeks to achieve the Imagine Portsmouth 2040 Vision⁵ which was adopted in 2021:

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

Strategic objectives

2.3 Six strategic objectives have been developed from this high-level vision, and the objectives are considered to be the stepping stones between the vision and the Local Plan policies. The six objectives are:

- **A healthy and happy City:** We do everything we can to enhance wellbeing for everyone in our city by offering the education, care and support that every individual needs for their physical and mental health. All our residents and communities live in good homes where they feel safe, feel like they belong, and can thrive.
- **A City rich in culture and creativity:** People in Portsmouth enjoy a vibrant cultural scene that makes the most of our location, our heritage, and our creative energy. We are full of things to do and places to be, welcoming locals and visitors with diverse events, attractions and venues that positively benefit our people and our City. We are known locally, regionally, and internationally as a great waterfront and City destination that brings people together.
- **A City with a thriving economy:** Portsmouth supercharges local businesses and entrepreneurs and attracts investment nationally and internationally from businesses of all sizes. We build strong partnerships between employers and people to develop an excellent skills base and offer brilliant career opportunities to young people, students and adults, growing a better future for us all.
- **A City of lifelong learning:** Our young people are encouraged to develop high, positive aspirations, and are fully invested in to make the most of their

⁵ [Imagine Portsmouth 2040 Vision](#)

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talent and potential. Adults have a wide range of education opportunities to choose from at every stage of life that empower them and enrich their lives.

- **A green City:** We have excellent air quality because of our green spaces and sustainable transport, and this means our people live healthy and active lives. We are carbon neutral, use renewable energy and actively work to address climate change. We protect and enhance both our land and maritime environment for future generations.
- **A City with easy travel:** Fewer journeys are made by car because we have excellent public transport connections between bus, train, cycling and walking routes, making it easier and more enjoyable to be out and about. We encourage and support more walking and cycling, and we make it easy for people to travel regionally, nationally and internationally for work and pleasure.

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3. What is the scope of the SA?

- 3.1 The aim here is to introduce the reader to the scope of the SA, i.e., the sustainability issues/objectives that should be a focus of (and provide a broad methodological framework for) the SA.
- 3.2 Further information on the scope of the SA - i.e., a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in **Appendix B**.

Consultation on the scope

- 3.3 The Environmental Assessment of Plans and Programmes Regulations 2004 require that "*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e., the SA scope], the responsible authority shall consult the consultation bodies*". In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.⁶ As such, these authorities were consulted on the SA scope in 2017. Since that time, the SA scope has evolved as new evidence has emerged; however, the underlying scope remains fundamentally the same as that agreed through the dedicated scoping consultation in 2017. It should be noted that updated scoping information is presented in **Appendix B** of this SA Report.

SA framework

- 3.4 **Table 3.1** presents the SA framework.

⁶ In accordance with Article 6(3), of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

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Table 3.1: SA framework

SA Objective	Assessment Criteria	Potential Indicators
SA-1: Building a strong, competitive economy in Portsmouth SA themes; <i>Population</i> <i>Human Health</i>	Will it provide new employment floorspace?	– Amount of new employment floorspace
	Will it tackle income/employment deprivation and promote social equity?	– Amount of vacant employment space
	Will it help with diversification of the economy?	– Reduction in unemployment levels
	Will it provide learning, training and skills?	– Employment per economic sector
	Will it support tourism?	– Improvement in educational attainments – Amount of visitor spend – Business start ups
SA-2: Ensuring the vitality of the city centre and other town centres in Portsmouth SA themes; <i>Population</i> <i>Human Health</i> <i>Material Assets</i>	Will it contribute to the vitality of city, town, District and Local Centres?	– New retail/leisure/office development in the centres
	Will it create new retail / leisure / employment / housing / office development in the city centre?	– Change in Portsmouth's position in the national retail rankings
		– Reduction in retail vacancy rates in the city centre and other key centres
SA-3: Promoting sustainable transport in Portsmouth SA themes; <i>Air</i> <i>Climatic Factors</i> <i>Human Health</i> <i>Population</i>	Will it have easy and safe access from homes to shops and services?	– Achieving a modal shift and decrease in commuter car use in the city
	Will it reduce air pollution?	– Decrease in amount of and/or severity of AQMAs
	Will it encourage walking and cycling to create a healthier city?	– Increase in new cycle routes
	Will it encourage public transport?	
SA-4: To tackle climate change, flooding and coastal change in Portsmouth SA themes; <i>Population</i> <i>Human Health</i> <i>Climatic Factors</i> <i>Water</i> <i>Material Assets</i>	Will it include climate change mitigation or adaptation measures?	– Decrease in Portsmouth's greenhouse gas emissions
	Will it contribute to coastal flood risk mitigation measures?	– Planning applications approved in accordance with climate change mitigation or adaptation related policies
	Will it include surface water management and/or water consumption and efficiency measures?	– Achievement of BREEAM Excellent
		– Progress on flood defences being built – No change or reduction in the level of water stress
SA-5: Delivering high quality homes in Portsmouth SA themes; <i>Population</i> <i>Human Health</i> <i>Material Assets</i>	Will it provide homes to meet the diverse housing needs of the city?	– Proportions of housing types
	Will the needs of the ageing population be taken account of?	– Amount of homes suitable for or capable of adaptation to elderly/disabled use
	Will this help replace poor quality housing stock?	– Redevelopment or improvements/upgrading old housing stock – Amount of homes that meet or exceed the minimum space standards

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Does it provide homes that meet minimum space standards?

<p>SA-6: To promote healthy communities</p> <p>SA themes; <i>Air</i> <i>Human Health</i> <i>Population</i></p>	<p>Will it have/improve access to health and community facilities and other services?</p> <p>Will it improve access to open space and/or healthy lifestyles?</p> <p>Will it benefit deprived communities?</p> <p>Will it help reduce crime?</p>	<ul style="list-style-type: none"> - Distance to facilities - The amount of super output areas in Portsmouth - The amount of residents classified as obese or excess weight - New layouts designed to Design Out Crime standards
<p>SA-7: Conserving and enhancing the historic townscape</p> <p>SA themes; <i>Cultural Heritage</i> <i>Material Assets</i></p>	<p>Will it protect and enhance the historic/ cultural townscape and assets?</p> <p>Will it provide for increased access to and understanding and enjoyment of the historic environment?</p>	<ul style="list-style-type: none"> - The number and proportion of heritage assets and Conservation Areas on the Historic England Heritage at Risk Register - Buildings of historic interest given a new use/restored
<p>SA-8: Requiring good urban design in Portsmouth</p> <p>SA themes; <i>Human Health</i> <i>Material Assets</i></p>	<p>Will it secure good urban design?</p>	<ul style="list-style-type: none"> - The amount of Planning Applications refused on urban design terms - The amount of tall buildings refused for being outside the areas of opportunity for tall buildings - Any new developments winning an urban design award
<p>SA-9: Conserving and enhancing the natural environment in Portsmouth</p> <p>SA themes; <i>Biodiversity</i> <i>Fauna</i> <i>Flora</i> <i>Material Assets</i> <i>Landscape</i> <i>Soil</i> <i>Water</i></p>	<p>Will it protect and/or enhance the local ecological systems?</p> <p>Will it protect and/or enhance green infrastructure and/or open spaces in the city?</p>	<ul style="list-style-type: none"> - Loss of greenspace/increase in greenspace - Condition of SPAs and SSSIs in Portsmouth - Any schemes to enhance biodiversity - Creation of pocket parks on schemes of 50 plus homes
<p>SA-10: Facilitating the sustainable use of natural resources in Portsmouth</p> <p>SA themes; <i>Human Health</i> <i>Climatic Factors</i> <i>Population</i> <i>Landscape</i></p>	<p>Will it contribute to reducing waste generation and/or diverting waste from landfill?</p> <p>Will it contribute to the reuse / recycling of minerals resources?</p> <p>Will it avoid unnecessary sterilisation of safeguarded minerals and waste infrastructure or mineral resources, or encroachment from incompatible land uses?</p>	<ul style="list-style-type: none"> - Arisings, treatment and movement of waste - Secondary and recycled aggregate capacity/ sales - Planning applications granted contrary to an objection from HCC on minerals and waste infrastructure or mineral resource safeguarding grounds

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Part 1: What has plan-making/ SA involved to this point?

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4. Introduction (to Part 1)

- 4.1 In line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then considered the appraisal findings when finalising the Local Plan.
- 4.2 This part of the report presents information regarding the consideration of reasonable alternatives, with alternatives explored in relation to both the spatial strategy and policy framework. This information is important given regulatory requirements.⁷
- 4.3 This report builds upon the SA work already undertaken to explore alternatives at the Issues and Options stage (2017) and the Regulation 18 'draft plan' stage, which was consulted upon in 2021. This followed consultation on Local Plan evidence base and on the Tipner Strategic Development Area, both in 2019. Alternatives work at this stage will also consider feedback from consultations, and the subsequent changes made to the emerging plan.

Structure of this part of the report

- 4.4 This part of the report is structured as follows:
- **Chapter 5** – presents the reasons for selecting the alternatives dealt with at this stage.
 - **Chapter 6** – presents a summary of the appraisal of the alternatives, and
 - **Chapter 7** – explains the Council's reasons for selecting the preferred approach when considering the alternatives explored.

⁷ There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.

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5. Establishing reasonable alternatives

- 5.1 This chapter explains how the policy context and evidence base was drawn on to establish reasonable alternatives for appraisal and then consultation at this Regulation 19 stage of plan-making. Ultimately, the aim of this chapter is to present “*an outline of the reasons for selecting the alternatives dealt with*”, in accordance with regulatory requirements.
- 5.2 It should be noted that alternatives have been previously identified and assessed through the SA process. Options were explored in the:
- Issues and Options SA Report (2017) accompanying the Portsmouth Local Plan Issues and Options document for consultation in 2017; and
 - Interim SA Report (2021) accompanying the Regulation 18 draft Local Plan for consultation in 2021.
- 5.3 This latest iteration of the SA does not repeat any alternatives assessment undertaken to date, but rather seeks to identify how options have developed since previous appraisals and incorporate feedback from consultation.
- 5.4 This chapter is structured under the following questions:
- How much growth needs to be delivered?
 - Where could growth be located?
 - Are there additional considerations for future growth? and
 - What reasonable alternatives can be identified at this stage?

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How much growth needs to be delivered?

- 5.5 This sub-section explores housing growth needs, affordable housing needs, and employment needs, before summarising the key changes and progression since the Interim SA Report (2021).

Housing needs

- 5.6 A Housing and Economic Development Needs Assessment (HEDNA) was completed to inform the Regulation 19 Local Plan. This study aims to provide evidence with regards to housing and employment land needs and requirements, and related policy.
- 5.7 Housing needs to date have been calculated using the Standard Method as set out in the National Planning Policy Framework (NPPF). The HEDNA identifies that, using the Government's Standard Method, the calculated housing need for Portsmouth is 899 new dwellings per annum and this would "*appear to be at the very upper end of any reasonable analysis of housing need in the city.*" This calculation is based on household growth for the 2023-33 period shown by 2014-based household projections and an affordability uplift of 21% to reflect the affordability ratio of 7.31.
- 5.8 Planning practice guidance notes that an Authority can move away from the Standard Method where there are exceptional circumstances. The HEDNA recognises that population growth has been less than projected by 2014-based projections and analysis of past housing completions do not point to lower growth due to reduced housing delivery. It indicates that trend-based projections would be expected to show lower growth and a lower housing need. However, this is not a trend unique to Portsmouth, and an analysis of Patient Register data indicates population increases higher than those reported by ONS. On this basis, it is deemed that the data does not sufficiently point to 'exceptional circumstances' in Portsmouth, but other methods of calculating housing need tend to indicate a lower need (e.g., projections based on birth and death rates and migration information suggests an annual need for 543 new dwellings, or 655 dwelling per annum factoring in an affordability uplift).
- 5.9 Following the recommendations of the HEDNA, the Council are progressing with the Standard Methodology calculation estimating a need for **899 new dwellings per annum**, whilst monitoring any new releases of relevant data.

Affordable housing needs

- 5.10 The link between affordable housing need and overall need (of all tenures) is complex and in trying to make a link it is important to recognise that many people identified with affordable housing needs are already in housing (and therefore do not generate a net additional need for a home).
- 5.11 The HEDNA has investigated affordable housing needs split between a need for social/ affordable rented accommodation (based on households unable to buy or rent in the market) and the need for affordable home ownership (including those who can afford to rent privately but cannot afford to buy a home). When looking at needs from households unable to buy or rent in Portsmouth, the evidence suggests a need for 851 affordable homes per annum across the city. This does not require the Council to increase the Local

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Plan housing requirement due to affordable needs but does suggest that the City Council should maximise the delivery of affordable housing at every opportunity.

- 5.12 When looking at affordable rented accommodation, analysis suggests a need for both social and affordable rented housing. However, with social rents being more affordable (benefiting a wider range of households), the HEDNA recommends that social rents be prioritised where delivery does not prejudice the overall delivery of affordable homes.
- 5.13 When looking at affordable home ownership the analysis is less conclusive about the scale of the need but does recognise that it is lower than social and affordable renting needs. In terms of the type of affordable home ownership, the HEDNA recommends the prioritisation of shared ownership schemes over First Homes (for which there is little evidence of genuine need).

Specialist housing needs

- 5.14 With regards to other housing needs, there is a notable student population attending the University of Portsmouth that has distinct housing needs. The city has seen significant private sector development of PBSA (Purpose Built Student Accommodation) in recent years, but the HEDNA identifies that in the 2022/23 academic year some 42% of students reside in HMOs (Houses of Multiple Occupation), higher than the national average of 27%. Moreover, the HEDNA identifies that this supply is rapidly falling and affordability worsening. With the University continuing with planned growth (of a minimum of 10% over the next three to four years) in the context of a falling supply of HMOs and local affordability issues, the HEDNA recommends that the Council support further PBSA development with affordable housing elements.
- 5.15 Additionally, in the context of an ageing population there is a continued need to support specialist C2 accommodation. The HEDNA forecasts a 39% increase in the population aged 65+ between 2021 and 2040, alongside a 49% increase in the number of people aged 65+ with dementia and a 45% increase in those aged 65+ with mobility problems. The HEDNA indicates a need for 770 additional housing units with care split between market and affordable housing and a need for additional residential and nursing care bedspaces.
- 5.16 ORS completed an updated Gypsy and Traveller Accommodation Assessment (GTAA) in 2023 which has identified no additional pitch needs within Portsmouth in the period up to 2040. Despite this, it does recognise the need to continue a criteria-based policy approach to gypsy and traveller development needs in order to address any need associated with windfall applications, immigration, or from households currently living in bricks and mortar.

Employment land needs

- 5.17 The HEDNA states that the Portsmouth economy is effectively an island economy and therefore has land development constraints. Recognising it is home to a university, the Royal Navy at Portsmouth Naval Base, and the Portsmouth International Port, the HEDNA identifies that the city has above average levels of employment in the health, manufacturing, and public administration and defence sectors.

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5.18 Overall, the HEDNA identifies that the city should be planning for an additional 6,800 to 7,300 new jobs in the period up to 2040. A range between an additional 42,500sqm to 61,700sqm is suggested for office development and the need for industrial ranges from a loss of 42,800sqm to a need for an additional 96,300sqm. For office development the lower end of the range assumes greater levels of working from home in the future where the focus is expected to be on higher quality employment space that draws staff back into the office post pandemic. For industrial development the upper end reflects adjustments to the sectors which operate in a range of factories and warehouses including higher quality premises suitable for advanced and marine technology and manufacturing. The HEDNA preferred scenario is to plan for around 42,500sqm of office space, and 96,300sqm for industrial and warehousing.

Changes since last consultation

- 5.19 The housing need figure remains broadly the same as that consulted on at the Regulation 18 stage (2021), at 899 new dwellings per annum compared to 872 new dwellings previously. Affordable housing needs have been better defined at this stage and, whilst these needs do not affect the overall need figure, it will influence policy directions relating to the delivery of affordable housing as part of future housing growth.
- 5.20 The HEDNA has provided a more up-to-date and localised assessment of employment land needs and indicates a lower need for both office space and industrial land than the 2021 PfSH Economic, Employment, and Commercial (including logistics) Needs Study⁸ (which was the evidence used to inform Regulation 18 consultation stage). The Council are continuing to promote employment development locations that have been progressed to date and will provide policy protections for existing employment premises/land that is fit for purpose. The HEDNA states that “*the proposed strategic and non-strategic allocations are considered appropriate*”, whilst noting that Lakeside will need to demonstrate a high-quality offer to attract occupation over the plan period.
- 5.21 Another change that impacts the growth trajectory is an extended plan period in the pre-submission version of the plan, which now covers a 20-year period (rather than 18 years as previously drafted) from 2020 to 2040.

⁸ [Economic, Employment and Commercial Needs \(including logistics\) Study Final Report](#)

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Where could growth be located?

5.22 This sub-section explores the potential locations across the city that could accommodate growth, focusing on key sub-areas, site options emerging, and opportunities for regeneration and intensification.

Housing and Economic Land Availability Assessment (HELAA)

5.23 The HELAA details the Council's assessment of potential housing and employment sites deemed either developable or deliverable across the city and is the main evidence-based study on land supply. The HELAA (alongside development monitoring data and other sources) demonstrates a forecasted total housing supply of 13,603 new homes over the plan period, which is an annualised figure of around 680 new homes a year. It demonstrates that Portsmouth cannot meet its need as calculated by the Standard Methodology due to its constrained island geography. All of the sites assessed as suitable, achievable, and available in the HELAA are allocated or identified in the Local Plan for housing, employment or mixed use development.

5.24 All HELAA sites have been subject to a high-level SA GIS analysis, against broad indicators identified under the each of the SA topics. This analysis was originally undertaken to inform the Interim SA Report (2021) and has now been updated in line with the most recent HELAA. The methodology and results of this assessment are provided in **Appendix C**. It is important to note that this assessment does not indicate the potential for 'significant effects', it is a high-level quantitative analysis that can be used to inform the more detailed or qualitative assessment of options that are being developed.

Potential growth locations

5.25 All the growth locations explored in the Interim SA Report that were identified as having little to no potential for growth continue to be discounted at this stage (see the [Interim SA Report](#) (2021) for detailed reasoning).

5.26 Growth locations that continue to be a focus for the Local Plan are explored in turn below, with a discussion around the progression of these options since Regulation 18 consultation.

Tipner East and Tipner West and Horsea Island East sites

5.27 In the Regulation 18 Local Plan there was a single allocation for Tipner. This was separated out in the Pre-Submission Plan to two sites, namely Tipner East and Tipner West & Horsea Island East. Following feedback at Regulation 18 consultation, the proposed scale of development at the Tipner West and Horsea Island East site has been substantially reduced. A new scheme is proposed which largely focuses on delivering a marine employment hub of 58,000sqm alongside a new bridge, new flood management measures, shops, a new meeting place, and 814 to 1,250 new homes (down from approximately 3,500-4,000 new homes previously). This scheme will also deliver significant land remediation works.

5.28 This area is expected to form a new gateway to the city along with Tipner East providing a new public transport hub (including Park & Ride) and new sea

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defences. Tipner East at the time of the last consultation had permission for 626 dwellings and it was expected that this would be uplifted. There is now permission for 1,056 new homes at Tipner East. New open space covering 64 hectares is allocated under a separate policy at Horsea Island.

- 5.29 The strategic allocation at Tipner West and Horsea Island East site has been assessed through the accompanying Habitats Regulations Assessment (HRA). Following Appropriate Assessment, the HRA cannot rule out an adverse effect on the integrity of the national and internationally designated biodiversity sites. Nonetheless, the proposal is being progressed on the basis that it meets the three legal tests for derogation (there are no feasible alternatives, there are imperative reasons of overriding public interest (IROPI) for progressing the allocation; and necessary compensatory measures can be secured). The HRA has explored alternatives separately to the SA (in line with the different regulatory requirements). HRA alternatives have explored options in relation to flood prevention and sea defence, site decontamination, marine employment hub development, the proposed bridge link, and housing development. The HRA recognises the key role of housing as 'enabling development' vital to financial viability, and the lack of feasible/ available alternative locations to support marine employment hub development (recognising Tipner as a long-standing identified prime site for such development given its potential for redevelopment, waterfront location, and deep-water access).
- 5.30 The proposal is also being developed in the context of the Council's corporate obligations such as delivery of its Economic Regeneration Strategy, its Local Transport Plan, and the City Deal. All of these provide a strong case for development at Tipner West & Horsea Island East (including the bridge link across Tipner Lake), as well as the Council's role as Lead Local Flood Authority (LLFA) and the opportunities at the site for improved flood defences.
- 5.31 RSPB and Hampshire & Isle of Wight Wildlife Trust object to the strategic allocation and urge the Council to explore options that do not involve the direct loss of SPA/ Ramsar habitats. Policy PLP3 in the Pre-Submission Local Plan acknowledges that some loss of SPA/Ramsar habitats is inevitable as a result of dredging to establish and maintain deep water access to the marine hub, but the policy otherwise favours the avoidance of any loss of SPA/Ramsar habitats. While the allocation identifies an area totalling 0.5ha for possible reclamation from Portsmouth Harbour and contemplates the possibility of development on up to 3.6ha of terrestrial protected habitat, this will only be permitted where shown to be necessary for project viability and feasibility. It is noted that options for the Tipner peninsula involving no land reclamation were explored in the Interim SA Report in 2021.

Portsmouth City Centre

- 5.32 Options for City Centre growth have been explored to date through the Interim SA Report (presented at Regulation 18 consultation) and remain broadly the same as before supported by ongoing masterplanning work. At this stage, sites (including the large City Centre North site set to deliver 2,300 homes) are cumulatively expected to deliver 4,158 new homes, 20,000sqm (gross) office space (due to redevelopment of existing office stock the net gain will be 1,546sqm), and a new market.

St James Hospital and Langstone Campus

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5.33 There are no significant changes in the continued progression of this site, which is expected to deliver 417 new dwellings alongside new healthcare facilities, new education facilities, and new sports and community facilities.

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Lakeside Business Park

5.34 Following consultation and continued viability testing, additional housing development alongside employment development at Lakeside is no longer being pursued. The site is a focus for employment development and is expected to deliver 50,000sqm of new office floorspace.

Cosham

5.35 As Local Plan work has progressed, no deliverable strategic options for development in Cosham have been identified. Whilst opportunities for estate regeneration will continue to be explored by the Council, significant development in this area is not identified as part of housing supply over the plan period. Small sites identified as developable in the HELAA will be progressed.

Fratton Park and the Pompey Centre

5.36 There are no significant changes in the continued progression of this site, which is expected to deliver the expansion of the football stadium alongside 710 new homes, small commercial and business/ service uses associated with the Club and stadium, a new hotel (approximately 145 rooms), and mixed conference and event facilities.

Site allocations

5.37 Potential additional allocation sites are emerging at this stage. These sites have been considered through the HELAA and SA to date and include:

- Port Solent (delivering 500 new homes)
- St John's College (delivering 212 new homes)
- Fraser Range (delivering 134 new homes)
- The News Centre, Hilsea (delivering 100 new homes and a new electric bus depot with supporting small-scale commercial and community uses)
- Somers Orchard, Somerstown (delivering 565 new homes)
- Land west of Portsdown Technology Park (delivering 12,500 sqm new employment space)

Estate regeneration

5.38 Council owned housing estates continue to be a focus for renewal and regeneration, with a continued focus on opportunity areas at Somerstown and North Southsea, Buckland, Landport, Portsea, and Paulsgrove. However, at this stage, no strategic opportunities have been identified and no supply figures for the plan period have been identified.

- Official -

Non-strategic sites

5.39 The HELAA has been updated following Regulation 18 consultation and continues to identify a supply of non-strategic (small and medium) housing, employment, and mixed-use development sites. The HELAA and Appendix 2 of the Local Plan has identified a contribution of 1,543 new homes over the plan period from small and medium sites of less than one hectare (with capacity for five or more dwellings). The HELAA and Appendix 3 of the Local Plan further identifies a total supply of 457 new homes on sites over one hectare (with capacity for five or more homes). A 15% (300 homes) 'non-implementation discount' (explained in next section) is applied to these totals to provide the necessary flexibility in delivery. On this basis, the HELAA predicts a total supply of 1,700 new homes over the plan period from non-strategic sites. These figures have been carried forward to Table 6.1 of the Local Plan.

- Official -

Are there additional considerations for future growth?

5.40 This sub-section seeks to identify wider parameters that have a bearing on a future growth alongside the needs and location-specific work discussed above.

Under-delivery issues and Duty to Cooperate

5.41 Portsmouth has experienced historic under delivery issues and on this basis the Council have sought to apply an under-delivery discount – the ‘non-implementation discount’ to future development sites (referred to in above discussion on non-strategic sites). This 15% discount seeks to capture a more realistic delivery rate based on past trends. This also captures a more realistic supply and likely shortfall (against needs estimated using the NPPF Standard Methodology).

5.42 PCC continues an active membership of the Partnership for South Hampshire (PfSH) and the Local Plan seeks to take account of wider issues and opportunities affecting the PfSH sub region. The Spatial Position Statement (SPS) published in December 2023⁹ recognises housing shortfalls across the PfSH sub region, including at Portsmouth.

5.43 With the progression of the latest SPS and work of the partnership, it is expected that these shortfalls will diminish over time with emerging additional land allocations exceeding local needs within certain areas and with the ongoing investigation of Broad Areas of Search for Growth as identified in the SPS.

5.44 A contribution of 800 homes from Fareham Borough Council has been agreed and accounted for in the adopted Fareham Local Plan 2037.

Other forms of housing supply

5.45 Portsmouth has benefitted from recent delivery of new Purpose-Built Student Accommodation (PBSA), but with a reduction of schemes in the pipeline, delivery rates are expected to be lower than that experienced in recent years. The equivalent contribution of recent student housing development has been included within the Council’s completions and commitments figure, which currently stands at 1,455 after applying a 15% ‘non-implementation discount’ to outstanding commitments. A further 731 new homes are expected as an equivalent contribution from Houses in Multiple Occupation (HMOs) which house many of the students in Portsmouth.

5.46 Using the government’s proposed ratio of 1.813 C2 accommodation beds being the equivalent to one dwelling, a further 44 new homes are expected as an equivalent contribution from C2 accommodation over the plan period.

5.47 In addition to the sources discussed above, the HELAA estimates for small-scale residential windfall development sites (sites delivering less than five new homes) a total of 1,007 new dwellings over the 20-year plan period.

⁹ [PfSH Spatial Position Statement](#) (2023)

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Options explored in the Interim SA Report (2021)

5.48 The SA to date has sought to explore all options for meeting the estimated housing needs of Portsmouth. Most recently the [Interim SA Report \(2021\)](#), recognising the housing supply constraints, assessed options that would meet needs entirely within the city boundary, and options where some reliance was placed on meeting a proportion of needs outside the city boundary through Duty to Cooperate. These options tested meeting needs by increasing densities at strategic and non-strategic sites, by releasing open spaces, by releasing strategic employment land, or through accelerated estate regeneration schemes. These options also tested a reduced reliance on strategic development sites – including no land reclamation at Tipner, no housing delivery at Lakeside, and reduced development within the City Centre, at Cosham (which is now allocated as a strategic site in the Local Plan), and at the Pompey Centre.

- Official -

What reasonable alternatives can be identified at this stage?

5.49 This sub-section seeks to draw together the work that explored growth needs, growth locations and additional considerations for growth, to arrive at the current reasonable alternatives for plan-making and SA.

Housing supply

5.50 The supply sources discussed above are brought together in Table 5.1 and balanced against the forecasted need. This represents the current potential total housing contribution identified within Portsmouth, which falls short of top-end estimations of needs (using the Standard Methodology) but broadly aligns with mid-level (trend-based population projections) estimates identified within the HEDNA.

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Table 5.1: Housing needs and supply forecasts

Source		No. of homes
Strategic development sites	Portsmouth City Centre	4,158
	Tipner West & Horsea Island	814
	Tipner East	1,056
	St James' Hospital and Langstone Campus	417
	Fratton Park and the Pompey Centre	710
Strategic allocations	Port Solent	500
	St John's College	212
	Fraser Range	134
	The News Centre, Hilsea	100
	Somers Orchard, Somerstown	565
HELAA sites	Small/ medium sites <1ha with capacity for 5 or more homes.	1,543
	Sites >1ha with capacity for 5 or more homes.	457
	'Non-Implementation 'Discount' (15%)	-300
Net completions	Sites of 5 or more dwellings 2020-23	305
Permissions outstanding	As of 31 st March 2023	1,353
	'Non-Implementation 'Discount' (15%)	-203
Windfall estimate	Small sites <5 homes	1,007
Equivalent contributions	HMOs	731
	C2 accommodation completions	44
Total supply		13,603
Housing needs	Standard Methodology	17,980
	HEDNA trend-based population projections	13,100
	HEDNA jobs growth lower-end estimations	8,620
Need/ supply balance	Standard Methodology	-4,377
	HEDNA trend-based population projections	+503
	HEDNA jobs growth lower-end estimations	+4,983
Potential contributions from outside the city (DtC)	Fareham	800
Need/ supply balance including DtC	Standard Methodology	-3,577
	HEDNA trend-based population projections	+1,303
	HEDNA jobs growth lower-end estimations	+5,783

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Key considerations for housing growth

- 5.51 A key consideration, and one of the most contentious aspects of the Local Plan, is the Tipner West and Horsea Island East proposal, and it is recognised that the SA to date has included this key strategic development site in all city-wide housing options explored (recognising its continuing work and context as part of the City Deal). Closely linked to this proposal is the recognition of the extent of proposed development within Flood Risk Zones 2 and 3.
- 5.52 A Level 1 and 2 Strategic Flood Risk Assessment (SFRA) has been developed alongside plan-making. Recommendations are made through the Level 1 report for Portsmouth CC to consider when developing their Local Plan, drafting strategic policies, and establishing requirements for development management. It assesses the risk to an area from all sources of flooding, now and in the future, taking in account the impacts of climate change, as well as assessing the cumulative impact that land use changes and development in the area will have on flood risk.
- 5.53 Local Planning Authorities apply the Sequential Test (in line with national policy) to avoid flood risk and steer development towards those areas at least risk of flooding. The SFRA Level 1 helps to apply this. Following the application of the Sequential Test, it may not always be possible to avoid locating development in areas at risk of flooding, as is the case for Portsmouth. SFRA Level 2 therefore helps to apply the Exception Test (again in line with national policy). The SFRA Level 2 focusses on strategic and allocated sites located within flood zones and provides more detailed information about the nature of flood risk in these areas. The SFRA Level 1 and 2 recommend measures that can support the council in mitigating and managing flood risk when development encroaches into areas at risk of flooding.
- 5.54 Housing options at this stage have thus sought to support the Council in developing sequential testing, and in thoroughly testing wider options for housing growth that exclude additional housing development at Tipner West and Horsea Island (above that already committed at Tipner East).

City-wide spatial options for housing growth

- 5.55 The following housing growth options are identified (informed by the HELAA) for SA:
- **Option H1:** Only develop all deliverable and developable HELAA sites within Flood Risk Zone (FRZ) 1 (This option will significantly fall short of meeting the housing need).
 - **Option H2:** Maximise housing delivery¹⁰ (where possible) on all deliverable and developable HELAA sites within FRZ1 (NB, this option will still fall significantly short of meeting the housing need).
 - **Option H3:** Develop some areas within FRZ2/ 3¹¹ reflective of the current plan strategy (NB, this option is expected to boost the contribution to housing supply and meet the lower end estimates for housing needs, but is

¹⁰ See Para 5.56

¹¹ Excluding coastal Flood Risk Zone 3b as agreed with the Environment Agency and neighbouring authorities.

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still unlikely to meet the housing need in full using the standard methodology)

- **Option H4:** Maximise housing delivery¹² (where possible) on sites, including sites within FRZ2/ 3¹³ (NB, this option is expected to slightly exceed the supply anticipated under Option 3, but is still considered unlikely to meet the housing need in full using the standard methodology)

5.56 Avoiding development in Flood Risk Zones 2 and/ or 3 will mean avoiding development at some allocated and identified sites (sites where >50% of the land intersects Flood Risk Zones 2 and/ or 3). These include:

- Strategic Sites: Tipner West & Horsea Island East and Tipner East (no additional development above that committed).
- Site Allocations: Port Solent and The News Centre, Hilsea
- Small and medium housing sites: NE02 (Smeaton Street Garages), PA03 (140 Southampton Road), EC07 (4 Waverley Road), DF06 (East Lodge Farm), HI04 (land at Pompey Health and Fitness Club), ST17 (Clarence Pier), EC01 (Fraser Range), EC14 (Eastney Swimming Pool), SJ12 (84-88 Clarendon Road), SJ16 (Wimbledon Park Sports Park Centre)

5.57 When maximising delivery at sites, the Council have determined that the following sites are suitable to be tested to deliver higher housing numbers:

- Somers Orchard, Somerstown – this site is in FRZ1. As a Council owned estate, a higher density scheme delivering 700 homes in total is being tested (delivering an additional 134 homes than the currently estimated 566 dwellings). Applicable to Options H2 and H4.
- The News Centre, Hilsea – a housing only scheme (i.e., no delivery of a new bus depot) is being tested as an alternative which could deliver 200 homes in total (100 additional homes to the currently estimated 100 dwellings). This is only applicable to Option H4 as it lies within FRZ2/ 3.
- City Centre – further intensification and regeneration at the City Centre could boost housing supply to potentially around 5,000 new homes (an additional 842 homes to that currently estimated) though this is notably likely to adversely impact strategic employment growth targets. Applicable to Options H2 and H4 as FRZ1.
- Port Solent – further intensification and regeneration at Port Solent could increase the number of homes delivered at this site to around 600-700 homes (100-200 additional homes to that currently estimated). This is only applicable to Option H4 as it lies within FRZ2/ 3.
- St James' & Langstone Campus – a small part of this site lies within FRZ2/ 3. An option for increased development at this part of the site could deliver around 200 homes (an additional 80 homes to that currently identified). Applicable to Options H2 and H4 with development focused within FRZ1.
- Tipner West and Horsea Island East – maximising delivery on this site could see a total of 1,250 new homes. This is at the top end of the range of

¹² See Para 5.56

¹³ Excluding coastal Flood Risk Zone 3b as agreed with the Environment Agency and neighbouring authorities.

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new homes for which the site is allocated. This is only applicable to Option H4, though it is recognised that this could emerge under H3 as well.

Key considerations for employment growth

- 5.58 With the HEDNA identifying employment growth levels somewhat lower than the sub-regional PfSH work has estimated, it is considered appropriate at this stage to investigate the key sites underpinning the employment growth strategy and options for employment growth levels. These are notably constrained by a lack of suitable sites and competing housing needs.
- 5.59 To inform plan-development, options for the level of growth have been identified and the Council has sought to identify how these levels of growth could realistically be met. This is split into options for office employment development and industrial/ warehousing employment development.

City-wide spatial options for employment growth

5.60 For office floorspace, the following options are identified for assessment:

- **Option OF1:** An additional 42,500 sqm of office space focused at Lakeside Business Park. (HEDNA lower end estimate of need)
- **Option OF2:** An additional 61,700 sqm of office space focused at Lakeside Business Park and the City Centre. (HEDNA top end estimate of need)
- **Option OF3:** An additional 74,217 sqm of office space in the city within the city centre and at Lakeside Business Park. (PfSH estimate of need)

5.61 For industrial/ warehousing floorspace, the following options are identified for assessment:

- **Option IF4:** A net loss of industrial/ warehousing space (-42,800sqm). It is assumed this would be achieved through proposed changes of use at (some) existing industrial employment sites. (HEDNA lower-end estimate of need)
- **Option IF5:** An additional 96,300 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (HEDNA top-end estimate of need)
- **Option IF6:** An additional 210,214 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (PfSH estimate of need)

Policy options

5.62 In the context of these discussions around future growth, there are notably a few policy areas that stand out with the potential to affect the overall growth strategy and thus warrant further attention as part of options assessment. These key policy focus areas have been developed in collaboration with PCC and cover Houses of Multiple Occupation, First Homes, and Biodiversity Net Gain.

HMOs

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5.63 Houses of Multiple occupation (HMOs) meet the needs of those that require a more affordable housing option (including around 42% of students) and the Council includes HMOs in its land supply data given the large amount permitted and delivered over recent years and the role they play in helping to meet the city's housing need. Most notably the HMO supply in Portsmouth is falling and affordability is worsening, and the supply of HMOs can reduce the availability of family-sized homes in the city. Given these implications for housing supply, the Council have identified a range of options for HMO policy direction. Policy directions may seek to place a percentage limit on HMOs within any given area, and there are options for the percentage level and radii distance that extends any application site. The options are summarised as follows:

- **Option HMO1:** No additional HMO development (0%) city-wide
- **Option HMO2:** 5% limit within 50m radius of application site
- **Option HMO3:** 5% limit within 100m radius of application site
- **Option HMO4:** 10% limit within 50m radius of application site
- **Option HMO5:** 10% limit within 100m radius of application site
- **Option HMO6:** 15% limit within 50m radius of application site

First Homes

5.64 The First Homes scheme is targeted specifically at first-time buyers and can offer a home at between 30 – 50% cheaper than its market value. These homes are either new builds (built by a developer), or purchases of an existing 'First Home' under the scheme. The scheme seeks to provide for affordable home ownership needs (separate to affordable renting needs) and has eligibility criteria which includes a maximum total annual household income of £80,000 in Portsmouth. Council's may also set further eligibility conditions which can for example, prioritise essential workers, people who live in the area, and those on lower incomes.

5.65 The Council is currently exploring the percentage of affordable housing that should be given over to the First Homes scheme, recognising that the scheme represents one element of affordable housing, targeted at a particular group (first-time buyers). It is important to note that all options form a percentage of the affordable housing element of a development proposal and they do not affect the overall level of affordable housing contributions (just the sub-type).

5.66 Three options have been identified in relation to First Homes:

- **Option FH1:** 0% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.
- **Option FH2:** 10% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.
- **Option FH3:** 25% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.

Biodiversity Net Gain

5.67 Biodiversity net gain (BNG) is an important principle for development which has emerged over recent years as a means of creating and improving natural

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habitats and reversing biodiversity decline trends. BNG makes sure development has a measurably positive impact on biodiversity, compared to what was there before development.

5.68 BNG has become mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) which requires developers to deliver a BNG of 10%. The Local Plan policies can ultimately seek to align with the emerging planning law or look to exceed the requirement (it is not considered reasonable to seek lower percentages given the emerging law).

5.69 On this basis, two options have been identified in relation to BNG:

- **Option BNG1:** require 10% net gain in all developments.
- **Option BNG2:** require 20% net gain in all developments.

5.70 An assumption is made in that both options will prioritise on-site delivery wherever possible.

5.71 A total of six sets of options (relating to housing, employment, and HMOs, First Homes, and BNG policies) are taken forward for assessment in the next chapter.

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6. Appraising reasonable alternatives

6.1 This chapter presents appraisal findings for the housing growth options, employment growth options, and policy options established in Chapter 5. Two sets of employment growth options and options under three different policy themes follow the housing growth options.

Methodology

6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 3.1) as a methodological framework. Green shading is used to indicate significant positive effects, whilst red shading is used to indicate significant negative effects, however this is also stated in text. Where appropriate neutral effects or uncertainty will also be noted. Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

6.3 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference (separate to the summary of likely significant effects). This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the site option or options that are preferred from an SA perspective with '1' being the highest ranking. '=' has been used to highlight where options perform equally and cannot be differentiated between.

Housing growth options

6.4 Chapter 5 establishes the following four housing growth options for the purposes of SA:

- **Option H1:** Only develop all deliverable and developable HELAA sites within Flood Risk Zone (FRZ) 1 (This option will significantly fall short of meeting the housing need).
- **Option H2:** Maximise housing delivery¹⁴ (where possible) on all deliverable and developable HELAA sites within FRZ1 (NB, this option will still fall significantly short of meeting the housing need).
- **Option H3:** Develop some areas within FRZ2/ 3¹⁵ reflective of the current plan strategy (NB, this option is expected to boost the contribution to housing supply and meet the lower end estimates for housing needs, but is still unlikely to meet the housing need in full using the standard methodology)
- **Option H4:** Maximise housing delivery¹⁶ (where possible) on sites, including sites within FRZ2/ 3¹⁷ (NB, this option is expected to slightly

¹⁴ See Para 5.56

¹⁵ Excluding coastal Flood Risk Zone 3b as agreed with the Environment Agency and neighbouring authorities.

¹⁶ See Para 5.56

¹⁷ Excluding coastal Flood Risk Zone 3b as agreed with the Environment Agency and neighbouring authorities.

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exceed the supply anticipated under Option 3, but is still considered unlikely to meet the housing need in full using the standard methodology)

SA objective		Option H1: Develop in low flood risk areas only	Option H2: Maximise housing delivery in low flood risk areas	Option H3: Some development within FRZ2/ 3 (current strategy)	Option H4: Maximise housing delivery including in FRZ2/ 3
1 (Economy)	Significant effect?	No	Uncertain	Yes - positive	Yes - positive
	Rank	3	4	1	2
2 (Town centres)	Significant effect?	No	No	Yes - positive	Yes - positive
	Rank	4	3	2	1
3 (Sustainable transport)	Significant effect?	No	No	Yes - positive	Yes - positive
	Rank	4	3	2	1
4 (Climate change, flooding, and coastal change)	Significant effect?	No	No	Yes - positive	Yes - positive
	Rank	4	3	2	1
5 (Housing)	Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive
	Rank	4	3	2	1
6 (Healthy communities)	Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive
	Rank	2	2	1	1
7 (Historic environment)	Significant effect?	Uncertain	Uncertain	Uncertain	Uncertain
	Rank	1	2	3	4
8 (Urban design)	Significant effect?	No	No	No	No
	Rank	2	3	1	4
9 (Natural environment)	Significant effect?	Yes - negative	Yes - negative	Yes - negative	Yes - negative
	Rank	1	2	3	4
10 (Natural resources)	Significant effect?	No	No	No	No
	Rank	1	2	3	4

Economy

- 6.5 With regards to economic effects, a significant element of the employment growth strategy of the Local Plan rests on the delivery of the marine employment hub at Tipner West and Horsea Island East, and significant economic benefits are associated with the development proposals here. Avoiding housing development within Flood Risk Zones 2 and 3 (Options H1

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and H2) will ultimately remove the housing elements of plans at Tipner West and Horsea Island East and Port Solent (both City Deal sites) which could impact the viability of the overall proposals including the new transport hub, bridge link and improved access to the city centre from the west. Whilst this is unlikely to deliver significant impacts in relation to the baseline, it is recognised that Options H1 and H2 are less likely to fully realise the economic benefits (and significant positive effects) associated with the City Deal sites that are included in Options H3 and H4. Two smaller HELAA employment sites would also be removed from the growth strategy under Options H1 and H2 with the potential for minor negative effects. On this basis, Options H3 and H4 are ranked better than Options H1 and H2.

- 6.6 With regards to maximising delivery at key sites (under Option H2 and H4), it is recognised that supporting housing would be at some of the most accessible locations in the City (that provide good access to employment opportunities) but further housing development in the city centre could reduce the opportunities for supporting employment development, including office uses, retail and commercial uses. On this basis, the preferred strategy (Option H3) is ranked better than Option H4, and Option H1 is ranked better than Option H2. The overall effects for the economy when maximising housing development within the city centre are uncertain at this stage in the absence of precise alternative employment locations to determine the impact upon economic development strategies.

Town centres

- 6.7 Like the discussion under economy, significant benefits from enhanced city centre connections are associated with the new transport hub at Tipner East and bridge link at Tipner West and Horsea Island East, and Options H1 and H2 which exclude housing development at Tipner West and Horsea Island East and Port Solent could undermine the viability of the proposals, making them less likely of fully realising these benefits. For this reason, Options H3 and H4 are ranked better than Options H1 and H2, and Options H1 and H2 are considered less likely to result in significant positive effects (whilst recognising some uncertainty).
- 6.8 Maximising housing delivery at some of the key sites will continue to support town centres and their long-term vitality. Maximised housing delivery in the city centre would likely benefit retail uses but wider uses are needed to maintain a sustainable mix that promotes vitality. Assuming this will still be achieved, enhanced benefits for town centres are expected under options that maximise housing delivery (Options H2 and H4) which make these options rank marginally better than their counterparts (Options H1 and H3 respectively).

Sustainable transport

- 6.9 All options are pursuing a growth strategy that will impact the road network by introducing new vehicles and adding to congestion. Unlocking opportunities to improve sustainable transport options will therefore be key to reducing the extent of the likely impacts of any growth strategy, including impacts for air quality. In this respect, Options H3 and H4 are ranked better than Options H1 and H2 as they provide greater opportunity to secure infrastructure improvements - the new bridge link at Tipner West and Horsea Island East.

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This would improve access for both new and existing residents west of the city centre.

- 6.10 Whilst it is expected that options which avoid development in FRZ2/ 3 (Options H1 and H2) will support measures to improve sustainable transport access and active travel opportunities the benefits are not expected to be as significant as the new infrastructure proposals associated with Tipner West and Horsea Island East (and ultimately the housing element of this proposal is key to ensuring viability and leveraging in private sector investment). Minor positive effects are therefore considered more likely under these options.
- 6.11 Development will also need to consider access and egress from strategic sites located near to flood risk areas and ensure sustainable transport connections are free from flood risk and maintained in times of emergency.
- 6.12 With regards to increasing housing delivery at certain sites, these sites, particularly at the city centre, are accessible locations that can support sustainable transport choices including active travel options. Additional housing in these areas is likely to improve the viability of supporting infrastructure improvements and get more people using sustainable transport options to improve the viability of these options. Increasing housing delivery at appropriate locations is therefore viewed positively, and these options (Options H2 and H4) are ranked better than their counterparts (Options H1 and H3 respectively) – whilst Options H3 and H4 ranked best overall.

Climate change, flood risk, and coastal change

- 6.13 With regards to flood risk, it is recognised that a key element of the new proposal at Tipner West and Horsea Island East is the delivery of improved flood defences, coupled with decontamination of the site to reduce the potential for leachate pollution into the protected Harbour. With regards to mitigation, this scheme will also deliver a bridge link (linked with a new transport hub at Tipner East) that will improve access to/ from the west. This is recognised as an expensive scheme with extensive mitigation requirements to make the site acceptable for development (and deliver benefits in relation to climate change and flood risk). The scheme ultimately hinges on leveraging further private and public sector investment, and enabling housing development is therefore a vital aspect. The delivery of the Tipner West and Horsea Island East allocation (Options H3 and H4) is considered to have good potential to secure significant positive effects in relation to climate adaptation, mitigation, and flood risk.
- 6.14 Options that avoid development in FRZ2/ 3 are expected to avoid significant impacts arising in relation to flood risk, and neutral effects in relation to the baseline would be expected. Ultimately these proposals (Options H1 and H2) are less likely to positively (and significantly) affect the baseline and are thus ranked lower than Options H3 and H4, including in relation to climate mitigation in the absence of the new bridge link. Despite this, they are still considered to perform well in relation to climate change, particularly by avoiding locating vulnerable development within flood risk zones rather than mitigating these effects.
- 6.15 Increasing housing delivery on key sites could improve the viability for supporting infrastructure improvements assuming that this is not to an extent that it compromises elements such as new open spaces. The key sites subject

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to increases are also accessible locations that can support sustainable transport connections and active travel opportunities. Options to increase housing delivery at key sites (Options H2 and H4) are therefore considered to rank lower than their counterparts (Options H1 and H3 respectively) with Option H4 ranked last given the greater level of development under this option.

- 6.16 With regards to sequential testing, it is recognised that under any option housing needs are still unlikely to be met, thus no deliverable and developable sites within flood zones could be ruled out sequentially as they are all required to deliver homes. Exception testing for sites located within flood risk area should identify mitigation measures that substantially reduce the risk of flooding posed to vulnerable uses.
- 6.17 It is assumed that any development proposal would follow policy requirements in relation to high-quality and sustainable design that improves the resilience of the built environment and local communities.

Housing

- 6.18 All options perform positively against this SA objective by identifying a housing strategy that seeks to meet local housing needs. Given the geographical constraints to growth in Portsmouth, none of the options are considered likely to meet housing needs in full as estimated using the Government's standard methodology. An increasing housing supply is expected under each of the Options with Option H4 delivering the most homes. Options which deliver more homes within the city boundary over the plan period are considered to rank better, with Option H4 ranked first. Furthermore, recognising increasing affordability issues and significant density increases in Portsmouth, it will be important that any option progressed is supported by a wider policy framework that seeks to deliver the right types of homes and housing tenures and promotes high-quality living environments.

Healthy communities

- 6.19 All options seek to identify a housing delivery strategy that can support healthy communities and deliver against their housing needs. However, under-supply is anticipated under any scenario which has implications for healthy communities, recognising that this affects both housing availability and affordability. These effects are likely to be most pronounced under Option H1 followed by Option H2, but it is uncertain whether such effects would be significant given there is a housing supply forecasted over the short to medium term under these options.
- 6.20 All options are progressing development in relatively accessible locations that provide access to services, facilities, employment opportunities, open space, sustainable transport options, and active travel opportunities. Significant positive effects are therefore anticipated. The increasing housing supply under the options (with Option H4 delivering the most homes) is expected to enhance the potential range of accessible homes and provide more local affordable housing options overall, though maximising housing delivery on sites could affect the delivery of wider on-site community benefits which should ultimately be avoided. An increasing housing supply can also enhance positive contributions to reducing deprivation. However, Options H3 and H4 will place vulnerable uses (housing) within flood risk areas potentially placing these new

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communities at risk. Mitigation will be required to reduce this risk. However, the development proposed in FRZ2/ 3 at Tipner West and Horsea Island East is expected to deliver flood betterment schemes that extend the site and will improve community resilience (for existing communities) in the longer-term. The new flood defences at Tipner West will also provide protection for the existing community of Stamshaw in the north west of Portsea Island.

- 6.21 Avoiding the delivery of enabling housing development at Tipner West and Horsea Island East (Options H1 and H2) and further development at Port Solent, would undermine the viability of the Tipner West and Horsea Island East allocation, which seeks to deliver multiple community benefits (new flood defences, a new bridge link, significant new open space, and a marine employment hub). On this basis, Options H3 and H4 which include a housing element to the Tipner West and Horsea Island East scheme, and the Port Solent key site, are considered to rank better than options that exclude these (Option H1 and H2). But this is on the assumption that vulnerable uses in flood risk areas will be supported with sufficient mitigation measures to reduce or alleviate flood risk.

Historic environment

- 6.22 An increasing housing supply under the options (with Option H4 delivering the most homes) is considered to have the potential to increase risks for the historic environment – by means of more development, in more locations, potentially affecting more aspects of the baseline.
- 6.23 There are designated heritage assets that have the potential to be impacted by development at some of the key sites which are added to Options H3 and H4. This may generate increased need for mitigation to reduce effects on the significance of assets and makes these options (Options H3 and H4) rank lower than Options H1 and H2 (which have fewer development locations). Option H4 is ranked lowest as the increased housing delivery at key sites increases the potential pressures on designated assets, particularly within the City Centre. Overall, the lowest growth option (Option H1) is ranked best. The potential for some negative effects under all options are possible at this stage, however it is the role of the development management process and site-specific assessment to identify, avoid and mitigate any negative impacts that may arise on heritage assets. In consequence, uncertainty is concluded. Residual effects will need to be informed by detailed site proposals and mitigation strategies as appropriate.

Urban design

- 6.24 With regards to urban design, it is expected that any option could deliver high-quality design proposals that accord with design principles likely to be set by the Local Plan. This makes it hard to meaningfully differentiate between the options.
- 6.25 Most notably, the relative viability position of the Tipner West and Horsea Island East allocation is improved (to a point where delivery is more feasible) by allowing for enabling housing development, and this has implications for good design, promoting a new and improved high-quality environment in the west of the city that can support growth needs. The site would include land remediation and includes an extensive area of open space at Horsea Island, with dedicated ongoing management programmes in place this will likely

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positively impact upon the baseline. On this basis, Options H3 and H4 are ranked better than Option H1 and H2, but no significant effects are predicted. Additionally, the increased housing delivery on certain sites has implications for high-quality design by its higher density development proposals, accordingly these options (Options H2 and H4) are ranked less preferably to options that do not increase housing delivery at certain sites (Options H1 and H3).

Natural environment

- 6.26 Similar to the historic environment, an increasing housing supply under the options (with Option H4 delivering the most homes) is considered to have increasing risks for the natural environment – by means of more development, in more development locations, affecting more aspects of the baseline.
- 6.27 A premise for biodiversity net gain will assist in avoiding significant effects arising at most development locations, but the HRA concludes that the Tipner West and Horsea Island East allocation will have adverse effects on national and internationally designated biodiversity sites (with or without the housing element of the proposal) – relating to direct habitat loss. On this basis, significant negative effects are concluded as likely under all options.
- 6.28 Despite this, positive effects are also expected from the land remediation, green infrastructure enhancements, and flood mitigation measures proposed at Tipner West and Horsea Island East. The direct support for improved soil and water quality is likely to benefit habitats. Without the new flood defences and decontamination work, the land at Tipner West is likely to be inundated by the sea and contaminant leachate would enter into the protected Harbour, with a significant adverse impact on the natural environment.
- 6.29 There are key habitats and ecological connections that will need to be protected and enhanced across the development locations though most notably, a significant proportion of housing development is directed towards brownfield opportunities. Despite this, there is expected to be increasing mitigation requirements under the increasing housing supply options and this is reflected in the ranking of the options. Overall, the lowest growth option is ranked best.

Natural resources

- 6.30 An increasing housing supply under the options is expected to place increasing levels of pressures on natural resources (including waste generation) and this is reflected in the ranking of options (With Option H4 ranked last). Notably, a significant proportion of the housing supply strategy is underpinned by brownfield development, which will positively support the efficient use of land but as the level of growth increases, so do the expected pressures on water resources and quality. Whilst no significant impacts are predicted site-level mitigation is likely to be required.
- 6.31 The Tipner West and Horsea Island East proposal has the potential to positively affect the baseline through its flood defence and land remediation proposals that will in turn support water quality. These effects are unlikely under options H1 and H2, as they are likely to be viable only with the enabling development of housing to be provided under Options H3 and H4. Overall, no significant effects are considered likely at this stage.

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Employment growth options

6.32 Chapter 5 establishes two separate sets of employment growth options relating to office floorspace development and industrial/ warehousing floorspace development.

Office development

6.33 The following three options relating to office floorspace development are identified for the purposes of SA:

- **Option OF1:** An additional 42,500 sqm of office space focused at Lakeside Business Park. (HEDNA lower end estimate of need)
- **Option OF2:** An additional 61,700 sqm of office space focused at Lakeside Business Park and the City Centre. (HEDNA top end estimate of need)
- **Option OF3:** An additional 74,217 sqm of office space in the city within the city centre and at Lakeside Business Park. (PFSH estimate of need)

SA objective		Option OF1: 42,500sqm at Lakeside Business Park	Option OF2: 61,700sqm at Lakeside Business Park and the City Centre	Option OF3: 74,217sqm at Lakeside Business Park and the City Centre
1 (economy)	Significant effect?	Yes – positive	Yes – positive	Yes – positive
	Rank	3	2	1
2 (town centres)	Significant effect?	Yes – positive	Yes – positive	Yes – positive
	Rank	3	1	1
3 (sustainable transport)	Significant effect?	No	No	No
	Rank	2	1	1
4 (climate change, flooding, and coastal change)	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	1	2	3
5 (housing)	Significant effect?	Yes – positive	Yes – positive	Yes – positive
	Rank	=	=	=
6 (healthy communities)	Significant effect?	Yes – positive	Yes – positive	Yes – positive
	Rank	=	=	=
7 (historic environment)	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	1	2	3
8 (urban design)	Significant effect?	No	No	No
	Rank			

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SA objective		Option OF1: 42,500sqm at Lakeside Business Park	Option OF2: 61,700sqm at Lakeside Business Park and the City Centre	Option OF3: 74,217sqm at Lakeside Business Park and the City Centre
	Rank	=	=	=
9 (natural environment)	Significant effect?	Uncertain	Uncertain	Uncertain
	Rank	1	2	3
10 (natural resources)	Significant effect?	No	No	No
	Rank	=	=	=

- 6.34 Long-term significant positive effects are considered likely under all three options for the **economy**, **town centres** and **housing** SA objectives. With regards to the economy, it could be considered that as the amount of additional office space increases, as do the benefits for the local economy due to increased employment opportunities (as reflected in the ranking of options). However, the HEDNA highlights that the quality of employment space is more important than quantity, especially given reduced office attendance since the Covid-19 pandemic. Lakeside Business Park performs well in this respect as it is Portsmouth's premier business location, and the allocation will enable it to continue attracting businesses. Therefore, whilst Option OF1 only meets the lower end estimate of need according to the HEDNA, it is considered to perform well as it only focuses growth at Lakeside Business Park. Options OF2 and OF3 deliver additional office space at the City Centre as well as Lakeside Business Park. This means that new employment opportunities will be spread more widely across the city. With regards to town centres and housing, an increase in office space, and therefore an increase in employment opportunities, is likely to support development opportunities for housing and increase footfall in town centres, supporting their vitality and future growth. For this reason, Options OF2 and OF3 perform marginally better in relation to town centres.
- 6.35 Significant positive effects are also considered likely in relation to healthy communities, recognising that unemployment can be a determinant of poor health and the options all provide jobs in accessible locations connected by sustainable transport options.
- 6.36 Minor positive effects are considered likely under all three options for the **sustainable transport**, and **urban design** SA objectives. With regards to sustainable transport, this is because all three options propose additional office space in sustainable locations that are either accessible via active travel (i.e., walking or cycling) or public transport. Options OF2 and OF3 deliver additional office space at both Lakeside Business Park and the City Centre. This means that new employment opportunities will be spread more widely across the city, and therefore more residents are likely to walk or cycle to work, making Options OF2 and OF3 rank marginally better than Option OF1 given the more accessible City Centre development. With regards to urban design, new office space should be well-designed in line with emerging Local Plan policies.

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- 6.37 However, it is recognised that the higher the quantum of the development, the more trips are likely to be generated, including trips by less sustainable modes of transport. This is reflected in the ranking under the sustainable transport objective with Option 1 ranked best overall for the lower quantum of development. Given the development locations are relatively well connected by sustainable transport modes, no significant negative effects are predicted at this stage.
- 6.38 Uncertainty is noted under all three options for the **climate change, flooding, and coastal change, historic environment, and natural environment SA** objectives. With regards to climate change, flooding, and coastal change, this is because whilst both Lakeside Business Park (all options) and the City Centre (Options OF2 and OF3) are currently within Flood Zone 1, in 100 years it is predicted that they could be partially within Flood Zone 2/ 3 (or predominantly within Flood Zone 2/ 3 at Lakeside) so there may be a need for further mitigation. With regards to the historic and natural environment, impacts on heritage assets and the local landscape are largely dependent on the layout and design of development. Due to this, it is difficult to predict effects with certainty. For all three SA objectives, it is considered that as the amount of additional office space increases, as does the potential for significant negative effects. It is also noted that the City Centre (Options OF2 and OF3) is more constrained by heritage assets than Lakeside Business Park (all options). The options are therefore ranked according to the quantum of additional office space they deliver.
- 6.39 No significant effects are predicted under all three options for the **natural resources SA** objective. This is because the delivery of additional office space at both Lakeside Business Park (all options) and the City Centre (Options OF2 and OF3) will largely involve the intensification of brownfield land.

Industrial/ warehousing development

- 6.40 The following two options relating to industrial/ warehousing floorspace development are identified for the purposes of SA:
- **Option IF4:** A net loss of industrial/ warehousing space (-42,800sqm). It is assumed this would be achieved through proposed changes of use at (some) existing industrial employment sites. (HEDNA lower-end estimate of need)
 - **Option IF5:** An additional 96,300 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (HEDNA top-end estimate of need)
 - **Option IF6:** An additional 210,214 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (PfSH estimate of need)

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SA objective		Option IF4: net loss (-42,800sqm)	Option IF5: additional 96,300sqm	Option IF6: additional 210,214sqm
1 (economy)	Significant effect?	Yes – negative	Yes – positive	Yes – positive
	Rank	3	1	2
2 (town centres)	Significant effect?	Yes – negative	Yes – positive	Yes – positive
	Rank	3	1	2
3 (sustainable transport)	Significant effect?	No	No	No
	Rank	1	2	3
4 (climate change, flooding, and coastal change)	Significant effect?	Uncertain	No	Uncertain
	Rank	2	1	3
5 (housing)	Significant effect?	Yes – positive	Yes – positive	Yes – positive
	Rank	3	1	2
6 (healthy communities)	Significant effect?	Yes – positive	Yes – positive	Yes – positive
	Rank	2	1	3
7 (historic environment)	Significant effect?	Uncertain	No	Uncertain
	Rank	2	1	3
8 (urban design)	Significant effect?	No	No	No
	Rank	2	1	3
9 (natural environment)	Significant effect?	Uncertain	No	Uncertain
	Rank	2	1	3
10 (natural resources)	Significant effect?	No	No	No
	Rank	=	=	=

6.41 Long-term significant positive effects are considered likely under Options IF5 and IF6 for the **economy**, **town centres** and **housing** SA objectives. With regards to the economy, it could be considered that as the amount of additional industrial space increases, as do the benefits for the local economy due to increased employment opportunities. Whilst Option IF6 delivers the highest level of additional industrial space, Option IF5 is considered to perform most favourably as it delivers a more viable level of growth. With regards to town centres and housing, an increase in industrial space, and therefore an increase in employment opportunities, is likely to support development opportunities for housing and increase footfall in town centres, supporting their vitality.

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- 6.42 Significant positive effects for **housing** under IF4 are also expected this option provides the opportunity to repurpose accessible employment land for housing purposes (recognising a lack of housing land supply in the city).
- 6.43 Significant positive effects are also considered likely in relation to **healthy communities**, recognising that unemployment can be a determinant of poor health and the options all provide jobs (or potentially alternatively housing) in accessible locations connected by sustainable transport options.
- 6.44 Conversely, long-term significant negative effects are considered likely under Option IF4 for the **economy and town centres** SA objectives. This is because this option will lead to a net loss of industrial/ warehousing space, which will likely weaken the economy, and decrease footfall in town centres, potentially contributing to their decline.
- 6.45 Minor positive effects are considered likely under Option IF5 for the **sustainable transport**, and **urban design** SA objectives. With regards to sustainable transport, this is because this option proposes additional industrial space in sustainable locations that are either accessible via active travel (i.e., walking or cycling) or public transport. In addition, this option delivers additional industrial space across the city, rather than concentrating it in one location, and therefore more residents are likely to walk or cycle to work. With regards to urban design, new industrial space should be well-designed in line with emerging Local Plan policies.
- 6.46 However, it is recognised that the higher the quantum of the development, the more trips are likely to be generated, including trips by less sustainable modes of transport. This is reflected in the ranking under the sustainable transport objective with Option 1 ranked best overall for the lower quantum of new industrial/ warehousing development. Given the development locations are relatively well connected by sustainable transport modes, no significant negative effects are predicted at this stage.
- 6.47 Minor negative effects are considered likely under Option IF6 for the **sustainable transport**, **healthy communities**, and **urban design** SA objectives. This is because the level of additional industrial space proposed under this option is considered unviable and, even if it were to be delivered, would likely lead to a strain on competing uses, transport services and health facilities in the short-term. With regards to urban design, whilst new industrial space is likely to be well-designed in line with emerging Local Plan policies, the level of growth proposed through this option could lead to industrial space dominating parts of the city. Notably, intensification could reduce space for supporting features such as open space and landscaping. This may adversely impact the local environment for residents, especially as industrial space is traditionally utilitarian.
- 6.48 No significant effects are considered likely under Options IF4 for the **sustainable transport**, and **urban design** SA objectives as this option will lead to a net loss of industrial space. However, it is recognised that this option has the potential to support alternative uses at some existing industrial sites, which could be beneficial for these SA objectives. Nevertheless, this is uncertain at this stage.

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- 6.49 Minor positive effects are considered likely under Options IF4 for the **climate change, flooding, and coastal change, historic environment, and natural environment** SA objectives. This is because this option will lead to a net loss of industrial space, which has the potential to reduce flood risk if the space is repurposed into green space, or built-up space that utilises flood risk management measures such as SuDS. A net loss of industrial space under this option could improve the setting and significance of heritage assets and the local landscape. However, as already noted, this is largely dependent on how the industrial space is repurposed, which is uncertain at this stage.
- 6.50 Uncertainty is noted under Options IF5 and IF6 for the **climate change, flooding, and coastal change, historic environment, and natural environment** SA objectives. With regards to climate change, flooding, and coastal change, this is because flood defence mitigation is required to be delivered at Tipner West and Horsea Island East allocation to avoid significant effects arising. With regards to the historic and natural environment, impacts on heritage assets and the local landscape are largely dependent on the layout and design of development. Due to this, it is difficult to predict effects with certainty. For all three SA objectives, it is considered that as the amount of additional industrial space increases, as does the potential for significant negative effects. The options are therefore ranked according to the quantum of additional industrial space they deliver.
- 6.51 No significant effects are predicted under all three options for the **natural resources** SA objective which broadly perform on par with each other. This is because Option IF4 will lead to a net loss of industrial space, whilst the delivery of additional industrial space under Options IF5 and IF6 will largely involve the intensification of brownfield land.

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Policy Options (HMOs)

6.52 Chapter 5 establishes the following options for the purposes of SA:

- **Option HMO1:** No additional HMO development (0%) city-wide
- **Option HMO2:** 5% limit within 50m radius of application site
- **Option HMO3:** 5% limit within 100m radius of application site
- **Option HMO4:** 10% limit within 50m radius of application site
- **Option HMO5:** 10% limit within 100m radius of application site
- **Option HMO6:** 15% limit within 50m radius of application site

SA objective		Option HMO1	Option HMO2	Option HMO3	Option HMO4	Option HMO5	Option HMO6
1 (economy)	Significant effect?	No	No	No	No	No	No
	Rank	3	3	3	3	2	1
2 (town centres)	Significant effect?	No	No	No	No	No	No
	Rank	3	3	3	3	2	1
3 (sustainable transport)	Significant effect?	No	No	No	No	No	No
	Rank	=	=	=	=	=	=
4 (climate change, flooding, and coastal change)	Significant effect?	No	No	No	No	No	No
	Rank	=	=	=	=	=	=
5 (housing)	Significant effect?	No	No	No	No	No	No
	Rank	3	2	2	1	1	2
6 (healthy communities)	Significant effect?	No	No	No	No	No	No
	Rank	3	1	1	2	2	3
7 (historic environment)	Significant effect?	No	No	No	No	No	No
	Rank	=	=	=	=	=	=
8 (urban design)	Significant effect?	No	No	No	No	No	No
	Rank	=	=	=	=	=	=
9 (natural environment)	Significant effect?	No	No	No	No	No	No
	Rank	=	=	=	=	=	=
10 (natural resources)	Significant effect?	No	No	No	No	No	No
	Rank	=	=	=	=	=	=

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SA objective	Option HMO1	Option HMO2	Option HMO3	Option HMO4	Option HMO5	Option HMO6
Rank	=	=	=	=	=	=

- 6.53 Effects in relation to **sustainable transport, climate change and flood risk, historic environment, urban design, natural environment, and natural resources** are expected to be neutral for all options given that under any option, the development location should remain the same (as the options relate to housing tenure/ type). The options cannot be readily differentiated between under these SA objectives and are thus considered to rank on par with each other.
- 6.54 All options seek to place a limit to the concentration of HMOs in any given area. HMOs form an important element of housing supply, generally providing affordable housing options for those on lower incomes, those who do not wish to live independently, and those who need short-term tenancies in an area (e.g., contractors). Typically, this tenure attracts students and young professionals in Portsmouth. 42% of students in Portsmouth reside in HMOs and are still experiencing affordability issues.
- 6.55 The existing Supplementary Planning Document (SPD) that the Council has produced specifically in relation to HMOs¹⁸ seeks to ensure a balance of uses so that HMOs are not heavily concentrated in any given area. It identifies that *“a community will be considered to be ‘imbalanced’ where more than 10% of residential properties within a 50m radius of the area surrounding the application property are already in HMO use.”* The HEDNA identifies that whilst it is difficult to know the full extent of HMO use in the city (given smaller HMOs do not require licenses), it already contains a high concentration of HMOs, and it is therefore assumed that concentration levels above 10% in a 50m radius will lead to increased levels of HMOs in the city, and potentially ‘imbalanced’ communities. The main implications for the options therefore relate to the **healthy communities** and **housing** SA topics and could lead to minor negative effects, as discussed below. Significant negative effects are considered less likely given that all options are seeking to place an overall cap on concentration levels to some degree. These effects are most likely to be concentrated within the wards that already experience high levels of HMOs (Central Southsea, St Thomas, and St Jude).
- 6.56 Conversely, the data shows that there is a need for this type of affordable housing (within the student population and young professionals), so a 0% (no additional HMO development – Option HMO1), or more stringent cap (Options HMO2 and HMO3 - 5% limit within 50m/100m radius of application site) could lead to minor negative effects by restricting opportunities to meet the additional HMO needs arising over the plan period. Furthermore, it is likely that these negative effects would be experienced more widely across the city, with the benefits of further restrictions likely to arise at the wards that already have high levels of HMOs (as above – Central Southsea, St Thomas, and St Jude). Options HMO1, HMO2, and HMO3 could essentially create a cap on new HMO development in areas where they are already most concentrated. Due to the need for HMOs as a type of housing that meets affordable housing need, HMO

¹⁸ [HMOs – Ensuring mixed and balanced communities SPD \(2019\)](#)

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development would be likely to disperse to nearby areas, where concentrations are currently lower.

- 6.57 Most options therefore have the potential to lead to minor negative effects in relation to the housing and healthy communities topics, but Options HMO4 and HMO5 align with the existing evidence that supports a level of HMO development as a form of affordable housing that meets diverse housing needs, and are more likely to continue baseline trends with neutral effects. HMO4 and HMO5 therefore rank highest with regard to the housing topic, with HMO2 and HMO3 ranked in second place and HMO1 and HMO6 considered the lowest ranking options, due to their potential to adversely affect a balanced housing supply in the city.
- 6.58 However, Options HMO2 and HMO3 are ranked first when it comes to healthy communities, by avoiding potential negative social and amenity impacts of higher concentrations of HMOs and ‘imbalanced’ communities. Options HMO4 and HMO5 are considered to rank marginally better than Option HMO1 and HMO6 as the predicted minor impacts are likely to be more focused/ less widely dispersed across the city or beyond.
- 6.59 Minor indirect benefits could be associated with options that promote increased levels of HMOs in the city (Options HMO5 and HMO6) in relation to the **economy** and **retail** themes, given this type of housing provides more adults within a single household spending in local town centres or potentially being employed locally. Whilst no significant effects are anticipated, this makes Options HMO5 and HMO6 rank marginally better than the remaining options (in relation to these SA topics), with Option HMO6 ranked first overall (given the higher levels of HMOs permitted under this option).
- 6.60 Minor indirect benefits could be associated with options that promote increased levels of HMOs in the city (Options HMO5 and HMO6) in relation to the **economy** and **retail** themes, given this type of housing provides more adults within a single household spending in local town centres or potentially being employed locally. Whilst no significant effects are anticipated, this makes Options HMO5 and HMO6 rank marginally better than the remaining options (in relation to these SA topics), with Option HMO6 ranked first overall (given the higher levels of HMOs permitted under this option).

Policy Options (First Homes)

6.61 Chapter 5 establishes the following three options for the purposes of SA:

- **Option FH1:** 0% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.
- **Option FH2:** 10% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.
- **Option FH3:** 25% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.

SA objective	Option FH1: 0%	Option FH2: 10%	Option FH3: 25%
1 (economy)	Significant effect?	No	No

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SA objective		Option FH1: 0%	Option FH2: 10%	Option FH3: 25%
	Rank	1	2	3
2 (town centres)	Significant effect?	No	No	No
	Rank	=	=	=
3 (sustainable transport)	Significant effect?	No	No	No
	Rank	=	=	=
4 (climate change, flooding, and coastal change)	Significant effect?	No	No	No
	Rank	=	=	=
5 (housing)	Significant effect?	No	No	No
	Rank	1	2	3
6 (healthy communities)	Significant effect?	No	No	No
	Rank	1	2	3
7 (historic environment)	Significant effect?	No	No	No
	Rank	=	=	=
8 (urban design)	Significant effect?	No	No	No
	Rank	=	=	=
9 (natural environment)	Significant effect?	No	No	No
	Rank	=	=	=
10 (natural resources)	Significant effect?	No	No	No
	Rank	=	=	=

6.62 Effects in relation to **town centres, sustainable transport, climate change and flood risk, historic environment, urban design, natural environment, and natural resources** are expected to be neutral for all options given that under any option, the development location remains the same (as the options relate to an element of affordable housing delivery onsite). The options cannot be readily differentiated between under these SA objectives and are thus considered to rank on par with each other.

6.63 The options are considered most likely to affect social objectives, predominantly the **housing** objective. In relation to housing, the HEDNA identifies that policy compliant applications would currently be expected to deliver a minimum of 25% affordable housing as First Homes, but the evidence indicates that in Portsmouth, the gap in incomes needed to buy and rent a home in the city is quite small and would suggest a very limited 'need' for First Homes. It is also possible that provision of First Homes could squeeze out other forms of low-cost home ownership (such as shared ownership) schemes.

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The HEDNA evidence suggests a much lower target than 25% as being appropriate – potentially as low as 0% only allowing First Homes where they are needed to support viability. This reflects the evidence which suggests that rented affordable housing is likely to be needed by those with more acute needs and fewer choices in the housing market. Considering the options, minor positive effects are considered most likely under any option given the support for affordable housing delivery, but the options are ranked to reflect the findings of the HEDNA, with lower percentage First Home contributions being ranked more highly than higher percentages.

6.64 By extension, findings in relation to **healthy communities** are expected to be similar to those in relation to housing (with effects being minor positive in nature and options ranked according to the findings of the HEDNA), given that access to high-quality affordable homes (of the right type and tenure) form a key part of balanced communities and affordable housing can target the needs of those generally more deprived and/ or with protected characteristics.

6.65 Minor indirect effects can be drawn in relation to the **economic** SA objective and ensuring the right mix of housing types and tenures can ultimately support a growing housing economy, thus the options are also ranked according to the HEDNA findings.

Policy Options (Biodiversity net gain)

6.66 Chapter 5 establishes the following two options for the purposes of SA:

- **Option BNG1:** require 10% net gain in all developments.
- **Option BNG2:** require 20% net gain in all developments.

SA objective		Option BNG1: 10%	Option BNG2: 20%
1 (economy)	Significant effect?	No	No
	Rank	2	1
2 (town centres)	Significant effect?	No	No
	Rank	2	1
3 (sustainable transport)	Significant effect?	No	No
	Rank	=	=
4 (climate change, flooding, and coastal change)	Significant effect?	Yes - positive	Yes - positive
	Rank	2	1
5 (housing)	Significant effect?	No	No
	Rank	2	1
6 (healthy communities)	Significant effect?	No	No
	Rank	2	1

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SA objective		Option BNG1: 10%	Option BNG2: 20%
7 (historic environment)	Significant effect?	No	No
	Rank	2	1
8 (urban design)	Significant effect?	No	No
	Rank	2	1
9 (natural environment)	Significant effect?	Yes - positive	Yes - positive
	Rank	2	1
10 (natural resources)	Significant effect?	No	No
	Rank	2	1

6.67 Effects in relation to the **economy and town centres** are predominantly indirect and relate to built environment settings. Biodiverse spaces support the quality of neighbourhoods, and spaces where people congregate. High-quality spaces, where people enjoy working and visiting attract continued inward investment and productive economies. Both options under consideration are likely to support such indirect minor benefits for the economy and town centres, and Option BNG2 is ranked marginally better than Option BNG1 given the enhanced level of (green) infrastructure development.

6.68 With regards to **sustainable transport** neither option is considered likely to lead to significant effects and there is little to differentiate between the options. Biodiversity enhancements can benefit active travel uptake and connections, but these effects are considered limited to onsite measures under these options and negligible in this respect.

6.69 There are numerous **climate considerations** but in the context of BNG, effects are likely to be highly positive in nature. As highlighted by the NPPF (2023), well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk and coastal change, notably 20% BNG could lead to improved surface run off rates and reduced surface water flooding). Ultimately, nature-based solutions should be promoted at development sites wherever possible. Whilst both options are considered likely to support significant positive effects, Option BNG2 is ranked higher given the increased (green) infrastructure requirement.

6.70 Effects in relation to **housing** are expected to be positive (albeit minor) given the potential for biodiversity net gain to lead to improved residential environments and supporting public spaces, that are attractive to residents and encourage inward investment. Whilst placing greater infrastructure requirements on developers can affect viability, given the range of net gain solutions available, it is not considered likely that the higher 20% requirement under Option BNG2 would lead to significant impacts on housing delivery. This is supported by evidence¹⁹ that suggest that 20% net gain will not materially affect viability in most cases, and the costs associated with this increase above 10% are often negligible. The evidence demonstrates that biodiversity net gain

¹⁹ CIEEM, 2022 [KNP Assesses 20% Biodiversity Net Gain Requirement](#)

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costs are low compared to other policy costs and suggests that in no cases are they likely to be what renders a development unviable. On this basis, Option BNG2 is ranked marginally better than Option BNG1.

- 6.71 Under both options benefits are expected in relation to **healthy communities** recognising that access to nature and healthy ecosystems support healthy lifestyles, and onsite delivery of biodiversity net gain should ensure equitable access in new developments. Ultimately a net gain approach seeks to mitigate any habitat and species loss in development and support a halt in biodiversity decline that will in turn support climate resilience (and the health of communities). Option BNG2 (with higher net gain requirements) provides greater opportunity to facilitate the wider social and wellbeing benefits that healthy ecosystems offer. In the context of Portsmouth, with increasing densities and significant flood risk constraints, natural solutions promoting multiple benefits should be considered at every opportunity, including in drainage and flood risk solutions, urban design, and water and energy harvesting schemes. On the assumption that neither option will significantly affect the viability of development (as evidence suggests), Option BNG2 is ranked more favourably than Option BNG1 in relation to healthy communities, despite minor positive effects being concluded as most likely under both options.
- 6.72 With regards to the **historic environment** minor indirect benefits are associated with biodiversity and green infrastructure enhancements, that improve built environment settings, and by extension benefit the settings of designated and non-designated heritage assets. A higher net gain (Option BNG2) is ultimately ranked more favourably in this respect, but the differences between the options are negligible in terms of effects. This is under the assumption that both options will seek to avoid impacts in relation to archaeology when delivering habitat restoration or new habitat creation schemes. It is also recommended that such schemes are informed by historic landscape character assessments and Conservation Area Appraisals as appropriate.
- 6.73 Effects in relation to **urban design** are also deemed likely to be positive in nature for both options. The National Design Guide²⁰ recognises that nature contributes to the quality of a place and is a critical and integrated component of well-designed places. Well-designed places achieve BNG through well-integrated drainage, ecology, shading, recreation, and food production. The greater this contribution as part of development, the more positive these effects are likely to be. On this basis, both options are likely to lead to minor positive effects and Option BNG2 is ranked better than Option BNG1.
- 6.74 Effects in relation to the **natural environment** are of greatest significance for the options under consideration. It is recognised that the mandatory biodiversity net gain requirement in development is a means to halting biodiversity decline and reversing this trend. Both options are therefore expected to support significant positive effects in relation to biodiversity and the natural environment. With evidence indicating that the cost burden in the increase from 10% to 20% is minimal and unlikely to render a development as

²⁰ [National Design Guide](#) (2021)

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unviable, Option BNG2 is considered for its potential to enhance the residual effects and is thus ranked more favourably than Option BNG1.

6.75 With regards to **natural resources**, biodiversity enhancements have the potential to deliver a range of ecosystem services which will support land, soil, and water resources. These include soil formation; flood and erosion protection; and water quality regulation. Both options are likely to support minor positive effects in this respect and Option BNG2 is ranked marginally higher than Option BNG1 given the enhanced level of (green) infrastructure development.

With respect to air quality, whilst Option BNG1 will provide benefits, Option BNG2 is likely to perform more favourably given green infrastructure enhancements will be a key element of biodiversity net gain (BNG). In this respect the provision of enhanced green infrastructure is recognised as an important element of the solution to addressing air pollution in built up areas, including through removing different types of air pollution (particulate matter, sulphur dioxide, nitrogen dioxide and ozone). As such, the increased requirement for net gain through Option BNG2 makes this option rank higher overall.

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7. Developing the preferred approach

- 7.1 This section explains the Council's preferred approach, considering the appraisal of reasonable alternatives in Section 6, and bringing it together with available evidence and Council and wider priorities.

Housing growth options

- 7.2 The Council's preferred option is Option H3: Develop additional areas within FRZ2/ 3 reflective of the current plan strategy (NB, this option is expected to boost contribution to housing supply and meet the lower end estimates for housing needs, but is still unlikely to meet housing needs in full using the standard methodology).
- 7.3 Option H3 is the preferred approach and is fully evidenced by the comprehensive assessment undertaken in HELAA, which identifies all deliverable and developable sites that could accommodate five or more new homes. Option H3 generates a housing target of 680 net additional homes per year and meets as much of the City's objectively assessed housing need, as set out in the HEDNA (2023) as possible, in line with current national policy. It takes forward all HELAA sites, in flood zones 1, 2 and 3, as either strategic sites, site allocations or identified housing sites in Appendices 2 and 3 of the draft Local Plan. The HELAA provides robust evidence to show that there are no other suitable, available or achievable sites that could be taken forward.
- 7.4 If housing supply relied on sites solely within flood zone 1, Portsmouth would have a more significant deficit of homes delivered over the plan period when assessed against the housing need (using the standard methodology). The inclusion of sites within all three flood risk areas still falls short of meeting Portsmouth's housing need, signifying the importance of their inclusion. There are no sites that have been omitted based on flood risk, and therefore careful consideration is given to management and mitigation of flood risk for the lifetime of development. Detail on how development of these sites will remain safe is provided within planning policy, both in terms of the general approach to flooding in Strategic Policy PLP21: Flooding and with regard to suitable site specific requirements for Strategic Sites and Site Allocations. Further detail can be found within the sequential and exception test contained with the SFRA.
- 7.5 The Council has an agreed Statement of Common Ground with the Environment Agency. This provides details on the agreed approach towards allocating sites within areas risk of flooding, as set out within the sequential and exception test. It also sets out the agreement towards the Council's approach on flood risk when determining development proposals.
- 7.6 This option takes account of a range of other relevant constraints, including nature conservation and transport, where careful consideration is given to impacts and risks, and how they can be mitigated and managed, which informs policy requirements.
- 7.7 This option applies residential yields of the strategic sites and site allocations, and residential density ranges for all other sites in line with the policy approach set in the draft Local Plan (PLP21: Residential Density). It seeks to optimise the use of land as far as possible, taking account of the varying development

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- potential within the City's diverse but confined area, in terms of local character and existing densities, public transport and access to a range of services and with regard to development viability and deliverability. This is supported by evidence contained within the Urban Characterisation Study, the Housing Density Background Paper (2021) and the Viability Study (2024).
- 7.8 Section 5 of this report details potential growth locations in the City and, alongside a number of other strategic sites, Tipner West and Horsea Island East is key to the draft Local Plan's development strategy. It seeks delivery of a marine employment hub alongside a new bridge and flood management measures. The housing element of the site, expected to deliver 814 to 1,250 new homes is enabling development, to achieve viability of marine employment hub while also making an important contribution to meeting housing needs in the City.
- 7.9 The draft Regulation 19 Local Plan gives consideration to responses to the Regulation 18 consultation, which presented three options for Tipner West and Horsea Island East: for an Innovative Sustainable Community, or super-peninsula, including 3,500 - 4,000 new homes and significant land reclamation; regeneration of the existing area; and to maintain the area in its current state ('do nothing'). The option for the super-peninsula received a high level of opposition and would have involved the reclamation of a considerable amount of land from Portsmouth Harbour, which is protected by multiple layers of nature conservation designations. The decision was made by Full Council in 2022 to abandon that scheme along with the do-nothing scenario for the site. The draft Regulation 19 allocation envisages a much reduced form of development and only allows a small amount of reclamation for the marine employment hub if it can be shown to be necessary for project viability or feasibility.
- 7.10 This option is assessed through the Habitats Regulations Assessment (HRA) supporting the Pre-Submission Local Plan. The objective of the HRA is to identify any aspects of the Local Plan that would cause Likely Significant Effects on, or adverse effects on the integrity of, internationally and nationally designated nature conservation sites. The HRA concluded that the Tipner West & Horsea Island East allocation will have adverse effects on the Portsmouth Harbour SPA / Ramsar site, because it will inevitably result in the loss of 0.2ha of inter-tidal protected habitats and (depending on the layout and quantum of development in any future planning application, and depending on evidence of viability and feasibility) may result in the loss of up to 0.5ha intertidal, 0.5ha subtidal, and 3.6ha terrestrial protected habitats. As a result, the policy can only be adopted if certain statutory derogation tests are met. Those tests require there to be: i) no feasible alternative solutions to the allocation; ii) imperative reasons of overriding public interest (IROPI) for the allocation to proceed; and iii) sufficient compensatory habitats available to ensure that there is no residual impact on the integrity on the Habitats sites. The HRA concluded that each of those tests was met. The preferred option provides the flood defences, land decontamination and new marine hub and seeks to minimise harm to the nature conservation designations.
- 7.11 The City Council have worked effectively and continuously with surrounding local authorities in the PFSH area with the intention of meeting unmet housing need under the Duty to Cooperate. The Fareham Local Plan, adopted in 2023

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(for a plan period to 2037) identifies 800 new homes to address unmet housing need in Portsmouth. The Council has formally requested a contribution to meet this unmet need from remaining PfSH neighbours, and will continue to engage on this matter. It will set out the detail of this cooperation in a series of Statement of Common Grounds with each local authority.

- 7.12 Option H3 has positive significant effects in relation to six out of ten Sustainability Appraisal objectives, as detailed in section 6. This includes for housing and healthy communities, economy, town centres and sustainable transport. While there are no significant effects relating to Objective 8. Urban Design, the high ranking of this option links to minor positive effects with regard to delivering good urban design, adequate housing standards and enhancements to local character. Two negative significant effects relate to historic environment and natural environment, but it is considered that these can be adequately mitigated for and managed through the draft Local Plan's policies.
- 7.13 Taking account of the above consideration of how this approach meets sustainability objectives and the findings of the comprehensive evidence base, Option H3 is the most sustainable approach compared to the reasonable alternatives.

Assessment of reasonable alternatives not taken forward in the draft Local Plan.

- 7.14 The following options are less favourable alternatives, and it is not recommended that they are taken forward in the Local Plan:
- **Option H1:** Develop all deliverable and suitable HELAA sites within Flood Risk Zone (FRZ) 1 (This option will fall significantly short of meeting housing needs).
 - **Option H2:** Maximise housing delivery (where possible) on all deliverable and suitable HELAA Sites within FRZ1 (NB, this option is still considered to fall significantly short of meeting housing needs).
- 7.15 Options H1 and H2 are not taken forward as they are expected to fall significantly short of meeting housing need. They also have notably fewer (two out of ten, as opposed to the preferred option's six out of ten) positive significant effects on sustainability objectives. They result in the same number of negative significant effects as the preferred approach. These two options also do not account for the potential role that mitigation and management of risks and impacts that the Council's evidence base provides, which can enable development, as detailed under the preferred approach.
- 7.16 Option H2 would be at odds with the approach to residential density established in the Urban Characterisation Study and the Housing Density Background Paper (2021) and could lead to an intensity of development on sites within Flood Zone 1 that could bring potential negative impacts to local character, housing standards, and a higher level of demand on local services (e.g. healthcare and schools) and amenities. This would not be considered to fit with the plan's six strategic objectives.

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- 7.17 Accounting for the above, these two options are less sustainable when considered against the preferred approach and other reasonable alternatives (Option H4, detailed below) and are not taken forward.
- **Option H4:** Maximise housing delivery (where possible) on sites, including sites within FRZ2/ 3 (NB, this option is expected to slightly exceed the supply anticipated under Option 3, but is still considered unlikely to meet housing needs in full using the standard methodology)
- 7.18 The majority of the factors considered in Option H3, the preferred approach, also apply to this option, but this one has the potential to deliver a higher number of new homes than that generated by the preferred approach. A number of sites, as outlined in section 5 of this report, would see an uplift in density and housing numbers. It is considered that this would be at odds with the approach to residential density established in the Urban Characterisation Study and the Housing Density Background Paper (2021). It could lead to an intensity of Development coming forward in locations across the city that leads to potential adverse impacts on local character, housing standards, historic environment and a higher level of demand on local services (e.g. healthcare and schools) and amenities than the preferred approach. This would have potential to undermine the plan's six strategic objectives.
- 7.19 The balance of positively and negative effects on sustainability objectives is very similar to the preferred approach, but based on the consideration of the above evidence, Option H4 is considered a less favourable option when compared against the preferred approach.

Employment Growth Options

Office development

- 7.20 The Council's preferred approach is Option OF1: An additional 42,500 sqm of office space focused at Lakeside Business Park. (HEDNA lower end estimate of need)
- 7.21 This follows evidence from the Council's HEDNA, which analyses demand for new office floorspace against different labour demand scenarios. Taking account of the shift to home and hybrid working following the Covid-19 pandemic, reduced levels of employment growth, replacement demand for office development and the trend towards 'flight to quality' where business occupiers and investors seek high-quality modern office space, the HEDNA's preferred alternative labour demand scenario leads to a recommendation for a requirement of around 42,500 sqm of office space. This will be largely delivered through Lakeside Strategic site, alongside smaller net gains through redevelopment of floorspace in the City Centre.
- 7.22 Significant positive effects are created by this option in relation to four SA Objectives on economy, town centres, housing and healthy communities. Employment growth and office occupancy is expected to support increased footfall and expenditure in City's town centres, development opportunities for housing (and jobs for new residents) and increased employment levels leading to better quality of life and health outcomes. However it should be noted that these significant benefits are also evident for the two reasonable alternatives for office development, as listed below.

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Assessment of reasonable alternatives not taken forward in the draft Local Plan.

- 7.23 The following options are less favourable alternatives, and it is not recommended that they are taken forward in the Local Plan:
- **Option OF2:** An additional 61,700 sqm of office space focused at Lakeside Business Park and the City Centre. (HEDNA top end estimate of need)
 - **Option OF3:** An additional 74,217 sqm of office space in the city within the city centre and at Lakeside Business Park (PfSH estimate of need)
- 7.24 Based on the HEDNA, these two options are not considered to be appropriate as a basis for establishing need for office floorspace.
- 7.25 The HEDNA states that at present there is little demand for office floorspace as shown by the net absorption rate and through discussions with local agents, although these do point to the need for smaller spaces in the City Centre over time, but less certainty regarding larger corporate space. Furthermore, it is important to note that overall, typically office based sectors, such as banking and accountancy, have lower representation in the City in comparison to advanced manufacturing.

Industrial/ warehousing development

- 7.26 The Council's preferred approach is Option IF5: An additional 96,300 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites (HEDNA top-end estimate of need).
- 7.27 This option is based on the recommendation of HEDNA's preferred alternative labour demand scenario, which shows 96,300 sq.m should be used for estimating future requirements of manufacturing and warehousing. This preferred option is considered appropriate in light of any need to test economic-led housing need.
- 7.28 This will be delivered at strategic sites, site allocations and through completion of extant permissions. There is also opportunity for intensification and making better use of land in existing industrial areas. The Council's HELAA and the Approach to Employment Land Study by BE Group also highlight intensification opportunities on existing industrial/ warehousing sites for further development, which may come forward during the plan period as windfall development.
- 7.29 Significant positive effects are created by this option in relation to four SA Objectives on economy, town centres, housing and healthy communities.

Assessment of reasonable alternatives not taken forward in the draft Local Plan.

- 7.30 The following options are less favourable alternatives, and it is not recommended that they are taken forward in the Local Plan:
- **Option IF4:** A net loss of industrial/ warehousing space (-42,800sqm). It is assumed this would be achieved through proposed changes of use at (some) existing industrial employment sites. (HEDNA lower-end estimate of need).

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- **Option IF6:** An additional 210,214 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites. (PFSH estimate of need

- 7.31 The HEDNA states that overall the labour demand (alternative) and net completions ranges are considered to be more appropriate whilst still planning positively for growth. These show a range from around 75,500 sq.m to 96,300 sq.m) and the preferred option is at the upper end of this range.
- 7.32 It is clear that a net loss of industrial/warehousing premises in the City would not have a positive effect on the economy of the City. Manufacturing including the maritime and engineering employment sectors related to naval activity and research would not benefit from a net reduction in floorspace.
- 7.33 Equally the provision of a quantum of floorspace that is substantially above need could flood the market and thus not deliver tangible benefits to the economy of the City.

Houses in Multiple Occupation (HMOs)

- 7.34 The Council's preferred option is **Option HMO4: 10% limit within the 50m radius of the application site.**
- 7.35 The Council has for several years sought a balanced approach to the management of HMOs in an effort to create mixed and balanced communities and to ensure that HMOs, with associated social, environmental and amenity impacts, are not heavily concentrated in a given area. The Council's 2019 Supplementary Planning Document on HMOs identifies that "a community will be considered imbalanced where more than 10% of residential properties within a 50m radius of the area surrounding the application property are already in HMO use". This seeks to ensure a mix of housing types and sizes, to meet a range of local housing needs. This threshold has been used successfully in Portsmouth for over five years and is also used by two thirds of local authorities across the country that control HMO proliferation.
- 7.36 It is also important to recognise the role that HMOs play in meeting an element of affordable housing supply, as highlighted in the Council's HEDNA. The preferred approach (Option HMO4) is considered to allow this tenure of housing reasonable scope to meet that need while maintaining balanced communities.
- 7.37 Option HMO6 and to a lesser extent HMO5, while having greater potential to meet an element of need for affordable housing and bring potential for minor positive benefits for economy and town centres sustainability objectives, could lead to a minor negative effects, as highlighted in section 6. These communities would be considered imbalanced, with greater potential for negative social, environmental and amenity impacts on local communities, which would be focused in areas that already have high concentrations of HMOs (Southsea, St Thomas and St Jude). This policy option is not considered an appropriate way forward when considered against the appraised alternatives and is not taken forward the in draft Local Plan.
- 7.38 The assessment in section 6 also shows that applying HMO1 at 0% (no additional HMO development) or a more stringent cap (HMO2 and HMO3 at a 5% limit with 50m or 100m radius of the application site) could lead to minor

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negative effects by restricting opportunities to meet additional need for HMOs over the plan period. It should be noted that application of such a policy would not be expected to prevent demand for HMOs, even with policy compliant delivery of affordable housing (due to the level of need for affordable housing set out in HEDNA) and would simply shift demand for this development elsewhere. A lower limit option (HMO1, HMO2 and HMO3) could essentially cap new HMO development in areas where they are already concentrated (above the 5% limit) and would be likely to lead to a dispersal of HMO development to nearby areas, where concentrations are currently lower. This could lead to (minor) negative effects arising more widely across the City, with any benefits being seen in areas with already high concentrations of HMOs, where any further concentration would be halted.

- 7.39 For this reason, HMO1, HMO2 and HMO3 are not considered a suitable way forward when considered against the alternatives, and are not taken forward in the draft Local Plan.

First Homes

- 7.40 The Council's preferred approach is Option FH1: 0% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.
- 7.41 This is because there is no evidenced requirement for First Homes in Portsmouth, as part of delivery of affordable housing. Shared ownership is an important and proven route to affordable home ownership due to the lower deposit needed to secure a property compared to First Homes. The Council's HEDNA shows only a small gap in the incomes needed to buy or rent a home in the City, and therefore very little need for First Homes.
- 7.42 Shared ownership is considered to offer a genuinely affordable alternative to market homes which carries greater benefits to people in Portsmouth.
- 7.43 Evidence in the HEDNA and Local Plan Viability Study show there are viability issues in delivering either the Government's recommended threshold of 25% (Option FH3), or a lower level of 10% (Option FH2) of affordable homes as first homes. This carries the risk of detrimentally impacting the delivery of other affordable tenures that the Council deem as priorities, specifically affordable and/or social rent and Shared Ownership. It could leave the Council at risk of having reduced numbers or no affordable homes provided through development, for viability reasons. For this reason, Option FH2 and Option FH3 are not taken forward in the draft Local Plan.
- 7.44 In terms of appraisal against sustainability objectives, all options were neutral (had no significant) effects. The options form a percentage of the affordable housing requirement from development, and development location remains the same. The sustainability objectives most likely to be affected by the different options are housing, healthy communities and the economy, where the preferred approach (Option FH1) has minor positive effects, and lead to it being ranked first under these three objectives. For the reasons outlined above, Option FH1 with its target of 0% First Homes as part of affordable housing provision is considered best suited to meet local housing needs in the City, while ensuring that the draft Plan's wider approach to affordable housing delivery is viable and deliverable.

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Biodiversity Net Gain (BNG)

- 7.45 The Council's preferred approach requires 10% BNG on all developments, with the exception of three predominantly Council owned sites (Portsmouth City Centre North, Somers Orchard and Lakeside) where 20% is required. This is considered to strike a balance between meeting the national BNG requirement (10%) while supporting the Council's aspiration to exceed the minimum requirement on key Council owned sites. It offers a pragmatic solution which will help deliver measurable improvements to biodiversity while remaining achievable and viable.
- 7.46 The City Council is also pursuing the delivery of offsite BNG on City Council owned land in order to maximise the benefits of BNG delivery in the City.
- 7.47 Both options below achieve positive significant effects for sustainability objectives on climate change, flooding and coastal change, and natural environment. While minor positive effects support higher ranking for Option BNG2, adverse impacts on viability (noted below under Option BNG2) and therefore the deliverability of planned development mean that a 10% net gain on all development, with the exception of the three predominantly Council owned sites named above, is considered the appropriate as the preferred approach.
- 7.48 As discussed the preferred approach falls between the two alternative options, which are appraised separately below.

Option BNG1: require 10% net gain in all developments.

- 7.49 The City Council considered this approach as it would be in line with the approach set to become the national requirement from 2024 (schedule 14 of the Environment Act 2021). In March 2023 the elected members of Portsmouth City Council indicated that the Council should look to exceed this minimum requirement on City Council owned land. Taking this target was felt to be insufficiently ambitious and did not show the leadership on BNG and the environment that members considered the Council should be taking with its own landholdings.

Option BNG2: require 20% net gain in all developments.

- 7.50 The City Council considered this approach in order to look at options be more ambitious in regard to BNG and the environment. The Local Plan Viability Study (2024) tested development viability of different levels of BNG in the city and found that at 20% BNG, viability of some schemes may decrease. This option is therefore not being pursued at this time. The City Council recognises that BNG is just one of a suite of tools available to it to deliver environmental benefits in the City. The emerging local Plan PLP38) is also requiring development to meet the five standards set out in the Natural England Green Infrastructure Framework The Urban Nature Recovery Standard comprising; The Urban Nature Recovery Standard; Urban Greening Factor; Urban Tree Canopy Cover Standard; Accessible Greenspace Standards and the Green Infrastructure Strategy.

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Part 2: What are the SA findings at this current stage?

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8. Introduction (to Part 2)

8.1 The aim of this chapter is to present an appraisal of the Local Plan, as to be published under Regulation 19 of the Planning Regulations.

Methodology

- 8.2 The appraisal identifies and evaluates ‘likely significant effects’ of the plan on the baseline, drawing on the ten SA objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 8.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Local Plan in more general terms.
- 8.4 Finally, it is important to note that effects are predicted taking account of the effect characteristics and ‘significance criteria’ presented within Schedules 1 and 2 of the SEA Regulations.²¹ So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects.

Adding structure to the appraisal

- 8.5 Whilst the aim is essentially to present an appraisal of ‘the plan’ under each of the SA objectives,²² it is appropriate to also give stand-alone consideration to elements of the Plan. As such, within the appraisal narratives below, sub-headings are used to ensure that stand-alone consideration is given to distinct elements of the Plan. Within these narratives, specific policies are referred to only as necessary (i.e., it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability objective).

²¹ Environmental Assessment of Plans and Programmes Regulations 2004

²² Regulations require simply an appraisal of ‘the plan’.

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9. Appraisal of the Local Plan

9.1 The appraisal of the Draft Plan is presented under the ten SA objectives established through scoping (see **Table 3.1**). For each objective the spatial strategy is explored followed by the city-wide policies. Cumulative effects are also explored before a conclusion is reached. Strategic sites and site allocation policies do not repeat city-wide policies so all sections should be read in conjunction.

SA-1: Building a strong, competitive economy in Portsmouth

Commentary on the spatial strategy

9.2 Economic forecasting, taking account of the city's growth aspirations, sectoral strengths and past employment land take up, has informed the economic growth strategy for the Plan. **Policy PLP25** (Employment Target) outlines that the Council will make overall provision for at least 138,429m² of new employment floorspace during the plan period (2020-2040). This will include 58,645m² of office floorspace (class E); 15,270m² of research and development / industrial processes floorspace (class E); and 64,514m² of manufacturing / warehousing floorspace (class B2 / B8).

9.3 Employment and/or commercial floorspace will be provided across five of the seven strategic sites and at one site allocation as follows:

- **Tipner West & Horsea Island East** will deliver a marine hub with a working quayside and up to 58,000m² of marine employment floorspace (classes E, B2 and B8). This will create new jobs in this key growth sector of the economy and capitalises on opportunities associated with the deep water access provided here.
- **Tipner East** will deliver 716m² of commercial floorspace (classes E, F1 and F2), alongside 840m² ancillary commercial uses at a new transport hub. The development is expected to improve sustainable transport connections with the centre, to better unlock both this site and Tipner West & Horsea Island.
- **Lakeside North Harbour** will deliver 50,000m² of new office floorspace (class E). Most of this will be delivered through intensification of the site with the redevelopment of a proportion of the extensive surface level car parking on the site. Policy PLP5 (Lakeside North Harbour) states that if a robust marketing campaign of at least twelve months, its scope having been agreed in advance by the local planning authority, clearly demonstrates that there is insufficient market demand for new offices at this location, development proposals for other commercial uses that complement the existing office park will be allowed. This will allow flexibility in economic uses over the plan period, recognising that office working patterns continue to change in the wake of the pandemic.
- **Portsmouth City Centre** will deliver 20,000m² (gross – 1,546m² net) of office floorspace. Policy PLP6 (Portsmouth City Centre) outlines that development proposals will be permitted provided that they enhance the

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range of commercial uses in the City Centre. It also states that proposals falling within the City Centre Commercial Area should include town centre uses at ground floor level.

- **Fratton Park & the Pompey Centre** will deliver an expansion to the football stadium to increase the capacity from 21,000 to 26,000-30,000. It will also include a supporting hotel (approximately 145 rooms) and mixed conference and event facilities.
- **Land West of Portsdown Technology Park** is also allocated for 12,500m² of commercial floorspace (as a site allocation).

9.4 Provisions are therefore targeted in the most accessible areas of the city or at strategic locations that support key economic growth sectors. Additionally, the St James and Langstone Campus site (Strategic Site policy PLP8) is allocated to deliver new educational facilities that support improvements to the educational and skills development offer in Portsmouth.

Commentary on city-wide policy provisions

- 9.5 Alongside the new allocations discussed above, existing employment land is safeguarded through **Policy PLP26** (Safeguarding Employment Land). The policy encourages proposals for the redevelopment of existing employment premises that provide improved employment accommodation, make more efficient use of land, and provides a similar number of jobs. Development proposals for the change of use of land / premises from employment purposes to non-employment purposes will only be permitted where the land / premises is not fit for purpose for employment. In such cases, the policy prioritises other commercial uses.
- 9.6 Additionally, **Policy PLP27** (Employability & Skills) seeks to support a strong local workforce. The policy supports development proposals which, at both the construction and occupation stages of the scheme, a) raise local skill levels and increase employability; b) tackle skill shortages in existing and potential business sectors; c) address barriers to employment for economically inactive people; and d) provide or contribute to childcare facilities within or near employment sites.
- 9.7 **Policy PLP28** also supports the growth and development of identified centres in Portsmouth's Town Centre Hierarchy which will continue to contribute to a thriving economy and continued economic investment in these areas.
- 9.8 **Policy PLP30** (Cultural and Visitor Economy) supports development proposals that maximise the potential of the cultural and visitor economy and drive forward culture led regeneration. Such opportunities are sought to be maximised in the centres identified in the town centre hierarchy, particularly the Cultural Quarter and the Core Commercial Area of the City Centre. Development proposals for culture, leisure, entertainment, visitor attractions, and accommodation and creative industries will only be permitted where they meet the criteria set out within the policy.
- 9.9 Furthermore, the Local Plan seeks to deliver the ambitious growth targets set for the City in the Portsmouth Economic Development and Regeneration Strategy including 7,000 new jobs. **Policy PLP50** also requires appropriate

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contribution to supporting infrastructure which includes educational infrastructure development needs.

Cumulative effects

9.10 The economy of Portsmouth is of sub-regional importance, with the International Port, naval presence and key sectors in defence, aerospace, and advanced manufacturing and technology, as well as tourism, cultural, digital, and creative industries stemming from the city's maritime influence. The support for economic growth and access to training and education is considered likely to lead to **cumulative positive effects** in the wider sub-region.

Conclusions

9.11 The spatial strategy and policy provisions of the draft Plan are considered for their potential to support the strategic objectives of the Plan to enable a strong and diverse economy that raises the quality of life and access to education and training opportunities for all. Overall **significant positive effects** are considered likely as a result.

SA-2: Ensuring the vitality of the city centre and other town centres in Portsmouth

Commentary on the spatial strategy

9.12 **Policy PLP28** (Town Centres) supports development proposals that contribute towards the growth and development of identified centres in Portsmouth's Town Centre Hierarchy. It outlines that development proposals should provide main town centre uses within the city, town, district, local and neighbourhood centres that contribute positively to the function, vitality, and viability of the centres. Policy PLP28 states that the Core Commercial Area should be promoted and enhanced as the heart of the centre. It will be the focus for retail, commercial, leisure, culture, civic and service users, with active street frontages encouraged at ground floor level.

9.13 The ways in which the strategic sites and site allocations will contribute towards the vitality of centres in Portsmouth are outlined below:

- **Tipner West & Horsea Island East, Tipner East, Lakeside North Harbour and Horsea Island Open Space** will together contribute to the vitality of Tipner, Horsea Island and Cosham through mixed-use development. Notably, Tipner West & Horsea Island East will include shops selling essential goods, including food, where the shop's premises do not exceed 280m².
- **Portsmouth City Centre** will strengthen the identity and vitality of the city centre by delivering new homes, business premises, social / leisure venues, and community facilities. Policy PLP6 (Portsmouth City Centre) outlines that development proposals will be permitted if they encourage and support culture, arts, civic and leisure uses that add to the area's distinctiveness as the cultural, community and civic heart of the city centre.

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- **Fratton Park & the Pompey Centre** will contribute to the vitality of Fratton by regenerating the area around the football stadium. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development must incorporate active frontages and entrances that promote activity and successfully engage with the public realm particularly along the off-road pedestrian and cycle route and in other appropriate locations.
- **St James' & Langstone Campus** will deliver medical facilities, educational facilities, and recreation, sports and other community facilities, contributing to the vitality of this part of Portsmouth.
- **Land West of Portsdown Technology Park**, which is allocated for 12,500m² of light industrial/ Research and Development floorspace, will contribute to the vitality of Paulsgrove.

Commentary on city-wide policy provisions

- 9.14 In addition to the strategic sites and site allocations discussed above, **Policy PLP29** (Small Local Shops) supports development proposals for small local shops or services outside the City, town, district, local and neighbourhood centres if they meet the criteria set out within the policy. This includes, but is not limited to, the requirement for the shop to primarily sell essential goods and provide services that meet day-to-day shopping and service needs, such as food, to visiting members of the public.
- 9.15 Also of relevance, **Policy PLP49** (Public Realm) supports development proposals that consider opportunities to enhance the public realm in their design. This is to ensure that the public realm is safe, healthy, accessible for all, inclusive, multifunctional, attractive, well-connected, legible, and easy to maintain, and that it relates to the local, cultural, and historic context. Public realm enhancements will ultimately boost user experience and support long-term vitality at town centres.
- 9.16 Finally, **Policy PLP52** (New & Existing Community & Leisure Facilities) is in place to ensure that development proposals for new and/or expanded community and leisure facilities are accessible and inclusive to the local communities it serves.

Cumulative effects

- 9.17 The city has a wider draw as a major cultural, commercial and tourism centre for the sub region. The suggested improvements are likely to support the long-term vitality of centres in Portsmouth, particularly within the City Centre which forms much of the draw for tourism and culture. **Positive cumulative effects** are considered likely overall.

Conclusions

- 9.18 The detailed guidance and support provided for Portsmouth's centres, including growth at key locations, are considered to provide significant support for long-term vitality. As a result, **significant positive effects** are anticipated overall.

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SA-3: Promoting sustainable transport in Portsmouth

Commentary on the spatial strategy

- 9.19 Portsmouth's relatively compact size lends itself to walking and cycling and it is well connected to the wider region and to London and Europe by rail, ferry, and road. Sustainable transport is a key consideration for Portsmouth in future growth, reflecting the context of a climate emergency, issues with poor air quality, and the strategic transport network in Portsmouth dominated by its maritime influences. Alongside many other busy cities around the UK, Portsmouth has been identified as a city that needs to reduce air pollution levels as quickly as possible. In Portsmouth, the main pollutants are principally the products of combustion from road traffic – mainly nitrogen dioxide (NO₂). There are currently five Air Quality Management Areas (AQMAs) predicted to exceed the annual NO₂ National Air Quality Objective (NAQO) and the Council declared a charging Clean Air Zone (CAZ) in 2021. The CAZ has seen 94% of monitored areas comply with air quality standards. Despite this, government assessments reveal a critical need for it to be continued as data reveals persistent challenges in specific locations. There are three areas that continue to have pollution levels above the limits set by Government and a further nine that also continue to be at risk of exceeding. PCC are therefore working in collaboration with the Joint Air Quality Unit (JAQU) to understand why success was not achieved when expected.
- 9.20 The merits and constraints associated with the strategic sites allocated through the draft Plan, alongside how site-specific policy seeks to positively impact this objective and address constraints, are outlined below:
- **Tipner West & Horsea Island, Tipner East and Horsea Island Open Space** are located immediately adjacent to the M275 motorway at the northwest part of Portsea Island. Tipner West and Tipner East are in proximity to the Portsmouth AQMA No. 11 which covers a section of the M275 motorway to the south. Policy PLP3 (Tipner West & Horsea Island East) outlines that a segregated bus way between Tipner West and Horsea Island via a new bridge and on to Port Solent will be established and operated. Meanwhile, Policy PLP4 (Tipner East) outlines that the development of a new multi-modal transport hub for the city is a key component of the vision for Tipner East. Both policies outline that development proposals will be permitted provided that they:
 - Break down the barriers, both physical and perceived, created by the M275 motorway and Portsbridge Creek.
 - Incorporate car-free streets wherever feasible with reduced car parking standards and enhanced cycle parking with 'Mobility as a Service' and sustainable transport modes prioritised.
 - Improve off-road pedestrian and cycle provision.
 - Provide safe and efficient vehicular access to and from the M275 and the surrounding non-strategic road network; and

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 - Safeguard the routes of the Pilgrims Trail, the King Charles III England Coast Path and National Cycle Route 22 which pass through Tipner East (Policy PLP4 only).
 - Deliver or contribute proportionately to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/ or Infrastructure Delivery Plan.
- **Lakeside North Harbour** is bound by the strategic road network; the M27 to the south, A27 to the east and north, and M275 to the west. A shared footpath / cycle way runs to the north of the site, linking it to the city and the wider area, and a shuttle bus runs to the nearby Cosham District Centre, where Cosham Railway Station is located. To promote sustainable modes of travel to and from the site, the Plan states that all development proposals to expand the business offer must safeguard and where possible enhance pedestrian and cycle links to the City Centre and Cosham. Policy PLP5 (Lakeside North Harbour) outlines that development proposals will be permitted provided that:
 - Effective access arrangements are made that are safe and suitable for all users. A new secondary access point at Lakeside to be provided on to the Western Road (A27) in accordance with the general arrangement plan of the Strategy Transport Assessment or such alternative as may be developed and agreed with PCC Highways.
 - A Travel Plan is made to minimise car use by current and prospective occupants of Lakeside and to maximise use of sustainable modes of transport.
- **Portsmouth City Centre** extends from Hope Street in the north to Guildhall Walk and Winston Churchill Avenue to the south. The site contains Portsmouth & Southsea Railway Station. However, a railway viaduct forms a physical barrier to the area to the south. It overlaps with Portsmouth AQMA No. 11 in the north and Portsmouth AQMA No. 7 in the south. Policy PLP6 (Portsmouth City Centre) outlines that development within the Station Road Regeneration Area should contribute to improved connectivity within the City Centre. In addition, Policy PLP6 outlines that development proposals will be permitted if they:
 - Improve pedestrian and cycle connectivity to the surrounding residential areas.
 - Incorporate car-free streets wherever feasible, with 'Mobility as a Service' and sustainable transport modes prioritised.
 - Ensure air quality in adjoining AQMAs is not worsened; and
 - Provide a Travel Plan to demonstrate how it is contributing to a shift to sustainable modes of transport in the City Centre.
- **Fratton Park & the Pompey Centre** is in proximity to Fratton Railway Station and is well served by the bus network. However, the existing road layout and location of the railway line prevent easy pedestrian and cycle movements to and throughout the site. It is also adjacent to Portsmouth AQMA No.9 to the east. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that an appropriate off-road pedestrian and cycle route connecting Fratton Station to the Pompey Centre and Fratton Park shall be provided

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with wider public realm improvements. Policy PLP7 also outlines that development proposals will be permitted provided that:

- An appropriate, accessible off-road pedestrian and cycle route connecting Fratton Station to the Pompey Centre and Fratton Park is provided.
 - Effective access arrangements are made that are safe and suitable for all users; and
 - A Travel Plan and Transport Assessment must be submitted as part of any proposal. These must assess the potential transport impacts and implications, propose mitigation measures, and identify opportunities to implement effective sustainable transport initiatives.
- **St James' & Langstone Campus** is located away from the primary road network. Policy PLP8 (St James' & Langstone Campus) outlines a Travel Plan and Transport Assessment must be submitted as part of any proposal. These must assess the potential transport impacts and implications, propose mitigation measures, and identify opportunities to implement effective sustainable transport initiatives. Policy PLP8 also outlines that development proposals will be permitted if they:
 - Provide safe, permeable, and convenient north-south pedestrian and cycle links from Locksway Road to Longfield Road and across the wider site (St James).
 - Provide off-site highway network improvements (St James).
 - Retain and enhance the north-south bus / cycleway connection along Furze Lane (Langstone Campus).
 - Provide safe accessible off-road walking and cycling routes through the site are provided, linking areas to the north and south (Langstone Campus).

9.21 Five of the six sites allocated through the draft Plan are all located in sustainable locations, particularly **Somers Orchard** and **Former St John's College Southsea**, which are in/ near the city centre. Fraser Range is considered slightly more distant. In terms of non-strategic sites, whilst site-specific policies play a role, it is considered that the draft city-wide policies (explored under the next heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites manage the potential negative effects arising from development.

Commentary on city-wide policy provisions

9.22 Air quality is primarily addressed through **Policy PLP35** (Air Quality and Pollution), which states that planning permission will only be granted for development proposals when it can be demonstrated, in a proportionate manner, that they will not contribute to and will not be subject to unacceptable levels of pollution which cannot be mitigated.

9.23 The focus of transport is **Policy PLP47** (Movement and Transport), which states that development proposals will be permitted where they help deliver a people centred travel network that prioritises walking, cycling, public and shared transport, in line with Local Transport Plan 4 (LTP4). The policy

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supports growth in highly accessible locations with good access to public transport services and other sustainable transport. It also addresses safety by ensuring that development proposals give priority to the needs of pedestrians, cyclists, users of mobility aids, and other non-motorised forms of transport.

9.24 **Policy PLP48** (Access and Parking) states that development will be permitted where it is located and designed in such a way that it seeks to discourage car use and encourages travel by other modes, unless off street parking provision can be justified. This could include car free development. Development proposals should incorporate charging points for electric vehicles (EVs) and secure cycle storage and encourage car share schemes.

9.25 More broadly, **Policy PLP49** (Public Realm) supports development proposals that consider opportunities to enhance the public realm in their design. This includes encouraging walking and cycling and easing the movements of pedestrians, cycles, cargo-bikes, scooters, pushchairs, wheelchairs, mobility scooters and vehicular traffic within the site and to wider focal points within the city. In addition, **Policy PLP50** (Infrastructure Delivery) is in place to ensure that development proposals include suitable infrastructure provision.

Cumulative effects

9.26 The Plan recognises and supports wider city and sub-regional aspirations for transport, including LTP4. The draft Plan supports the provisions of the city's transport plan which implemented a Clean Air Zone in Portsmouth in 2021. The Plan also provides wider support for air quality, particularly through focused efforts to improve sustainable transport connections and reduce the need to travel. On this basis, **positive cumulative effects** are considered likely.

Conclusions

9.27 Overall, the Plan seeks to deliver new infrastructure improvements and prioritises sustainable transport access, particularly active travel, in direct support of the strategy objectives for a healthy and happy city, a green city and a city with easy travel. The Plan also requires development to mitigate its impact on the strategic and local road network. As a relatively compact and accessible city, **long-term minor positive effects** are considered likely overall.

SA-4: To tackle climate change, flooding and coastal change in Portsmouth

Commentary on the spatial strategy

9.28 The construction of new homes and the increase in number of dwellings in the city will ultimately increase pressures on existing highways infrastructure and affect air quality and overall emissions. The spatial strategy seeks to maximise opportunities to facilitate growth in sustainable locations, which are supported by infrastructure and sustainable transport choices, and which reduce the need to travel (see SA objective 3).

9.29 Focusing growth at strategic sites at the City Centre and other town centres, the Plan presents opportunities to incorporate strategic measures to address climate change and per capita emissions, such as district heating systems, new

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open spaces, sustainable travel opportunities, and strategic green infrastructure provisions. In terms of accessibility, sites within the City Centre, Fratton, and Cosham are located within 800m of a train station and considered overall as highly accessible locations – particularly within the City Centre.

9.30 Seeking higher residential densities in areas of high accessibility such as transport nodes / corridors and retail areas is considered to contribute positively towards meeting climate change objectives, supporting the vitality of local retail areas and the promotion and use of sustainable transport. This could have secondary positive effects for climate change mitigation from a greater level of self-containment and the lower emissions from reduced personal vehicle use.

9.31 Portsmouth's low-lying coastal location means that the city is susceptible to flood risk, not only from inundation but also surface water, rising ground water levels and possible wastewater infrastructure overflow during extreme weather events. With much of Portsmouth constrained by flood risk (notably large areas in the north, east, and south of Portsmouth), the spatial strategy includes allocations located within Flood Risk Zones 2 and 3, particularly within areas reliant on existing and future flood defences.

9.32 The flood risk associated with the strategic sites allocated through the draft Plan, alongside how site-specific policy seeks to address this, is outlined below, recognising that policy has been informed by the Level 2 Strategic Flood Risk Assessment (SFRA):

- **Tipner West & Horsea Island East** and **Tipner East** are flat and low-lying and a significant part of Tipner West and Tipner East lie in Flood Zones 2 and 3. They were assessed as part of the Level 2 Strategic Flood Risk Assessment, which made a number of recommendations to avoid and control flood risk. These recommendations include a sequential approach to land use planning within the site, new flood defences, ground raising, secondary defences, and future-proofing. Tipner West & Horsea Island will deliver urgently required sea defences for the northern part of Portsea Island, whilst Tipner East will involve the installation of flood barriers prior to the commencement of development. Policies PLP3 (Tipner West & Horsea Island East) and PLP4 (Tipner East) outline that development proposals will be permitted provided that they integrate green and blue infrastructure into the masterplanning and design of the development and seek to mitigate the urban heat island effect and uncomfortable / unsafe wind conditions.
- **Lakeside North Harbour** is entirely within Flood Zone 1. However, it is estimated that in 100 years much of the site, which was built on reclaimed land, will be in Flood Zones 2 and 3. The site was assessed as part of the Level 2 Strategic Flood Risk Assessment, which made a number of recommendations to avoid and control flood risk. Policy PLP5 (Lakeside North Harbour) outlines that development proposals will be permitted provided that a site-specific Flood Risk Assessment will be prepared in accordance with the recommendations of the Strategic Flood Risk Assessment Levels 1 and 2 supporting the Plan. This is in addition to the provision of Sustainable Drainage Systems (SuDS) to mitigate the risk of surface water flooding.

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- **Portsmouth City Centre** is entirely within Flood Zone 1 but in 100 years, the southwest extent is expected to be in Flood Zone 2.
- **Fratton Park & the Pompey Centre** is entirely within Flood Zone 1 and this is unlikely to change in 100 years. However, Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development proposals will be permitted if they provide SuDS to mitigate the risk of surface water flooding.
- **St James' & Landstone Campus** is entirely within Flood Zone 1. However, it is estimated that in 100 years the eastern extent of the site will be in Flood Zones 2 and 3. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted provided that a site-specific Flood Risk Assessment will be prepared in accordance with the recommendations of the Strategic Flood Risk Assessment Levels 1 and 2 supporting this Local Plan. This is in addition to the provision of SuDS to mitigate the risk of surface water flooding.
- **Horsea Island Open Space** is entirely within Flood Zone 1 and this is unlikely to change in 100 years.

9.33 With regards to the site allocations, **The News Centre, Port Solent,** and **Fraser Range** are within Flood Zones 2 and 3.

Commentary on city-wide policy provisions

- 9.34 Notably, plan development has been supported by the development of a Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2, which has sought to assist the Council in identifying appropriate avoidance and mitigation requirements for development within areas at risk of flooding and has fed into the policies being proposed.
- 9.35 With a focus on climate change adaptation, **Policy PLP36** (Coastal Zone) outlines that development proposals in the Coastal Zone will be permitted where they, amongst other considerations, are consistent with the Shoreline Management Plan and South Inshore and South Offshore Marine Plans.
- 9.36 **Policy PLP31** (Flooding) outlines criteria for development proposals that will need to be met to be permitted. This includes, but is not limited to, where they seek to reduce the impact and extent of all types of flooding; are accompanied by a site-specific Flood Risk Assessment; and the proposal meets the sequential and exception tests as set out in Government policy and guidance.
- 9.37 Adding on to the above, **Policy PLP32** (Sustainable Drainage Systems) supports the use of SuDS to manage surface water flood risk. Development proposals will be permitted where they ensure that surface run-off rates from the proposed development do not exceed the existing surface run-off rates (with a betterment preferred). Policy PLP32 also outlines that all applications should minimise the amount of hard landscaping and incorporate permeable surfaces and methods for rainwater harvesting to reduce surface water run-off.
- 9.38 With a focus on climate change mitigation, **Policy PLP2** (Climate Emergency) outlines that development proposals will be supported if they meet the criteria set out within the policy. This includes, but is not limited to, reducing greenhouse gas emissions and storing carbon; delivering a net zero energy standard in new buildings; and adapting and being resilient to the impacts of local climate change.

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- 9.39 **Policy PLP33** (Sustainable Construction and Onsite Renewable Energy) outlines that development proposals will be permitted where they are designed to reduce their impact on the environment during construction. This includes considering embodied emissions and the energy hierarchy. Importantly, the retention and retrofitting of existing buildings will be prioritised over demolition and replacement.
- 9.40 Finally, **Policy PLP34** (Renewable Energy) supports development proposals for wind turbines and solar photovoltaic arrays in appropriate locations provided they do not result in adverse impacts on living conditions. Development proposals for community renewable and low carbon energy generation developments will also be supported.

Cumulative effects

- 9.41 The Plan aligns with the wider flood risk and coastal management plans in place for the city and Solent region. The Plan seeks to work in tandem with the Shoreline Management Plan to ensure coastal defences will be resilient to long term coastal change and sea level rise. The Council will continue to work with the Environment Agency to achieve the best possible outcomes for new development and flood risk along the shoreline, including at Tipner.
- 9.42 Whilst increased pressures from further development in this coastal region have the potential to lead to cumulative adverse effects in relation to coastal change and sea level rises, the policy provisions which seek to deliver more sustainable development with increased flood and climate resilience are likely to ensure that significant cumulative effects are avoided.

Conclusions

- 9.43 The strategic growth locations can support a good mix of uses within the city and lead to economies of scale to the benefit of climate resilience. Particularly by enabling the delivery of new or upgraded transport infrastructure, low carbon heat and power, flood resilience measures, and community infrastructure and open spaces, and positive effects are anticipated in this respect. Flood risk is a key constraint to growth in the city, and flood resilience in line with the proposed policy provisions will be key to ensuring that long-term adverse effects are avoided. However, as the plan strategy includes housing within high flood risk zones, **minor negative effects** are concluded.

SA-5: Delivering high quality homes in Portsmouth

Commentary on the spatial strategy

- 9.44 The Plan sets a housing target of at least 13,603 net additional homes during the plan period (2020-2040) under **Policy PLP16** (Housing Target). This equates to a net annual provision of approximately 680 homes per year. Given the geographical constraints to development in Portsmouth, the Council are pursuing a supply-led strategy, accepting that housing needs as calculated by the NPPF standard methodology cannot be met with the land available for development in the City.
- 9.45 New homes will be delivered across five of the seven strategic sites allocated through the draft Plan, as follows:

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- **Tipner West & Horsea Island East** will deliver 814-1,250 new homes.
- **Tipner East** will deliver 1,056 new homes.
- **Portsmouth City Centre** will deliver 4,158 new homes.
- **Fratton Park & the Pompey Centre** will deliver 710 new homes.
- **St James' & Langstone Campus** will deliver 417 homes including elderly person and sheltered accommodation.

9.46 Five of the six site allocations will also deliver new homes, as follows:

- **Port Solent** will deliver 500 new homes.
- **St John's College** will deliver 212 new homes.
- **Fraser Range** will deliver 134 new homes.
- **The News Centre** will deliver 100 new homes.
- **Somers Orchard** will deliver 565 new homes.

9.47 Recognising the constraints to development in the city, the Council identify that housing needs will not be met within the City's administrative boundary. Partnership working, including as part of the Partnership for South Hampshire (PfSH), has sought to agree where the identified shortfall in housing supply could be delivered outside of the city's administrative boundary through the Duty to Cooperate. **Policy PLP16** outlines that 800 homes allocated in the Fareham Local Plan will contribute to Portsmouth's unmet need.

Commentary on city-wide policy provisions

9.48 Affordable homes are addressed through **Policy PLP17** (Affordable Homes), which outlines that development proposals where more than 10 residential dwellings will be provided (or where the site has an area of more than 0.5ha), will be permitted where they: a) provide 30% of residential dwellings as affordable homes; b) provide the tenure mix of affordable homes as 70% affordable rent and/ or social rent and 30% as another affordable route to home ownership (including shared ownership or discounted market sales housing); and c) are indistinguishable in design and appearance from the open market houses and integrated throughout the site.

9.49 Housing mix is addressed through **Policy PLP18** (Housing Mix), which states that development proposals for residential development, including as part of a mixed-used development, will be permitted where they provide a mix of dwelling sizes to meet projected future household needs for the City. Policy PLP18 outlines the housing mix in terms of size for both market homes and affordable homes (both owned and rented). It also highlights that all homes are to be built to accessible and adaptable standards, whilst at least 5% of all new market homes, and at least 10% of all affordable homes, are to be built as 'wheelchair accessible' dwellings (according to Building Regulations).

9.50 **Policy PLP19** (Housing for Specific Groups) outlines that development proposals will be supported for specialist housing where this is an identified need. This includes community-led development such as self-build or custom-build homes; specialist and supported housing; purpose-built student accommodation; Build to Rent homes; communal or co-living homes; and

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service personnel and service family accommodation. Policy PLP19 sets out specific requirements for self-build or custom-build homes, purpose-built student accommodation, Build to Rent homes, and communal or co-living homes.

- 9.51 **Policy PLP20** (Houses in Multiple Occupation) outlines that development proposals for new HMOs, and changes of use to existing HMOs, will only be permitted under specific circumstances, which are set out within the policy. Notably, a new HMO will only be permitted when less than 10% of residential properties within a 50-metre radius of the area surrounding the application property are in existing use as a HMO. This is to protect non-HMO residential properties and the amenity of nearby residents from the potential adverse impacts of HMOs.
- 9.52 **Policy PLP21** (Residential Density) states that residential development, including mixed-use schemes that have a residential element, should be high density (at least 120dph) in areas of high accessibility; medium density (at least 80dph) across the City's core residential areas; and lower density (at least 40dph) in the suburban edge. Meanwhile, **Policy PLP22** (Space Standards) is in place to ensure that development proposals meet the external and internal space needs of occupiers.
- 9.53 More broadly, **Policy PLP23** (Estate Renewal) supports development proposals within certain estates owned by the City Council, provided they meet the criteria set out within the policy. These estates are Paulsgrove, Portsea, Buckland, Landport, and Somertown and North Southsea. Development proposals for Gypsies, Travellers & Travelling Showpeople accommodation are addressed through **Policy PLP24** (Gypsies, Travellers & Travelling Showpeople).

Cumulative effects

- 9.54 The Local Plan states that the City's housing need cannot be met within the City's boundaries due to its constrained geography, which ultimately has a cumulative impact on the housing market in the wider area. As noted above, a contribution of 3,577 homes towards unmet housing need will be sought from neighbouring local authorities through the Duty to Cooperate. This is in addition to the 800 homes allocated to Portsmouth in the Fareham Local Plan, from 2023. This could add development pressures to communities outside of the Plan area, particularly in the development of greenfield land within the sub-region. However, it is recognised that the constraints to growth within the city itself have been highlighted through the joint PfSH work to date, and the local planning authorities across the partnership area are working together to plan for Portsmouth's unmet needs, including through continued exploration of Broad Areas of Search for Growth. The partnership working has the potential to support **significant cumulative positive effects** in the long-term, with strategic growth planned at the wider sub-regional scale. Furthermore, most of the sites identified to meet the housing target within the city are brownfield, which cumulatively will positively affect sustainable development of the city.

Conclusions

- 9.55 Overall, **significant positive effects** are concluded in relation to this objective, recognising that the Plan puts forward a viable housing strategy at this stage,

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though this will require continued monitoring and partnership working to ensure longer-term housing needs can be planned for.

SA-6: Promoting healthy communities

Commentary on the spatial strategy

- 9.56 Portsmouth has more acute health inequalities and lower life expectancies than surrounding areas. There are also large inequalities between different parts of the city, for example males in areas of higher deprivation are dying 9.5 years earlier than those in the city's least deprived areas and there is a gap in life expectancy of 6.0 years for females. The Joint Strategic Needs Assessment (JSNA) and Public Health England Local Authority Profiles provide further snapshots of health and well-being in the city and have been used to identify priorities for health and well-being in the city which are reflected in the Portsmouth Health and Wellbeing Strategy 2018-2021.
- 9.57 The proposed spatial strategy focuses significant development at strategic development locations, many of which are located close to train stations and in areas of relatively good accessibility, particularly within the city centre. This will support objectives on healthy communities, encouraging sustainable transport use and short walking and cycling distances to key services and facilities, which will in turn encourage healthy lifestyles across communities. This is a key issue for the City Centre strategic site considering the AQMAs present.
- 9.58 The merits and constraints associated with the strategic sites allocated through the Local Plan, alongside how site-specific policy seeks to positively impact this objective and address constraints, are outlined below:
- **Tipner West & Horsea Island East** is located next to a large area of new open space to the north of the site on Horsea Island, which will be available for the new residents and visitors to enjoy (allocated under Policy PLP9). This will also benefit new residents at **Tipner East** if appropriate pedestrian and cycle access is delivered. There are plans for a new bridge linking not only the two halves of Tipner West & Horsea Island East, but the wider communities of Paulsgrove and Port Solent to the City Centre. The site will include meeting places for the principal use of the local community. Policy PLP3 (Tipner West & Horsea Island East) outlines that development proposals will be permitted provided that improved off-road pedestrian and cycle provision linking Port Solent and Tipner to the City Centre, nearby public open spaces, recreational facilities, and other local shops and services. This also applies for Tipner East under Policy PLP4.
 - **Portsmouth City Centre** will provide a new park at the City Centre North part of the site. Policy PLP6 (Portsmouth City Centre) outlines that development proposals will be permitted provided that they protect and enhance existing open spaces. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted provided that they integrate the following open spaces into new development to ensure public access is retained: The St James's Hospital Cricket Pitch, The Dog Park, land to the north west of the listed chapel and land to the east and west of Chapel Way.

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- **Fratton Park & the Pompey Centre** is located in walking distance to the services and facilities on offer in Fratton, including Fratton Railway Station. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development proposals will be permitted provided that a network of interconnecting green and public access corridors throughout the site will be delivered to enhance the level of green infrastructure.
- **St James' & Langstone Campus** contains playing fields which are used by both the University and several local sports clubs. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted if they retain, where possible, playing pitches and fields and public access to them. Policy PLP8 also outlines that development proposals will be permitted provided that they integrate the following open spaces into new development to ensure public access is retained: The St James's Hospital Cricket Pitch, the Dog Park, land to the north-west of the listed Chapel and land to the east and west of Chapel Way.
- **Horsea Island Open Space** is allocated for strategic public open space. Policy PLP9 (Horsea Island Open Space) outlines that that development proposals will be permitted provided that the new open space provision considers the needs and safety of the intended users and the need to provide accessible multi-functional spaces.

9.59 With regards to the site allocations, **Port Solent** benefits from being located adjacent to strategic site Horsea Island Open Space. Meanwhile, **Somers Orchard** and **Former St John's College Southsea** are located in proximity to the city centre, in walking distance of services and facilities here.

Commentary on city-wide policy provisions

- 9.60 Policy **PLP35** (Air Quality and Pollution) states that planning permission will be granted where development proposals demonstrate how health inequalities and the wider determinants of health and wellbeing have been incorporated into the design, layout and the use of the development, and its impact on the mental and physical health and wellbeing of occupiers. In addition, major development proposals will be required to undertake an accompanying Health Impact Assessment, demonstrating how the planning application has been informed by the findings of the assessment in regard to air quality.
- 9.61 Policy **PLP45** (Open Space) supports development proposals where they seek to create, protect and/or enhance open space, and if practicable, improve accessibility to open space. Enhancements of existing open spaces should seek to maximise their quality, multifunctionality and accessibility. Development proposals that would result in the net loss of open space will only be allowed in special circumstances, which are set out within the policy. Development proposals for more than 50 new homes will be permitted where they provide an area of open space to the ratio of 1.65ha per 1,000 people.
- 9.62 In addition to the above, Local Green Spaces (LGSs) are designated and protected through **Policy PLP46** (Open Green Spaces).

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Cumulative effects

- 9.63 Cumulative effects are also anticipated in relation to improvements to accessibility, resulting from the in-combination effects of enhancements to public transport and cross-boundary walking and cycling networks.
- 9.64 The draft Plan seeks to protect and enhance the strategic network of biodiversity, open space, and green infrastructure, extending throughout the city and the wider region. The provision of natural and semi-natural green space through draft Plan proposals and projects (i.e., Green Corridors in Corsham, the Northern Road 'green corridor', green infrastructure provision at Pompey Centre, and regeneration in the city centre) will therefore deliver benefits at a sub-regional and local level, promoting access to greenspaces, and benefitting deprived communities.
- 9.65 Development proposed through the Plan could affect the implementation of Portsmouth's Local Air Quality Action Plan, AQMAs and the Clean Air Zone, as well as the potential for cumulative impacts. The Plan seeks to maximise opportunities to improve air quality and mitigate impacts through the delivery of strategic sites, supporting improved traffic and travel management, and infrastructure provision and enhancement.

Conclusions

- 9.66 On balance, it is appropriate to conclude that the draft Plan could lead to **significant long-term positive effects** in terms of promoting healthy communities within the city boundaries. Policies are coordinated to deliver positive health outcomes within the city, providing new homes, employment and community and transport infrastructure which prioritise healthy lifestyles, increase safety and reduce deprivation.

SA-7: Conserving and enhancing the historic townscape

Commentary on the spatial strategy

- 9.67 The city's numerous heritage assets are valued for their architectural, aesthetic, historic, communal, and evidential contribution to the City. Notably, Portsmouth is one of the UK's principal naval dockyards and is of national and international significance. The historic buildings and townscape reflect the City's built heritage through the extensive network of military defences and in the barracks and other spaces / sites associated with the navy's long historic presence. Its heritage makes a vital contribution to its distinctiveness, sense of place and quality of life for its residents.
- 9.68 The heritage constraints associated with the strategic sites allocated through the Local Plan, alongside how site-specific policy seeks to positively impact this objective and address these constraints, are outlined below:
- **Tipner West & Horsea Island East** contains four grade II listed buildings, which form a rare and unusual group of historic early ordnance magazines. In addition, a scheduled monument 'Horsea Island D-Day Landing Craft Maintenance Site' immediately abuts the Horsea Island East site. Policy PLP3 (Tipner West & Horsea Island East) outlines that the listed buildings

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and scheduled monument must be retained, restored and re-used, the latter where this is desirable/ possible. Their fabric and setting must be conserved and should be enhanced. This will include the investigation, recording and safeguarding of known and potential finds of archaeological significance. Policy PLP3 also outlines that development proposals will be permitted provided that they allow views to and from Tipner West and notable landmarks within the zone of visibility including Portchester Castle, the Spinnaker Tower and His Majesty's Naval Base.

- **Tipner East** does not contain any designated heritage assets; the nearest are the four grade II listed buildings within Tipner West & Horsea Island, approximately 220m northwest of the site on the other side of the M275 motorway.
- **Lakeside North Harbour** does not contain any designated heritage assets; the nearest is a grade II listed building approximately 80m east of the site. There is also a scheduled monument approximately 260m south of the site. The site is also in proximity to Old Wymering Conservation Area, which is located to the north of the site on the other side of the A27.
- **Portsmouth City Centre** contains 27 listed buildings, including three grade II* listed buildings. It also contains grade II listed park and garden 'Victoria Park' and overlaps with the Guildhall and Victoria Park and Mile End Conservation Areas. Policy PLP6 (Portsmouth City Centre) outlines that development within the Guildhall Cultural Regeneration Area should protect and enhance the setting of heritage assets and the Guildhall and Victoria Park Conservation Area.
- **Fratton Park & the Pompey Centre** does not contain any designated heritage assets; the nearest is a grade II listed building approximately 100m northeast of the site. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development proposals will be permitted provided that the design, height and density of development integrates with and complements the existing context and character of the site.
- **St James' & Langstone Campus** contains two grade II listed buildings. It is also in proximity to Milton Locks Conservation Area to the southeast. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted provided that they retain and conserve the significance and setting of these listed buildings and all other historic assets in the hospital grounds (St James). In addition, all proposed development must be accompanied by a heritage assessment (St James).
- **Horsea Island Open Space** does not contain any designated heritage assets; the nearest is a scheduled monument approximately 130m south of the site. Policy PLP9 (Horsea Island Open Space) outlines that development proposals will be permitted provided that they allow views to and from the open space and notable landmarks within the zone of visibility including Portchester Castle, the Spinnaker Tower and His Majesty's Naval Base.

9.69 In terms of allocation sites, whilst site-specific policies play a role, it is considered that the city-wide draft Plan policies (explored under the next heading) will set the requirements for development, which are intrinsically

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linked to ensuring that these sites avoid, and where necessary, mitigate and manage the potential negative effects that may arise.

Commentary on city-wide policy provisions

- 9.70 The draft Plan proposes a number of policies that support and guide development to minimise the impact of the spatial strategy on the historic environment, and maximise opportunities for enhancements, particularly in terms of accessibility.
- 9.71 **Policy PLP53** (Historic Environment) outlines that development proposals will only be permitted where they conserve or enhance the City's heritage assets in a manner appropriate to their significance. Development proposals which affect heritage assets, or their setting, will be determined with regard to the significance of the asset. Where a development proposal would impact on the fabric or setting of a designated or non-designated heritage asset, the applicant will be required to provide a supporting Heritage Statement. Development proposals that would improve the condition of heritage assets that are considered to be 'at risk' through neglect, decay or other threats will be encouraged and supported.
- 9.72 **Policy PLP54** (Listed Buildings) states that development proposals which affect a listed building or its setting will only be permitted where: a) they preserve or enhance the significance of the listed building and its setting by demonstrating that loss of historic fabric and detail of significance is avoided; and b) harm to the significance of the listed building or its setting is considered to be outweighed by public benefits by the Council. Development proposals will be refused planning permission and/or listed building consent where they cause substantial harm to a listed building or its setting.
- 9.73 **Policy PLP55** (Conservation Areas) only permits development proposals within a conservation area, or within its setting, where they preserve or enhance the character or appearance of the conservation area.
- 9.74 **Policy PLP56** (Archaeology) seeks to protect archaeological assets and their setting from harm as a result of development. Sufficient information in a Heritage Statement is required to allow an informed assessment of the significance of the archaeological heritage asset and its setting, and the impact of the proposed development on that significance. There will be a presumption in favour of preservation in-situ for scheduled monuments and other archaeological heritage assets of equivalent significance.

Cumulative effects

- 9.75 The city's economy is boosted by its tourism and cultural offer, stemming largely from its Naval Heritage and coastal environment. The city attracts visitors from around the world, and therefore regeneration proposed through the spatial strategy is likely to support the sub-regional marine and maritime sector. **Minor positive cumulative effects** are considered likely in this respect.
- 9.76 Additional homes may also need to be sought beyond the constrained city boundaries (through the 'Duty to Cooperate') within neighbouring authority areas, adding development pressures to land within the sub-region, which may cumulatively affect the wider historic environment setting.

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Conclusions

- 9.77 Overall, the draft Plan policies seek to ensure that development retains and enhances the significance of the historic environment and heritage assets and their settings (including designated and non-designated sites). Encouraging the retention of historic heritage buildings and their reuse is anticipated to lead to **minor positive effects**, contributing towards meeting objectives not only within heritage protection and accessibility, but also in the related area of urban design and achieving a strong competitive economy.
- 9.78 Protection is also provided to ensure that development appropriately considers archaeology as a prominent historic asset within the city. The policies are likely to reduce the extent of the negative effects identified; however, the overall impact remains **uncertain** at this stage as it is ultimately dependent on-site level schemes demonstrating successful design, layout and integration.

SA-8: Requiring good urban design in Portsmouth

Commentary on the spatial strategy

- 9.79 The spatial strategy provides direct links to elements of good design, including by focussing significant new growth requirements in key locations that are, or can be made sustainable, with high levels of accessibility which in turn will limit the need to travel. Sites within the City Centre and Fratton offer a choice of transport modes, with good bus and rail links, and are therefore considered overall as highly accessible locations, with strategic growth likely to encourage walking and cycling and a modal shift.
- 9.80 Furthermore, delivering growth at scale through strategic sites is considered likely to unlock higher and bespoke standards of design that provide high quality place making. The spatial strategy seeks to deliver strategic development / regeneration throughout the city that reflects and enhances each area's defining characteristics, while also achieving high design quality and shaping the future of the city.
- 9.81 The strategic sites allocated through the draft Plan address good urban design through their site-specific policies, as outlined below:
- Policies PLP3 (**Tipner West & Horsea Island East**) and PLP4 (**Tipner East**) for the separate sites outline that development proposals will be permitted provided that they create a new landmark gateway to the City of Portsmouth to be demonstrated through a conceptual site-wide masterplan with an accompanying design code framework that delivers beautiful place-making and has regard to the National Model Design Code.
 - Policy PLP5 (**Lakeside North Harbour**) outlines that development proposals will be permitted provided that:
 - A masterplan and design code for the whole site is prepared, submitted and approved as part of a site-wide planning application, to ensure that all future development at Lakeside is brought forward in a holistic manner; and

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- A high standard and quality of design is achieved which is sympathetic to the existing high quality, campus-style setting of the business park and the areas and networks of recognised ecological value.
- Policy PLP6 (**Portsmouth City Centre**) outlines that development proposals will be permitted provided that they demonstrate how its design enhances the City Centre's appearance and considers the needs of its users through the provision of a design code.
- Policy PLP7 (**Fratton Park & the Pompey Centre**) outlines that development proposals will be permitted provided that the design, height and density of development should integrate with and complement the existing context and character of the site and be developed in accordance with other policies within the draft Plan.
- Policy PLP8 (**St James' & Langstone Campus**) outlines that development proposals will be permitted provided that the design and layout conserves or enhances and appropriately integrates into the locally distinct parkland landscape setting and open character of the site.
- Policy PLP9 (**Horsea Island Open Space**) outlines that development proposals will be permitted provided that they take account of the approved plan for landscaping and maintenance of the former landfill site which impacts the eastern portion of the site.

9.82 In terms of non-strategic sites, it is considered that the wider draft Plan policies (explored under the next heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites manage the potential negative effects arising.

Commentary on city-wide policy provisions

9.83 Design is considered through the Plan, playing a key role in the delivery of policies across all ten objectives.

9.84 The focus of design is **Policy PLP1** (Design), which is in place to ensure that a high standard and quality of design and place-making that support beauty is achieved in the city. It sets out criteria which development proposals will be assessed against. This includes, but is not limited to, understanding and relating positively to local context, character and identify, and creating appropriate forms and types of development.

9.85 **Policy PLP49** (Public Realm) outlines that development proposals will be permitted where opportunities to enhance the public realm have been designed into the application. This is to ensure, amongst other things, that aspects of the public realm incorporate design of the highest quality, including landscaping, green and blue infrastructure, lighting, acoustics, street furniture, and surfaces.

9.86 With a focus on housing, **Policy PLP19** (Housing for Specific Groups) outlines that development proposals involving more than one self-build or custom-build on a site must be supported by a design framework that is submitted as part of the planning application. In addition, **Policy PLP23** (Estate Renewal) supports development proposals within the Council's estates provided that they deliver high quality design and sustainability, considering any relevant design guidelines or codes. Finally, **Policy PLP24** (Gypsies, Travellers & Travelling

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Showpeople) states that good design and landscaping should ensure that sites have adequate residential amenity and privacy for intended occupiers.

- 9.87 Regarding the historic environment, **Policy PLP55** (Conservation Areas) states that development in a conservation area will be permitted where a consistently high standard of design has been applied and good quality materials, especially those that are locally sourced and/or distinctive are proposed to be used.
- 9.88 **Policy PLP35** (Air Quality and Pollution) outlines that planning permission will be granted where development proposals demonstrate how health inequalities and the wider determinants of health and wellbeing have been incorporated into the design, layout and the use of the development, and its impact on the mental and physical health and wellbeing of occupiers.
- 9.89 **Policy PLP47** (Movement and Transport) states that the design and site layout of new development must protect the safety and amenity of all and give priority to the needs of pedestrians, cyclists, users of mobility aids and other non-motorised forms of transport. Movement through the site must be a safe, legible and attractive experience for all users, with roads and surfaces that contribute to the experience rather than dominate it. Design is also considered through **Policy PLP48** (Access and Parking).
- 9.90 **Policy PLP33** (Sustainable Construction and Onsite Renewable Energy) states that proposals will need to demonstrate consideration of all aspects of sustainable design and construction for the lifecycle of the development. Planning permission will be granted where proposals have certified against an independent assessment framework (or equivalent replacement scheme), or an alternative scheme.
- 9.91 More broadly, **Policy PLP2** (Climate Emergency) states that development proposals will be supported provide that they are designed to adapt and be resilient to the impacts of local climate change. In addition, **Policy PLP32** (Sustainable Drainage Systems) only permits development proposals where SuDS are sensitively located and designed to promote an enhanced landscape / townscape and good quality spaces that improve public amenity.
- 9.92 Also of relevance to this objective, **Policy PLP30** (Cultural and Visitor Economy) states that proposed development must be of an appropriate type, scale and design to complement and support the role of the existing centre or area and enhance its character.

Cumulative effects

- 9.93 The draft Plan recognises that high-quality design and masterplanning can support local, regional, and national climate change objectives. Good urban design can improve the sustainability performance of development (i.e. in terms of energy efficiency) while also improving accessibility to reduce the need to travel. On this basis, **minor positive cumulative effects** are considered likely.

Conclusions

- 9.94 The Plan seeks to secure good urban design through strategic regeneration of key city locations, delivering enhancements to public realm, accessibility and the environmental quality of the area. Policy requirements seek to ensure development will support connectivity of active travel, green infrastructure and

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provide net gains in biodiversity, to deliver high quality urban living, working, and visiting environments. Whilst there remains an element of uncertainty in relation to potential growth outside of the city boundaries, within the city confines **minor long-term positive effects** are considered likely overall.

SA-9: Conserving and enhancing the natural environment in Portsmouth

Commentary on the spatial strategy

9.95 Portsmouth, despite its dense urban environment, benefits from a rich diversity of flora and fauna in its coastal, harbour and chalk grassland environments. It is the UK's only 'island city' and some 30% is covered by statutory nature conservation designations in recognition of its value to international, national and local biodiversity. The intertidal areas around Portsmouth, particularly the mudflats, shingle and saltmarsh provide ideal feeding and roosting grounds for overwintering bird species that are especially adapted to feeding in such habitats. The impacts of new development and construction can cumulatively disturb and pollute these environments, potentially affecting the health and key species and the quality of the water environment in the Solent.

9.96 The wider Solent area is generally regarded as a region of significant ecological value and sensitivity. Given the urban nature of southern Hampshire, an extensive evidence base relating to potential impact pathways has been developed. Furthermore, there are well-established issues (e.g. recreational disturbance and functionally linked habitat loss) for which strategic mitigation measures have already been developed.

9.97 The constraints associated with the strategic sites allocated through the draft Plan, alongside how site-specific policy seeks to positively impact the natural environment and address constraints, are outlined below:

- **Tipner West & Horsea Island East** partially overlaps Portsmouth Harbour SPA, Ramsar site and SSSI. It also contains BAP priority habitats deciduous woodland, lowland calcareous grassland, coastal and floodplain grazing marsh, and mudflats. Regarding the National Habitat Network, the site contains lowland calcareous grassland and almost entirely overlaps Network Enhancement Zone 2. Regarding priority species for Countryside Stewardship (CS) targeting, the site overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. The former firing range on the site is recognised as a primary support area (P60) for Brent geese. The delivery of sea defences together with site decontamination works at the site will protect the integrity of the nearby nature conservation sites and associated habitats from harmful leachate contamination and inundation from flooding. Policy PLP3 (Tipner West & Horsea Island East) outlines that development proposals will be permitted provided that they:
 - Identify and incorporate opportunities to conserve, restore and recreate priority habitats and ecological networks.
 - Avoid the loss of SPA/ Ramsar habitats including by way of land reclamation. If that is not viable or feasible, minimise such loss to that required to enable the viable and feasible development of the site in

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- line with the City Deal whilst protecting the integrity of the international, national and local nature designations.
- Mitigate likely significant effects from recreational disturbance to protected bird populations through a bespoke developer-provided package of measures for the lifetime of the development as advised by Natural England; and
 - Provide for public access along the waterfront where feasible and without causing unmitigated recreational disturbance to protected bird populations.
- **Tipner East** is adjacent to Portsmouth Harbour SPA, Ramsar site and SSSI. It also contains BAP priority habitat mudflats and almost entirely overlaps Network Enhancement Zone 2 of the National Habitat Network. Regarding priority species for Countryside Stewardship targeting, the site overlaps priority areas for Countryside Stewardship measures addressing Lapwing and Redshank habitat issues. Part of the site is identified as a secondary support area (P139) for Brent geese. Policy PLP4 (Tipner East) outlines that development proposals will be permitted provided that they:
 - Provide for public access along the waterfront where feasible and without causing unmitigated recreational disturbance to protected bird populations; and
 - Provide appropriate compensation and mitigation measures to the satisfaction of the local planning authority and Natural England in regard to the Secondary Support Sites P136 and P139 of the Solent Waders and Brent Goose Strategy.
 - **Lakeside North Harbour** is approximately 130m north of Portsmouth Harbour SPA, Ramsar site and SSSI, located on the other side of the M27. It also contains BAP priority habitat deciduous woodland and partially overlaps Network Enhancement Zone 2 and Network Expansion Zone of the National Habitat Network. Regarding priority species for CS targeting, the site overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. Part of the site is designated as a SINC and is partially within Candidate Site P138 of the Solent Waders and Brent Goose Strategy. Over 200 of the trees within the site are covered by individual Tree Preservation Orders (TPOs). Policy PLP5 (Lakeside North Harbour) outlines that development proposals will be permitted provided that:
 - Surveys are carried out to determine the classification of Candidate Site P138 of the Solent Waders and Brent Goose Strategy. Appropriate avoidance and mitigation measures to be provided to the satisfaction of the local planning authority and Natural England.
 - BNG of at least 20% is demonstrated as deliverable through the development and secured in perpetuity (at least 30 years) on site.
 - An Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan is submitted and implemented that protects trees throughout the site.
 - **Portsmouth City Centre** is approximately 1.1km south of Portsmouth Harbour SPA, Ramsar site and SSSI. It contains BAP priority habitat deciduous woodland (Victoria Park). Regarding priority species for CS

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targeting, the site almost entirely overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. Policy PLP6 (Portsmouth City Centre) outlines that development proposals will be permitted provided that they:

- Protect trees within the City Centre and take opportunities to plant more and provide enhanced greening.
 - BNG of at least 20% is demonstrated as deliverable through the development and secured in perpetuity (at least 30 years) at City Centre North.
- **Fratton Park & the Pompey Centre** is approximately 1.5km west of Solent Maritime SAC, Chichester and Langstone Harbours SPA and Ramsar site, and Langstone Harbour SSSI. Regarding priority species for CS targeting, the site almost entirely overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development proposals will be permitted provided that a network of interconnecting green and public access corridors throughout the site will be delivered to enhance the level of green infrastructure and encourage net gains in biodiversity.
 - **St James' & Langstone Campus** is adjacent to Chichester and Langstone Harbours SPA and Ramsar site, Solent Maritime SAC, and Langstone Harbour SSSI. It contains BAP priority habitat deciduous woodland and partially overlaps Network Enhancement Zones 1 and 2 and Restorable Habitat. Regarding priority species for CS targeting, the site almost entirely overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. The hospital grounds (St James) contain a large number of mature trees, including TPOs. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted provided that an Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan is submitted and implemented that protects trees throughout the site (St James). In addition, Policy PLP8 outlines that development proposals must provide appropriate mitigation for any direct recreational disturbance upon the adjacent Langstone and Chichester Harbour SPA, Solent Maritime SAC and any other nationally or locally designated habitat sites including supporting habitats.
 - **Horsea Island Open Space** is adjacent to Portsmouth Harbour SPA, Ramsar site and SSSI. Regarding priority species for CS targeting, the site almost entirely overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. Policy PLP9 (Horsea Island Open Space) outlines that that development proposals will be permitted provided that the open space provides for a mosaic of habitat that links to and supports the habitat of the neighbouring Portsmouth Harbour SPA and recognises the role of the site as core and primary supporting habitat for waders and Brent Geese. It contains BAP priority habitats deciduous woodland and lowland calcareous grassland and partially overlaps Network Enhancement Zone 2.

9.98 The Local Plan is supported by a Habitats Regulations Assessment (HRA). This concludes that no elements of the Portsmouth Local Plan will have an adverse effect on the integrity of any Habitats sites, either alone or in

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combination with other plans or projects, except for the redevelopment of Tipner peninsula as set out in **Policy PLP3: Tipner West & Horsea Island East**. Accordingly, that policy can only be adopted lawfully if it meets the statutory derogations tests. The HRA therefore examines whether alternative solutions exist, including alternative solutions to the flood prevention and sea defence elements of the allocation, alternative solutions to the site decontamination elements of the allocation, alternative solutions to the marine employment hub element of the allocation, alternative solutions to the bridge element of the allocation, and alternative solutions to the housing element of the allocation. The HRA also considers whether there are IROPI and whether there is sufficient suitable land available to provide compensatory measures for the direct loss of habitat predicted. The overall conclusion is that the derogations tests are met and that *“sufficient information exists at the Local Plan level to be able to conclude that the Tipner West and Horsea Island East (Policy PLP3) that a) there are no feasible alternatives to this allocation while still meeting the objectives of the Local Plan and Portsmouth City Deal, b) that there are IROPI as to why the Local Plan should be adopted with Policy PLP3 intact despite the harm caused to Portsmouth Harbour SPA/ Ramsar site, and c) there is sufficient land identified for delivery of compensatory measures that there is a high likelihood sufficient compensatory provision could be secured at the planning application level.”*

- 9.99 In terms of non-strategic sites, whilst the site-specific policies play a role, it is considered that the wider draft Plan policies (explored under the next heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites manage the potential negative effects arising.

Commentary on city-wide policy provisions

- 9.100 **Policy PLP36** (Coastal Zone) outlines that development proposals in the Coastal Zone will be permitted where they, amongst other considerations, seek opportunities to maintain and enhance access to the coast whilst minimising recreational disturbance to bird populations.
- 9.101 **Policy PLP38** (Green Infrastructure) outlines that major development will be permitted where it provides or contributes to green infrastructure, in line with the five key standards as set out in the Natural England Green Infrastructure Framework. The policy identifies a Green Grid and Green Corridors, which development should seek to conserve and enhance.
- 9.102 **Policy PLP39** (Biodiversity) outlines that development proposals will be permitted where they conserve and enhance biodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation. Up-to-date ecological information should be submitted which demonstrates that development proposals, amongst other considerations, retain, protect and enhance features of biodiversity interest and protect and support recovery of rare, notable and priority species. Policy PLP39 sets out a hierarchy of site designation, which will apply in the consideration of development proposals. Internationally protected SPAs, SACs and Ramsar sites are at the top of this hierarchy, followed by nationally protected SSSIs and NNRs; irreplaceable habitats (veteran and ancient trees); and finally locally protected LWSs, SINC, SNCIs and LNRs.

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- 9.103 Under **Policy PLP40** (Biodiversity Net Gain), development proposals will be permitted where they demonstrate at least a 10% net gain in biodiversity, accounted for in a biodiversity net gain plan. The policy highlights that development proposals should prioritise on-site BNG. In addition, development proposals within the strategic sites of Portsmouth City Centre and Lakeside, and the allocation site of Somers Orchard, which are all owned by the City Council, will need to demonstrate a 20% net gain in biodiversity accounted for in a biodiversity net gain plan.
- 9.104 **Policy PLP41** (Trees & Hedgerows) seeks to protect trees and hedgerows by ensuring that development proposals seek to retain on-site trees and hedgerows where possible, particularly those with TPOs. It also supports an increase in tree canopy cover in line with the Natural England Green Infrastructure Urban Tree Canopy Cover Standard. Specifically, tree canopy cover of at least 15% will need to be provided on new major development and lost trees should be replaced at a ratio of 1:1. Development proposals that would result in the loss or deterioration of ancient or veteran trees will only be allowed in exceptional circumstances.
- 9.105 **Policy PLP42** (Solent Waders and Brent Geese Sites) seeks to protect functionally linked sites, which are used by Solent Waders and/or Brent Geese, from adverse impacts commensurate to their status in the hierarchy of the Solent Wader and Brent Geese Network as outlined in the Solent Waders and Brent Goose Strategy. Proposals that impact these sites will need to provide mitigation as set out within the Solent Waders and Brent Goose Strategy.
- 9.106 **Policy PLP43** (Recreational Disturbance on International Nature Designations) states that planning permission for proposals resulting in a net increase in residential units will be permitted where a financial contribution is made towards the Solent Recreation Mitigation Strategy. In the absence of this, proposals will need to avoid or mitigate any in combination negative effects from recreation through a developer-provided package of measures for the lifetime of the development. Policy PLP43 also outlines that development should avoid noise disturbance impacts on birds at the SPA sites and/or at identified terrestrial SPA supporting habitat sites though the overwintering period.
- 9.107 Nutrient neutrality is addressed through **Policy PLP44** (Nutrient Neutrality in International Nature Designations). This policy permits development proposals where they demonstrate, through a nutrient budget, that they secure nutrient neutrality through either offsetting, provision of direct and indirect mitigation measures, purchase of mitigation credits, or a mixture of these.
- 9.108 More broadly, **Policy PLP51** (Electronic Communications and/or Utilities Infrastructure) seeks to ensure that development proposals for new electronic communications and/or utilities infrastructure minimises environmental impacts.

Cumulative effects

- 9.109 The HRA cannot exclude adverse effects on internationally and nationally protected habitats whilst the plan includes Policy PLP3 for the allocation site Tipner West and Horsea Island East. This will have cumulative effects for designated sites subject to wider growth pressures across the Solent and effects are likely to be both positive and negative. If the allocation is developed

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as proposed, benefits are likely to emerge in relation to water quality and meeting WFD targets, as well as indirectly through increased resilience to climate change and flood risk across the sub-region in combination with other plans.

Conclusions

9.110 In line with the findings of the HRA, at this stage the potential for **significant negative effects** in relation to this SA objective are identified, and it will be down to sufficient delivery of compensatory measures to reduce the extent of these effects. The benefits of the allocation and IROPI will ultimately be weighed by plan-makers against these likely impacts.

SA-10: Facilitating the sustainable use of natural resources in Portsmouth

Commentary on the spatial strategy

9.111 In terms of land resources, the Plan recognises the role of the Hampshire Minerals and Waste Plan in enabling the delivery of sustainable minerals and waste development. Whilst the city contains safeguarded reserves of Brick Clay, Superficial Sand and Gravel and Soft Sand, these are largely limited to important reserves beneath areas of open space. The open space network is largely protected through the proposed spatial strategy and wider policies as discussed under the next heading.

9.112 The constraints associated with five of the seven strategic sites allocated through the draft Plan, alongside how site-specific policy seeks to address constraints, are outlined below:

- **Tipner West & Horsea Island East** is currently partly derelict and contains a number of unrelated land uses including a former Ministry of Defence firing range, boatyards, recycling, storage, and a special educational needs school. The site needs significant remediation to address historic polluting uses. Its redevelopment, as recognised in the City Deal, presents an opportunity to vastly improve the quality of the environment in this part of the city.
- **Tipner East** has a long history of polluting land uses dating back to the 1860s. At the time of writing (2024) the remediation works were underway in line with the Construction Environmental Management Plan approved for planning application (10/00849/OUT).
- Policies PLP3 (Tipner West & Horsea Island East) and PLP4 (Tipner East) outline that development proposals for the separate sites will be permitted provided that they:
 - Deliver appropriate surface water and foul drainage infrastructure together with required nutrient neutrality and water usage mitigation measures to support the Environment Agency in achieving and/or maintaining at least 'good' water quality status and to protect designated habitats within the Portsmouth Harbour Waterbody; and
 - Mitigate and remediate contamination from current and historic uses.

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- **Lakeside North Harbour** was built on reclaimed land from the northern section of Portsmouth Harbour. Policy PLP5 (Lakeside North Harbour) outlines that development proposals will be permitted provided that evidence is provided of the current and historical contamination of the site and provision made for any necessary remediation to the satisfaction of the local planning authority.
- Policy PLP6 (**Portsmouth City Centre**) outlines that development proposals will be permitted provided that evidence is provided of the current and historical contamination of the site and provision made for any necessary remediation to the satisfaction of the local planning authority.
- **Horsea Island Open Space** is allocated for strategic public open space. Policy PLP9 (Horsea Island Open Space) outlines that that development proposals will be permitted provided that they take account of the approved plan for landscaping and maintenance of the former landfill site which impacts the eastern part of the site.

9.113 In terms of non-strategic sites, whilst the site-specific policies play a role, it is considered that the city-wide draft Plan policies (explored under the next heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites manage the potential negative effects arising.

Commentary on city-wide policy provisions

9.114 **Policy PLP1** (Design) requires that large-scale major developments should be supported by detailed masterplans or development frameworks and, where appropriate, design codes. Design considerations include the use of materials and their quality, sustainability, and durability, as well as materials in hard and soft landscaping and high-quality public and private spaces. Supported by **Policy PLP33** (Sustainable Construction and Onsite Renewable Energy) which requires that relevant proposals must demonstrate using a Sustainability Statement that all resources are used efficiently, as part of the construction and operation of a building, including consideration of embodied emissions.

9.115 **Policy PLP45** (Open Space) seeks to protect and enhance the open space network as well as accessibility to open space. The policy restricts the loss of existing space, whilst requiring new open space in significant development proposals. Development will be expected to create net gains in biodiversity through the requirements of **Policy PLP40** (Biodiversity Net Gain), and **Policy PLP38** (Green Infrastructure) outlines that major development will be permitted where it provides or contributes to green infrastructure, in line with the five key standards as set out in the Natural England Green Infrastructure Framework. Not only do the policies seek to retain and enhance the existing green infrastructure network, but in doing so also provide indirect support for the retention of the city's mineral resources.

9.116 The extension of appropriately located high-density areas (**Policy PLP21** (Residential Density)) will make more efficient and effective use of land, increasing accessibility in the urban centres. What is 'appropriate' will be determined in part by urban design principles that combine layout, form and scale in a way that responds positively to its context.

9.117 **Policy PLP37** (Contaminated Land) outlines that planning permission will only be granted for development on or near contaminated land, or where the

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presence of contamination is reasonably suspected, where appropriate and sufficient measures can be taken to remediate and/or satisfactorily mitigate the risk of contamination. Such measures must address the long-term safety of the proposed development, the end users of that development, and the natural environment and include the future management of the site.

Cumulative effects

- 9.118 Development within the city has the potential to cumulatively impact upon the wider water resource management zone, though joint working with Portsmouth Water and Southern Water is likely to ensure that water resource needs can be met throughout the plan period in line with the objectives and actions outlined through the Water Resource Management Plans.
- 9.119 With a focus on regeneration opportunities, and the premise for biodiversity net gain enhancing a strategic green infrastructure network that extends the city, **minor positive cumulative effects** are anticipated overall.

Conclusions

- 9.120 The spatial strategy prioritises significant regeneration opportunities alongside the retention of key natural resources that support the ecosystems and green infrastructure network of the city. The spatial strategy and policy provisions ensure long-term protection for existing open spaces, indirectly protecting the city's mineral resources. The additional policy support for high levels of efficiency in design and construction ensure long-term resource efficiency. As a result, **minor long-term positive effects** are concluded as likely.

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10. Conclusions and recommendations

10.1 Overall, the following conclusions are reached for each of the SA objectives:

SA objective	Plan appraisal conclusion
SA-1: Building a strong, competitive economy in Portsmouth	The spatial strategy and policy provisions of the draft Plan are considered for their potential to support the strategic objectives of the Plan to enable a strong and diverse economy that raises the quality of life and access to education and training opportunities for all. Overall significant positive effects are considered likely as a result.
SA-2: Ensuring the vitality of the City Centre and other town centres in Portsmouth	The detailed guidance and support provided for Portsmouth's centres, including growth at key locations, are considered to provide significant support for long-term vitality. As a result, significant positive effects are anticipated overall.
SA-3: Promoting sustainable transport in Portsmouth	Overall, the Plan seeks to deliver new infrastructure improvements and prioritises sustainable transport access, particularly active travel, in direct support of the strategy objectives for a healthy and happy city, a green city and a city with easy travel. The Plan also requires development to mitigate its impact on the strategic and local road network. As a relatively compact and accessible city, long-term minor positive effects are considered likely overall.
SA-4: To tackle climate change, flooding, and coastal change in Portsmouth	The strategic growth locations can support a good mix of uses within the city and lead to economies of scale to the benefit of climate resilience. Particularly by enabling the delivery of new or upgraded transport infrastructure, low carbon heat and power, flood resilience measures, and community infrastructure and open spaces, and positive effects are anticipated in this respect. Flood risk is a key constraint to growth in the city, and flood resilience in line with the proposed policy provisions will be key to ensuring that long-term adverse effects are avoided. However, as the plan strategy includes housing within high flood risk zones, minor negative effects are concluded.
SA-5: Delivering high-quality homes in Portsmouth	Overall, significant positive effects are concluded in relation to this objective, recognising that the Plan has put forward a viable housing strategy at this stage, though this will require continued monitoring and partnership working to ensure longer-term housing needs can be planned for.

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SA objective**Plan appraisal conclusion**

SA-6: Promoting healthy communities

On balance, it is appropriate to conclude that the draft Plan could lead to **significant long-term positive effects** in terms of promoting healthy communities within the city boundaries. Policies are coordinated to deliver positive health outcomes within the city, providing new homes, employment and community and transport infrastructure which prioritise healthy lifestyles, increase safety and reduce deprivation.

SA-7: Conserving and enhancing the historic townscape

Overall, the draft Plan policies seek to ensure that development retains and enhances the significance of the historic environment and heritage assets and their settings (including designated and non-designated sites). Encouraging the retention of historic heritage buildings and their reuse is anticipated to lead to **minor positive effects**, contributing towards meeting objectives not only within heritage protection and accessibility, but also in the related area of urban design and achieving a strong competitive economy.

Protection is also provided to ensure that development appropriately considers archaeology as a prominent historic asset within the city. The policies are likely to reduce the extent of the negative effects identified; however, the overall impact remains **uncertain** at this stage as it is ultimately dependent on-site level schemes demonstrating successful design, layout, and integration.

SA-8: Requiring good urban design in Portsmouth

The Plan seeks to secure good urban design through strategic regeneration of key city locations, delivering enhancements to public realm, accessibility, and the environmental quality of the area. Policy requirements seek to ensure development will support connectivity of active travel, green infrastructure and provide net gains in biodiversity, to deliver high quality urban living, working, and visiting environments. Whilst there remains an element of uncertainty in relation to potential growth outside of the city boundaries, within the city confines **minor long-term positive effects** are considered likely overall.

SA-9: Conserving and enhancing the natural environment in Portsmouth

In line with the findings of the HRA, at this stage the potential for **significant negative effects** in relation to this SA objective are identified, and it will be down to sufficient delivery of compensatory measures to reduce the extent of these effects. The benefits of the allocation and IROPI will ultimately be weighted by plan-makers against these likely impacts.

SA-10: Facilitating the sustainable use of

The spatial strategy prioritises significant regeneration opportunities alongside the retention of key natural

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SA objective

Plan appraisal conclusion

natural resources in Portsmouth

resources that support the ecosystems and green infrastructure network of the city. The spatial strategy and policy provisions ensure long-term protection for existing open spaces, indirectly protecting the city's mineral resources. The additional policy support for high levels of efficiency in design and construction ensure long-term resource efficiency. As a result, **minor long-term positive effects** are concluded as likely.

10.2 A range of potential effects are identified overall and whilst potential significant effects are predominantly positive in nature, it is recognised that (in line with the findings of the HRA) significant negative effects are also considered likely in relation to the loss of functional habitat at internationally and nationally designated biodiversity sites. This will require compensatory measures and continued monitoring.

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Part 3: What happens next?

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11. Next steps

11.1 The aim of Part 3 is to explain the next steps in the plan-making/ SA process and identify potential monitoring measures.

Next steps

11.2 This SA Report will accompany the Local Plan for pre-submission (Regulation 19) public consultation. Any comments received will be reviewed and considered. The representations received along with any further evidence base work, including further SA work, will inform the submission version of the Local Plan, which the Council currently aims to submit for Independent Examination in 2024.

Monitoring

11.3 It is anticipated that monitoring will be undertaken as part of the Council's annual monitoring process, as reported through yearly Authority Monitoring Reports. Any additional monitoring requirements, if deemed necessary through the final plan-making stages, will be identified in the SA Adoption Statement (produced at the time of adoption of the plan).

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Appendices

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Appendix A – Regulatory requirements

As discussed in Chapter 1 of the main report, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. **Tables A, B & C** link the structure of this report to an interpretation of Schedule 2 requirements, and explains this interpretation.

Table A: Questions answered by the SA Report, in accordance with an interpretation of regulatory requirements

Report section	Questions answered	Regulatory requirement met
Introduction	What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes.
	What is the scope of the SA?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Key environmental problems/ issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
Part 1	What has plan-making/ SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach). The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in light of the alternatives assessment/ a description of how environmental objectives and considerations are reflected in the Plan.
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Plan. The measures envisaged to prevent, reduce, and offset any significant adverse effects of implementing the Plan.
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged.

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Table B: Questions answered by the SA Report, in accordance with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
1. an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
3. the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
6. the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
8. an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
9. a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

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Table C: 'Checklist' of how (throughout the SA process) and where regulatory requirements are or will be met.

Regulatory requirement	Discussion of how the requirement is met
Schedule 2 requirements:	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 2 ('What's the plan seeking to achieve') presents this information. The relationship with other plans and programmes is also set out in Appendix B (Scoping Information).
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2017. The outcome of scoping was an 'SA Framework', and this is presented within Chapter 3 ('What's the scope of the SA'). More detailed messages from the Scoping Report - i.e., messages established through context and baseline review - are presented within Appendix B. This also includes updates to scoping since the publication of the Scoping Report.
3. The environmental characteristics of areas likely to be significantly affected.	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
5. The environmental protection objectives established at international, national, or community level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	The Scoping Report (2017) presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined to establish an 'SA framework'. The scoping information is presented in Appendix B and includes any relevant updates. The context review informed the development of the SA framework and topics, presented in Chapter 3, which provide a methodological 'framework' for appraisal. With regards to explaining "how... considerations have been taken into account" - <ul style="list-style-type: none"> • Chapter 5 explains how reasonable alternatives were established in-light of available evidence. • Chapter 6 sets out the summary findings of the appraisal of policy options. • Chapter 6 sets out the detailed appraisal of city-wide spatial options for housing and employment growth. • Chapter 7 explains the Council's 'reasons for supporting the preferred approach', i.e., explains how/ why the preferred approach is justified in-light of alternatives appraisal (and other factors). • Chapter 9 sets out the findings of the appraisal of the draft plan and Chapter 10 provides a summary of the findings and any recommendations.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human	<ul style="list-style-type: none"> • Chapter 5 explains how reasonable alternatives were established in-light of available evidence.

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Regulatory requirement**Discussion of how the requirement is met**

health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between the above factors. (Footnote: these effects should include secondary, cumulative, synergistic, short-, medium-, and long-term, permanent and temporary, positive and negative effects).

- Chapter 6 sets out the summary findings of the appraisal of policy options.
- Chapter 6 sets out the detailed appraisal of city-wide spatial options for housing and employment growth.
- Chapter 9 sets out the findings of the appraisal of the draft plan and Chapter 10 provides a summary of the findings and any recommendations.

As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/ dimensions.

7. The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

Where necessary, mitigation measures are identified within the alternatives appraisal (in Chapter 6) and appraisal of the Draft Local Plan (Chapters 9 and 10).

8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

Chapter 5 deals with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues/ options. Also, Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.

9. A description of the measures envisaged concerning monitoring in accordance with Article 10.

It is anticipated that monitoring measures will be detailed in the SA Adoption Statement.

10. A Non-Technical Summary of the information provided under the above headings.

A Non-Technical Summary (NTS) is provided separately.

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations: Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying SA Report before the adoption of the plan or programme (Art. 6.1 and 6.2).

At the current time, this SA Report is being published alongside the Regulation 19 Local Plan for public consultation.

The SA Report must be taken into account, alongside consultation responses, when finalising the Plan. The SA Report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6, and the results of any transboundary consultations entered into pursuant to Article 7, shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

The Council will take into account this SA Report and consultation responses when preparing the Local Plan for submission.

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Appendix B – Scoping information

Scoping was undertaken in 2017, and a full baseline summary for each of the identified SA objectives is provided in the [Portsmouth City Council Sustainability Appraisal Scoping Report](#).

Since this Scoping Report was published, further updates have been provided in the [Portsmouth City Council Interim Sustainability Report](#), published in 2021. This report contained updates to national policy from 2017 to 2021, including those to the National Planning Policy Framework (NPPF) and the National Design Guide and National Model Design Code. It also includes a number of environmental policy updates, including the Environment Bill, the 25-Year Environment Plan, the UK (second) National Adaptation Programme, 'Build Back Better', the Clean Growth Strategy, updated transport strategies, and the Clean Air Strategy. Further, the release of the 'Build Back Fairer' The Covid-19 Marmot Review, Portsmouth Water's Final Water Resources Management Plan (WRMP) and Drought Plan 2019, and various updated evidence provided by Portsmouth City Council.

It is recognised that a number of **national policy changes and evidence updates** have been made since 2021, those of significance are reported below.

- [National Planning Policy Framework \(NPPF\)](#)
- The NPPF sets out the government's planning policies for England and how these are expected to be applied. There have been two updates recently to the NPPF, once in September, 2023 in which very little had changed from the previous update, with the main amendments to the policy coming under 'Meeting the challenge of climate change, flooding and coastal change'. This update to the NPPF assisted decision makers dealing with proposals to use and improve existing renewable energy sites giving weight to the advantages of doing so. It was then updated for a second time in December of 2023. The key changes introduced by the government through the updated Framework are:
 - Facilitating flexibility for local authorities in relation to local housing need.
 - Clarifying a local lock on any changes to Green Belt boundaries.
 - Safeguarding local plans from densities that would be wholly out of character.
 - Freeing local authorities with up-to-date local plans from annual updates to their five-year housing land supply.
 - Limiting the practice of housing need being exported to neighboring authorities without mutual agreement.
 - Bolstering protections from speculative development for neighborhoods that develop their own plans.
 - Supporting self-build, custom-build, and community-led housing.
 - Cementing the role of beauty and placemaking in the planning system.

The revisions confirm that strategic policies should optimize site densities and prioritize brownfield and other under-utilized urban sites. Annex 1 provides guidance on implementation stating that where emerging local plans reach pre-submission consultation after 19th March 2024, the policies in the current NPPF

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will apply, with all other plans continuing to be examined in the context of previous iterations of the Framework.

- [The UK Climate Change Risk Assessment 2022](#)

The UK Climate Change Risk Assessment 2022, published in January of 2022, is the third five-year assessment of the risks climate change poses to the UK, as required by the Climate Change Act (2008). It identifies 61 climate risks that will impact upon multiple areas of society, and identifies eight priority risk areas for action. These include (but are not limited to) risks to soil health, risks to human health, wellbeing and productivity, and risks to the viability and diversity of habitats and species.

- [The Net Zero Strategy: Build Back Greener](#)

Published in October 2021, sets out policies and proposals for decarbonizing all sectors of the UK economy in order to meet the Net Zero by 2050 target. It outlines four key principles that will contribute to this target: working with the grain of consumer choice, ensuring the biggest polluters pay the most, protecting the most vulnerable, and deliver deep cost reductions in low carbon technology.

- [Decarbonising Transport: A Better, Greener Britain](#)

This sets out the government's commitments to decarbonise the entire transport system in the UK, and actions needed to achieve this. This includes an outline of the pathway to net zero transport in the UK, the wider benefits net zero transport can deliver, and the principles that underpin the approach to delivering net zero transport. The [Decarbonising Transport: One Year On](#) (published July 2022) summarises what has been achieved to reduce emissions from transport, and the next steps the government will take to support further decarbonisation of the sector.

- [The Waste Management Plan for England](#)

Published in January 2021, is an analysis of the current waste management situation in the country, with the aim of bringing current waste management policies together under one national plan.

- [The Environment Act 2021](#)

This act seeks to halt the decline of species by 2030, clean up the air and protect the health of rivers in the UK, as well as reform the way in which waste is dealt with and resources are used. It also seeks to tackle deforestation overseas, and will require new development to improve or create habitats as part of the design.

- [The National Infrastructure Strategy](#)

Published in November 2020, sets out the government's plans to deliver an improvement to the UK's infrastructure to help level up the country and support the journey to net zero emissions by 2050.

- [Health Equity in England: The Marmot Review 10 Years On](#)

Published in February 2020. The report highlights that people can expect to spend more of their lives in poor health, that improvements to life expectancy have stalled (and declined for women in the 10% most deprived areas), the health gap between healthy and deprived areas has grown, and that place does have an impact on health.

- [Portsmouth Water's Draft Water Resource Management Plan \(WRMP\) 2024](#)

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Portsmouth's Draft WRMP 2024 highlight the acute stresses that the area will face in over the next 50 years and the challenges in terms of securing water resources into the future, due to population growth and climate change. The Plan outlines how Portsmouth Water aim to confront and manage these issues to ensure secure reliable, healthy drinking water supplies and the timely provision of clean water to all residents.

- Updated evidence provided by Portsmouth City Council:
 - [Portsmouth City Council's Housing and Economic Land Availability Map \(2021\)](#)
 - [Portsmouth City Council's Housing Needs and housing targets update \(2021\)](#)
 - [Portsmouth City Council's Economic Development and Regeneration Strategy \(2019\)](#)
 - [Student housing and housing targets \(2021\)](#)
 - [The contribution of windfalls to housing supply \(2021\)](#)
 - [Space Standards background paper \(2021\)](#)
 - [Approach to Affordable Housing \(2021\)](#)
 - [Housing density background paper \(2021\)](#)
 - [Portsmouth City Masterplan Retail Focus Statement \(2020\)](#)
 - [Health background paper and Health Impact Assessment \(2021\)](#)
 - [Portsmouth City Council's Biodiversity Background Paper 2021](#)
 - [Mitigating climate change in Portsmouth background paper \(2021\)](#)
 - [Adapting to climate change in Portsmouth background paper \(2021\)](#)
 - [Heritage and Conservation background paper \(2021\)](#)

The key issues emerging from the policy context and baseline review remain broadly the same as those outlined in 2017, which are presented, as updated, below.

Key Issues

SA-1: Building a strong, competitive economy in Portsmouth

The main issues are:

A supply of land to establish fledgling businesses and grow the existing ones

- Supporting a rise in GVA while also creating a more diverse employment market to create a balanced economy
- Providing suitable water frontage sites to support the marine sector
- Ensuring protection of land to provide a range of locations for new businesses, including small start ups
- Making provision for new facilities for the tourism and visitor economy as well as hotels and conference centres

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- Sixteen areas within the city are deprived and a stronger economy provides more opportunities to work
- Supporting infrastructure is needed to support further growth in the city

SA-2: Ensuring the vitality of the city centre and other town centres in Portsmouth

The main issues are:

- Ensuring the city centre achieves a mixture of retail, leisure, cultural and evening economy facilities
- Seeing the city centre become a residential and office location to support its diversification
- Adapting to compliment the role of internet shopping
- Allowing Gunwharf to maintain its role for factory outlet retailing to complement the city centre
- Supporting Southsea shopping centre
- Reviewing and supporting the District and Local Centres in Portsmouth
- Creating more office space in the city centre to support its regeneration

SA-3: Promoting sustainable transport in Portsmouth

The main issues are:

- Encouraging a modal shift and public realm improvements including expansion of Park and Ride
- Creating a walkable city where people take priority over the needs of the car
- Tackling congestion and air pollution
- The need for a better and safer network of routes for cyclists and walkers to connect to jobs, homes and leisure facilities
- Ensuring better access for the disabled to public transport
- Problems with on street car parking

SA-4: To tackle climate change, flooding and coastal change in Portsmouth

The main issues are:

- Reducing greenhouses gases
- Reducing flood risk to new and existing development
- Balancing provision of new defences with the tourist and visitor appeal of the promenade and seafront
- Balancing provision of new defences with the tourist and visitor appeal of the promenade and seafront
- Avoiding coastal squeeze or creating new saltwater habitats to replace those lost where possible
- Achieving high environmental standards on all new buildings, especially in the city centre

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SA-5: Delivering high-quality homes in Portsmouth

The main issues are:

- The housing shortage and the need for affordable, starter homes, provision of self-build plots and the private rented sector
- The need for more family homes, and providing dwellings with sufficient space for storage
- Re-use of brownfield land and problems with decontamination affecting the viability
- Housing for the disabled, the ageing population, young people, graduates and families
- High concentrations of HMOs presenting a challenge to the future sustainability of many of our city's communities

SA-6: To promote healthy communities

The main issues are:

- The high levels of deprivation and the prevalence of poor health and unemployment associated with it
- Improving accessibility to surgeries
- High levels of obesity and the need to get the population more active
- To design out crime
- Energy efficiency and fuel poverty in the existing stock
- The rising amount of dementia as the population ages, together with health care issues for the elderly
- Ensuring access to good quality greenspace

SA-7: Conserving and enhancing the historic townscape

The main issues are:

- Protecting and enhancing the historic environment and cultural townscape
- Encouraging retention of the historic heritage buildings and their reuse
- The careful siting of tall buildings in the context of placemaking
- Will it provide for increased access to and understanding and enjoyment of the historic environment?

SA-8: Requiring good urban design in Portsmouth

The main issues are:

- To ensure higher and bespoke standards of design that provide high quality place making
- To create a compact city with contemporary design and lifestyles
- To create rooftop gardens and green roofs for biodiversity in the city centre
- Creating connections that encourage walking and cycling and a modal shift

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SA-9: To conserve and enhance the natural environment in Portsmouth

The main issues are:

- Ensuring sufficient greenspace in Portsmouth to meet a range of needs from informal recreation to organised sports
- Protect and enhance the Solent European Marine Sites
- Protecting the Sites of Special Scientific Interest and improving them
- Providing a network of Local Wildlife Sites (SINCs) to encourage biodiversity throughout the city
- Mitigation and creation of Suitable Alternative Natural Greenspace (SANGs)
- Water quality in Portsmouth and Langstone Harbour

SA-10: Facilitating the sustainable use of natural resources in Portsmouth

The main issues are:

- To consider waste as a resource along other planning priorities
- Support the ambition of a 'zero waste' economy for Portsmouth
- Ensure sufficient WWTW capacity by keeping local facilities under review
- The need to monitor the availability of the safeguarded land at HM Naval Base and commercial docks
- Encourage the production of secondary and recycled aggregates
- Ensure safeguarded mineral resources and minerals and waste infrastructure are protected from incompatible uses–

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Appendix C - GIS analysis of sites

Developing the appraisal methodology

Given the number of site options and limited site-specific data availability it was not possible to simply discuss ('qualitative analysis') the merits of each site option under the SA framework.²³

As such, work was undertaken to develop a methodology suited to site options appraisal, whilst also reflecting the SA framework and topics as best as possible. The methodology essentially involved employing GIS datasets and measuring ('quantitative analysis') how each site option related to various constraint and opportunity features.

Two GIS tools were used to undertake the appraisal of site options depending on the feature and measurements required. These provided either a:

- Straight line distance from a feature to a site option and percentage overlap of any features within a site option. Measurements were taken from the closest boundary of the site option and the feature.
- or
- Distances calculated from a site option to a feature along a real-world network of roads and urban footpaths using Open Street Map. The network analyst tool helps to provide approximate real-world walking distances. Measurements are taken from the boundary of the site where it is within 20m of the road/ footpath network and is therefore assumed to have access.

The site options appraisal methodology is presented in **Table AC.1** below. It sets out the criteria and thresholds as well as the GIS tool used and provides further commentary as necessary. The table recognises data limitations. It is important to be clear that the aim of categorising the performance of site options is to aid differentiation, i.e. to highlight instances of site options performing relatively well/ poorly. The intention is not to indicate a 'significant effect'.²⁴

²³ Qualitative analysis of site options would only have been possible were time/resources available to generate data/understanding for all site options through site visits and discussion with promoters. Without this data/understanding, any attempt at qualitative analysis would have led to a risk of bias (e.g. sites that are being proactively promoted may have been found to perform favourably).

²⁴ Whilst Regulations require that the SA process identifies and evaluates significant effects of the draft plan and reasonable alternatives, there is no assumption that significant effects must be identified and evaluated for all site options considered.

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Table AC.1: Methodology for the assessment of site options

Criteria	'RAG' rules	Data and measurement	Commentary
Biodiversity			
European site (SAC, SPA or Ramsar site)	Red (R) = Within or adjacent Amber (A) = <2km Green (G) = >2km	Data provided by Natural England and includes sites lying outside of the Borough. Straight line distance/ overlap measurement.	It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a European site. This will be dependent on a variety of information, some of which is not available at this stage, such as the precise scale, type, design and layout of development as well as level of mitigation to be provided. It is also important to note that the Local Plan will be subject to Habitats Regulations Assessment and this will consider the likelihood of proposed development having a significant effect on European sites. It should also be noted that all net new housing within 5.6km would contribute to incombination recreational pressure according to current evidence. ²⁵
Brent Goose feeding grounds	Red (R) = Within or adjacent Amber (A) = <100m Green (G) = >100m	Data provided by Portsmouth City Council and Hampshire Biodiveristy Information Centre (HBIC). Straight line distance/ overlap measurement.	As above, it is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on biodiversity. This will highlight any sites that contain or are in close proximity to identified Brent Goose feeding grounds.
Site of Special Scientific Interest (SSSI)	Red (R) = <200m Amber (A) = <1km Green (G) = >1km	Data provided by Natural England and includes sites lying outside of the Borough. Straight line distance/ overlap measurement.	As above, it is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a European site. This criterion will help to highlight the SSSI that lies in closest proximity to the site and together with the criterion below for SSSI Impact Zones, it will help to differentiate between sites.
Local Nature Reserve	Red (R) = Includes or is adjacent Amber (A) = <50m Green (G) = >50m	Data provided by Natural England and includes sites lying outside of the Borough. Straight line distance/ overlap measurement.	There is one Local Nature Reserves (LNR) situated within the Borough and the RAG distances reflect this along with the assumption that these are of less significance and therefore less sensitive than internationally and nationally designated biodiversity.
Local Wildlife Sites	Red (R) = Includes or is adjacent Amber (A) = <50m Green (G) = >50m	Data provided by Portsmouth City Council and does not include sites lying outside of the Borough. Straight line distance/ overlap measurement.	There are a number of SINCS situated within the Borough and the RAG distances reflect this along with the assumption that these are of less significance and therefore less sensitive than internationally and nationally designated biodiversity.

²⁵ Bird Aware Solent

- Official -

Criteria	'RAG' rules	Data and measurement	Commentary
Priority habitats	Red (R) = Includes or is adjacent Amber (A) = <50m Green (G) = >50m	Data provided by Natural England and includes sites lying outside of the Borough. Straight line distance/ overlap measurement.	This seeks to flag if a development at a site could result in the loss of and therefore fragmentation of BAP priority habitats. It also helps to flag if there is the potential for disturbance to priority habitats within 50m of the site.
Ecological Network Opportunities	Red (R) = Includes or is adjacent Amber (A) = <50m Green (G) = >50m	Data provided by Hampshire Biodiveristy Information Centre (HBIC). Straight line distance/ overlap measurement.	This seeks to flag if a sites contains or is in close proximity to an area identified as provided an opportunity for an expanded ecological network in hampshire.
Environmental			
Surface water flood risk	Red (R) = Areas of high or very high surface water flood risk is present in the site Amber (A) = Areas of medium surface water flood risk is present in the site Green (G) = Areas of low or no surface water flood risk	Data provided by Portsmouth City Council. Straight line distance/ overlap measurement.	This criterion will help to identify sites that fall within areas at risk of surface water flooding. N.B. While it is important to avoid development in areas of high flood risk, there is the potential to address risk of surface water flooding at the development management stage through the use of appropriate mitigation, such as SuDS.
Southern Water observed flooding point	Amber (A) = Intersects Green (G) = Does not intersect	Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement.	
Tree Preservation Order	Red (R) = Intersects Green (G) = Does not intersect	Data provided by Portsmouth City Council and does not include features outside the Borough. Straight line distance/ overlap measurement.	Highlights if a site contains any Tree Preservation Orders (TPOs).
Air Quality Management Areas (AQMA)	Red (R) = Within or adjacent to AQMA Amber (A) = <50m from an AQMA	Data provided by Portsmouth City Council. Straight line distance/ overlap measurement.	50m has been assumed to represent AQMA buffer zones as these are not individually defined.

- Official -

Criteria	'RAG' rules	Data and measurement	Commentary
	Green (G) = >50m from an AQMA		
Conservation Area	Red (R) = Intersects or is adjacent Amber (A) = <50m Green (G) = >50m	Data provided by Portsmouth City Council and does not include conservation areas outside the Borough. Straight line distance/ overlap measurement.	It is appropriate to 'flag' a red where a site is within, intersects or is adjacent to a Conservation Area. It is also appropriate to flag sites that might more widely impact on the setting of a Conservation Area and a 50m threshold has been assumed. It is recognised that distance in itself is not a definitive guide to the likelihood or significance of effects on a heritage asset. It is also recognised that the historic environment encompasses more than just designated heritage assets. Whilst there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting, a limitation relates to the fact that it has not been possible to gather views from heritage specialists on sensitivity of assets / capacity to develop each of the sites. This is a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis rather than through a distance based criteria. It will also sometimes be the case that development can enhance heritage assets.
Historic Park or Garden	Red (R) = Adjacent Amber (A) = <50m Green (G) = >50m	Data provided by Historic England and includes assets lying outside of the Borough. Straight line distance/ overlap measurement.	As above.
Scheduled Monument	Red (R) = Intersects or is adjacent Amber (A) = <50m Green (G) = >50m	Data provided by Historic England and includes assets lying outside of the Borough. Straight line distance/ overlap measurement.	As above.
Listed building	Red (R) = Intersects or is adjacent Amber (A) = <50m Green (G) = >50m	Data provided by Historic England and includes assets lying outside of the Borough. Straight line distance/ overlap measurement.	As above.
Locally listed building	Red (R) = Intersects or is adjacent	Data provided by Portsmouth City Council and does not include features	As above.

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Criteria	'RAG' rules	Data and measurement	Commentary
	Amber (A) = <50m Green (G) = >50m	outside the Borough. Straight line distance/ overlap measurement.	
Archaeology	Red (R) = Intersects Green (G) = Does not intersect	Data provided by Portsmouth City Council and does not include features outside the Borough. Straight line distance/ overlap measurement.	It is assumed that any development within an area of archaeological restraint is more likely to contain archaeology. This does not mean that sites outside these areas cannot contain archaeology and this would be investigated further through any planning applications.
Social			
Strategic & local employment areas	Red (R) = >800m Amber (A) = 400-800m Green (G) = <400m	Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement.	Highlights walking distance to key strategic and local employment areas (industrial and business parks). There is no clear guidance on distance thresholds, and it is recognised that these facilities will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.
Loss of designated employment site	Red (R) = Loss of existing designated employment site Green (G) = No loss of designated employment site	Data provided by Portsmouth City Council. Straight line distance/ overlap measurement.	Considers the loss of an existing or allocated employment area.
Town centres	Red (R) = >800m Amber (A) = 400-800m Green (G) = <400m	Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement.	Highlights walking distance to a town centre (Portsmouth City Centre, Southsea Town Centre, District and Local Centres). There is no clear guidance on distance thresholds, and it is recognised that these facilities will often be reached by car or public transport. The thresholds therefore reflect the spread of the data.
Bus stop	Red (R) = >400m Green (G) = <400m	Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement.	Highlights walking distance to a bus stop. Department for Transport guidance ²⁶ suggests 400m as a walkable distance for those accessing a bus stop.
Train station	Amber (A) = >800m Green (G) = <800m	Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement.	Highlights walking distance to a train station. Department for Transport guidance ²⁷ does not suggest a walkable distance for a train station so it is assumed that 800m is appropriate. This is in line with what is suggested for access to community facilities.

²⁶ WebTag (December 2015) Unit A4.2 paragraph 6.4.5, Department for Transport

²⁷ Ibid

- Official -

Criteria	'RAG' rules	Data and measurement	Commentary
School	Red (R) = >800m Amber (A) = 400-800m Green (G) = <400m	Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement.	Highlights walking distance to primary and secondary schools. Department for Transport guidance ²⁸ suggests 800m as a walkable distance for those accessing community facilities.
Doctor/ Health Centre	Red (R) = >800m Amber (A) = 400-800m Green (G) = <400m	Data provided by Portsmouth City Council and does not include features outside the Borough. Network analyst measurement.	Highlights walking distance to hospitals, GPs and dentists. Department for Transport guidance ²⁹ suggests 800m as a walkable distance for those accessing community facilities.
Open space	Red (R) = >400m Amber (A) = <400m Green (G) = Adjacent	Data provided by Portsmouth City Council and includes features outside the Borough. Network analyst measurement.	Highlights the walking distance of site options to important areas of open and green space, which includes allotments and children's play areas). It is recognised that there may be other areas of open or green space that are not considered through this criterion. 400m is assumed to be a walkable distance for most.
Open space (loss)	Red (R) = Loss of open or green space Green (G) = No loss of open or green space	Data provided by Portsmouth City Council. Straight line distance/ overlap measurement.	The presumption is that a loss of open space will lead to a negative impact in relation to a range of SA topics. However it should be noted that some loss of open space may not necessarily be a negative effect if green infrastructure enhancements are initiated on-site or nearby but this is uncertain at this stage
Deprivation	Red (R) = Site does not intersect with an 'output area' that is relatively deprived Amber (A) = Any of the site intersects with an 'output area' that is relatively deprived i.e. in the 20-40% (2nd quintile) most deprived in the district. Green (G) = Any of the site intersects with an 'output	Data provided by Ministry of Housing, Communities and Local Government and includes features outside the Borough. Straight line distance/ overlap measurement.	Highlights site options that fall within an area of deprivation. Development in an area of relative deprivation (as measured by the Index of Multiple Deprivation) may support regeneration. However, it is recognised that this will be dependent on a variety of factors, including the level of improvements delivered in terms of community facilities.

²⁸ Ibid²⁹ Ibid

- Official -

Criteria	'RAG' rules	Data and measurement	Commentary
	area' that is relatively deprived (i.e. in the 0-20% (1st quintile) most deprived in the district		

Appraisal findings

Tables AC.2-AC.4 present appraisal findings in relation to the site options that have been a focus of plan-making. Specifically, the table presents an appraisal of the site options in terms of the appraisal criteria set out in Table AC.1, with performance categorised on a simple 'RAG' scale.

- Official -

Table AC.2: Assessment of site options (Biodiversity)

HELAA Ref	European Site (SAC, SPA or Ramsar)	Distance to Nearest Brent Goose Core Area (m)	Distance to Nearest Brent Goose Primary Support Area (m)	Distance to Nearest Brent Goose Secondary Support Area (m)	Distance to Nearest Brent Goose Low Use (m)	Distance to Nearest Brent Goose Candidate Area (m)	Distance to Nearest Brent Goose SPA Site (m)	Distance to Nearest SSSI (m)	Distance to Nearest Local Nature Reserve (m)	Distance to Nearest Local Wildlife Site (m)	Distance to Nearest Priority Habitat (m)	Distance to Nearest Ecological Network Opportunities (m)
ST01	G	G	G	G	G	G	G	G	G	G	G	A
CS01	G	G	G	G	G	G	G	G	G	G	G	G
COP01	G	G	G	G	G	G	G	G	G	G	G	G
CS02	G	G	G	G	G	G	G	G	G	G	G	G
NE06	G	G	G	G	G	G	G	G	G	G	G	G
FR02	G	G	G	G	G	G	G	G	G	G	G	G
DF02	G	G	G	G	G	G	G	G	G	G	A	G
HIO5	G	G	G	G	G	G	G	G	G	G	R	R
ST03	G	G	G	G	G	G	G	G	G	G	G	G
ST04	A	G	G	G	G	G	G	G	G	G	G	A
DF03	G	G	G	G	R	G	G	G	G	G	G	R
EC04	A	A	G	G	G	G	G	G	G	G	G	G
CD01	G	G	G	G	G	G	G	G	G	G	A	A
CD02	G	G	G	G	G	G	G	G	G	G	G	G
ST08	A	G	G	G	G	G	G	G	G	G	G	A
ST09	G	G	G	G	G	G	G	G	G	G	G	A
COP02	G	G	G	G	G	G	G	G	G	G	G	G
NE02	G	G	G	G	G	G	G	G	G	G	G	A
CD03	G	G	G	G	G	G	G	G	G	G	G	G
CD04	A	G	G	G	G	A	G	G	G	G	G	G
PA03	A	G	G	G	G	G	A	A	G	G	A	A

- Official -

HELAA Ref	European Site (SAC, SPA or Ramsar)	Distance to Nearest Brent Goose Core Area (m)	Distance to Nearest Brent Goose Primary Support Area (m)	Distance to Nearest Brent Goose Secondary Support Area (m)	Distance to Nearest Brent Goose Low Use (m)	Distance to Nearest Brent Goose Candidate Area (m)	Distance to Nearest Brent Goose SPA Site (m)	Distance to Nearest SSSI (m)	Distance to Nearest Local Nature Reserve (m)	Distance to Nearest Local Wildlife Site (m)	Distance to Nearest Priority Habitat (m)	Distance to Nearest Ecological Network Opportunities (m)
NE03	G	G	G	G	G	G	G	G	G	G	G	G
DF05	G	G	G	G	G	G	G	G	G	R	A	R
BA01	G	G	G	G	G	G	G	G	G	G	G	G
CD05	A	G	G	G	A	G	G	G	G	G	G	G
CD07	G	G	G	G	G	G	G	G	G	G	G	G
EC07	G	G	G	G	G	G	G	G	G	G	G	G
CD06	G	G	G	G	G	G	G	G	G	G	G	G
FR03	G	G	G	G	G	G	G	G	G	G	G	G
CD10	G	G	G	G	G	G	G	G	G	G	G	G
CD09	G	G	G	G	G	G	G	G	G	G	G	G
HI01	G	G	G	G	G	G	G	G	G	G	G	G
FR04	G	G	G	G	G	G	G	G	G	G	G	G
PA04	G	G	G	G	G	G	G	G	G	G	G	G
SJ02	G	G	G	G	G	G	G	G	G	G	G	G
FR01	G	G	G	G	G	G	G	G	G	G	G	G
ST07	G	G	G	G	G	G	G	G	G	G	G	G
NE07	G	G	G	G	G	G	G	G	G	G	G	G
EC08	G	G	G	G	G	G	G	G	G	G	G	G
SJ04	G	G	G	G	G	G	G	G	G	G	G	G
COP03	G	G	G	G	G	G	G	G	G	G	G	G
DF06	A	G	G	A	R	G	G	A	A	G	A	R
CD15	G	G	G	G	G	G	G	G	G	G	G	G
NE09	G	G	G	G	G	G	G	G	G	G	G	G

- Official -

HELAA Ref	European Site (SAC, SPA or Ramsar)	Distance to Nearest Brent Goose Core Area (m)	Distance to Nearest Brent Goose Primary Support Area (m)	Distance to Nearest Brent Goose Secondary Support Area (m)	Distance to Nearest Brent Goose Low Use (m)	Distance to Nearest Brent Goose Candidate Area (m)	Distance to Nearest Brent Goose SPA Site (m)	Distance to Nearest SSSI (m)	Distance to Nearest Local Nature Reserve (m)	Distance to Nearest Local Wildlife Site (m)	Distance to Nearest Priority Habitat (m)	Distance to Nearest Ecological Network Opportunities (m)
CD13	G	G	G	G	G	G	G	G	G	G	G	G
PA01	A	A	G	A	G	G	A	A	G	G	A	R
HI04	G	G	G	G	G	G	G	G	G	G	A	R
EC11	R	G	G	A	G	G	G	R	G	A	R	R
COS01	G	G	G	G	G	G	G	G	G	G	G	G
CD16	G	G	G	G	G	G	G	G	G	G	G	G
ST12	A	G	G	G	G	G	G	G	G	G	G	A
CD18	G	G	G	G	G	G	G	G	G	G	G	G
CD17	G	G	G	G	G	G	G	G	G	G	G	G
COS04	G	G	G	G	G	G	G	G	G	G	G	A
COS03	G	G	G	G	G	G	G	G	G	G	G	G
MI01	A	R	G	R	G	G	G	A	G	R	R	R
MI02	G	G	G	G	G	G	G	G	G	G	G	R
HI08	G	G	G	G	G	G	G	G	G	G	G	A
PA08	G	G	G	G	G	G	G	G	G	G	G	G
SJ06	G	G	G	G	G	G	G	G	G	G	G	A
SJ08	G	G	G	G	G	G	G	G	G	G	G	A
ST02	G	G	G	G	G	G	G	G	G	G	G	G
ST14	G	G	G	G	G	G	G	G	G	G	G	G
DF07	G	G	G	G	G	G	G	G	G	G	G	R
CD20	G	G	G	G	G	G	G	G	G	G	G	G
BA02	G	G	G	G	G	G	G	G	G	G	G	G
COP04	A	G	G	G	A	G	G	G	G	A	A	R

- Official -

HELAA Ref	European Site (SAC, SPA or Ramsar)	Distance to Nearest Brent Goose Core Area (m)	Distance to Nearest Brent Goose Primary Support Area (m)	Distance to Nearest Brent Goose Secondary Support Area (m)	Distance to Nearest Brent Goose Low Use (m)	Distance to Nearest Brent Goose Candidate Area (m)	Distance to Nearest Brent Goose SPA Site (m)	Distance to Nearest SSSI (m)	Distance to Nearest Local Nature Reserve (m)	Distance to Nearest Local Wildlife Site (m)	Distance to Nearest Priority Habitat (m)	Distance to Nearest Ecological Network Opportunities (m)
COP05	A	G	G	G	A	G	G	G	G	R	R	R
CD22	G	G	G	G	G	G	G	G	G	G	G	G
CD30	G	G	G	G	G	G	G	G	G	G	G	G
CD31	G	G	G	G	G	G	G	G	G	G	G	G
CD32	G	G	G	G	G	G	G	G	G	G	G	G
CD26	G	G	G	G	G	G	G	G	G	G	R	A
CD25	G	G	G	G	G	G	G	G	G	G	G	G
CD23	G	G	G	G	G	G	G	G	G	G	G	G
CD29	G	G	G	G	G	G	G	G	G	G	G	G
CD28	G	G	G	G	G	G	G	G	G	G	G	G
NE05	G	G	G	G	G	G	G	G	G	G	G	G
COS02	G	G	G	G	G	G	G	G	G	G	G	G
CD65	G	G	G	G	G	G	G	G	G	G	G	G
BA03	G	G	G	G	G	G	G	G	G	G	G	A
PA05A	G	G	G	G	G	G	G	A	G	G	A	R
DF08	A	G	G	G	A	G	G	A	G	G	A	R
COP07	G	G	G	G	G	G	G	G	G	G	G	A
CD37	G	G	G	G	G	G	G	G	G	G	G	G
CD34	G	G	G	G	G	G	G	G	G	G	G	G
CD49	G	G	G	G	G	G	G	G	G	G	G	G
CD51	G	G	G	G	G	G	G	G	G	G	G	G
CD63	G	G	G	G	G	G	G	G	G	G	G	G
CD64	G	G	G	G	G	G	G	G	G	G	G	G

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HELAA Ref	European Site (SAC, SPA or Ramsar)	Distance to Nearest Brent Goose Core Area (m)	Distance to Nearest Brent Goose Primary Support Area (m)	Distance to Nearest Brent Goose Secondary Support Area (m)	Distance to Nearest Brent Goose Low Use (m)	Distance to Nearest Brent Goose Candidate Area (m)	Distance to Nearest Brent Goose SPA Site (m)	Distance to Nearest SSSI (m)	Distance to Nearest Local Nature Reserve (m)	Distance to Nearest Local Wildlife Site (m)	Distance to Nearest Priority Habitat (m)	Distance to Nearest Ecological Network Opportunities (m)
ST17	R	A	G	G	A	G	G	G	G	G	G	R
CD21	G	G	G	G	G	G	G	G	G	G	G	G
ST05	G	G	G	G	G	G	G	G	G	G	G	G
CD11	G	G	G	G	G	G	G	G	G	G	G	G
HIO2	G	G	G	G	G	G	G	G	G	G	G	G
COS06	G	G	G	G	G	G	G	G	G	G	G	A
EC01	R	G	R	G	R	G	G	R	G	R	R	R
COS10	A	G	G	R	G	G	G	A	G	G	R	R
SJ15	G	G	G	G	G	G	G	G	G	G	G	A
HIO6	G	G	G	G	G	G	G	G	G	G	A	R
CD74	G	G	G	G	G	G	G	G	G	G	G	G
CS06	G	G	G	G	G	G	G	G	G	G	G	G
CD75	G	G	G	G	G	G	G	G	G	G	G	G
FR06	G	G	G	G	G	G	G	G	G	G	G	G
MI07	G	G	G	G	G	G	G	G	G	G	G	G
MI03	G	G	G	G	G	G	G	G	G	G	G	G
EC14	A	A	A	G	G	G	G	G	G	R	R	G
CD73	G	G	G	G	G	G	G	G	G	G	G	G
NE20	G	G	G	G	A	G	G	G	G	G	G	G
PA15	G	G	G	G	G	G	G	G	G	G	G	A
SJ12	G	G	G	G	G	G	G	G	G	G	G	G
SJ16	G	G	G	G	G	G	G	G	G	G	G	A
NE21	G	G	G	G	G	G	G	G	G	G	G	G

- Official -

HELAA Ref	European Site (SAC, SPA or Ramsar)	Distance to Nearest Brent Goose Core Area (m)	Distance to Nearest Brent Goose Primary Support Area (m)	Distance to Nearest Brent Goose Secondary Support Area (m)	Distance to Nearest Brent Goose Low Use (m)	Distance to Nearest Brent Goose Candidate Area (m)	Distance to Nearest Brent Goose SPA Site (m)	Distance to Nearest SSSI (m)	Distance to Nearest Local Nature Reserve (m)	Distance to Nearest Local Wildlife Site (m)	Distance to Nearest Priority Habitat (m)	Distance to Nearest Ecological Network Opportunities (m)
NE22	G	G	G	G	G	G	G	G	G	G	G	G
NE18	R	G	G	R	R	G	R	R	G	G	R	R
ST11	G	G	G	G	G	G	G	G	G	G	G	G
EC02B	G	A	G	G	G	G	G	G	G	G	G	G
NE19B	R	G	R	R	G	G	R	R	G	G	R	R
ST01	G	G	G	G	G	G	G	G	G	G	G	A
CS01	G	G	G	G	G	G	G	G	G	G	G	G
COP01	G	G	G	G	G	G	G	G	G	G	G	G
CS02	G	G	G	G	G	G	G	G	G	G	G	G
NE06	G	G	G	G	G	G	G	G	G	G	G	G
FR02	G	G	G	G	G	G	G	G	G	G	G	G
DF02	G	G	G	G	G	G	G	G	G	G	A	G
HIO5	G	G	G	G	G	G	G	G	G	G	R	R
ST03	G	G	G	G	G	G	G	G	G	G	G	G
ST04	A	G	G	G	G	G	G	G	G	G	G	A
DF03	G	G	G	G	R	G	G	G	G	G	G	R
EC04	A	A	G	G	G	G	G	G	G	G	G	G
CD01	G	G	G	G	G	G	G	G	G	G	A	A
CD02	G	G	G	G	G	G	G	G	G	G	G	G

- Official -

Table AC.3: Assessment of site options (Environmental)

HELAA Ref	Fluvial flood risk	Distance to Nearest Surface Water Hotspot (m)	Distance to Nearest Southern Water Observed Flooding Point (m)	Distance to Nearest TPO (m)	Distance to Nearest AQMA (m)	Distance to Nearest Conservation Area (m)	Distance to Nearest Historic Park or Garden (m)	Distance to Nearest Scheduled Monument (m)	Distance to Nearest Listed Building (m)	Distance to Nearest Locally Listed Building (m)	Distance to Nearest Area of Archaeological Restraint (m)
ST01	G	G	G	R	R	G	G	G	A	A	R
CS01	G	G	G	G	G	G	G	G	G	G	G
COP01	G	G	G	G	G	G	G	G	G	G	G
CS02	G	G	G	G	G	G	G	G	G	G	G
NE06	G	G	G	G	G	R	G	G	G	A	R
FR02	G	G	G	G	G	A	G	G	G	G	R
DF02	R	R	G	G	G	G	G	G	G	G	G
HIO5	R	G	G	G	R	G	G	G	G	G	R
ST03	G	G	G	A	R	G	G	G	G	G	G
ST04	G	G	G	A	G	G	G	A	G	G	R
DF03	A	G	G	G	R	G	G	G	G	G	G
EC04	G	G	G	R	R	G	G	R	R	G	G
CD01	G	G	G	R	G	G	A	G	R	A	R
CD02	G	G	G	G	G	G	G	G	G	G	G
ST08	G	G	G	R	G	A	G	G	A	G	R
ST09	G	G	G	G	G	G	G	G	G	G	G
COP02	G	G	G	G	G	G	G	G	G	G	G
NE02	R	R	G	G	G	G	G	G	G	G	G
CD03	G	G	G	G	G	G	G	G	G	G	R
CD04	G	G	G	A	G	A	G	G	A	A	R
PA03	R	G	G	G	G	G	G	G	G	G	G

- Official -

HELAA Ref	Fluvial flood risk	Distance to Nearest Surface Water Hotspot (m)	Distance to Nearest Southern Water Observed Flooding Point (m)	Distance to Nearest TPO (m)	Distance to Nearest AQMA (m)	Distance to Nearest Conservation Area (m)	Distance to Nearest Historic Park or Garden (m)	Distance to Nearest Scheduled Monument (m)	Distance to Nearest Listed Building (m)	Distance to Nearest Locally Listed Building (m)	Distance to Nearest Area of Archaeological Restraint (m)
NE03	G	G	G	G	G	A	G	G	A	G	R
DF05	G	G	G	G	G	G	G	A	G	G	R
BA01	G	G	G	G	G	G	G	G	G	G	R
CD05	G	G	G	A	G	G	G	G	A	G	R
CD07	G	G	G	G	G	R	G	G	G	A	R
EC07	R	G	G	G	R	G	G	G	A	A	G
CD06	G	R	G	A	G	G	G	G	A	G	R
FR03	G	G	G	G	G	A	G	G	G	G	R
CD10	G	G	G	G	G	G	G	G	G	G	G
CD09	G	G	G	G	G	A	G	G	G	G	R
HI01	G	G	G	G	R	G	G	G	G	G	R
FR04	G	G	G	G	G	R	G	G	G	G	R
PA04	G	G	G	G	G	G	G	G	G	G	G
SJ02	G	G	G	A	G	G	G	G	A	G	G
FR01	G	G	G	G	G	R	G	G	G	A	R
ST07	G	G	G	G	G	G	G	G	G	G	G
NE07	G	G	G	G	G	R	G	G	G	G	R
EC08	R	G	G	G	G	G	G	G	G	G	G
SJ04	R	G	G	R	G	G	G	G	G	A	G
COP03	G	G	G	G	G	G	G	G	G	G	G
DF06	R	R	G	G	G	G	G	G	G	G	G
CD15	G	G	G	G	G	G	G	G	G	G	G
NE09	G	G	G	G	G	R	G	G	G	A	R

- Official -

HELAA Ref	Fluvial flood risk	Distance to Nearest Surface Water Hotspot (m)	Distance to Nearest Southern Water Observed Flooding Point (m)	Distance to Nearest TPO (m)	Distance to Nearest AQMA (m)	Distance to Nearest Conservation Area (m)	Distance to Nearest Historic Park or Garden (m)	Distance to Nearest Scheduled Monument (m)	Distance to Nearest Listed Building (m)	Distance to Nearest Locally Listed Building (m)	Distance to Nearest Area of Archaeological Restraint (m)
CD13	G	G	G	A	G	A	G	G	A	A	R
PA01	A	G	G	G	G	G	G	G	G	G	G
HI04	R	R	G	G	R	G	G	G	G	G	R
EC11	R	G	G	G	G	G	G	A	G	G	G
COS01	G	R	G	G	G	G	G	G	G	G	R
CD16	G	G	G	G	G	G	G	G	A	G	G
ST12	R	G	G	R	G	G	G	G	A	A	R
CD18	G	G	G	G	G	G	G	G	A	G	G
CD17	G	G	G	R	R	R	G	G	R	R	R
COS04	G	R	G	G	G	G	G	G	G	G	R
COS03	G	G	G	G	R	G	G	G	A	G	R
MI01	A	G	G	G	R	G	G	G	R	A	R
MI02	G	G	G	G	G	A	G	G	G	G	R
HI08	A	R	G	G	R	G	G	G	G	R	R
PA08	G	G	G	G	G	G	G	G	G	G	R
SJ06	R	G	G	R	R	G	G	G	G	G	G
SJ08	A	G	G	R	G	G	G	G	A	G	G
ST02	G	G	G	G	G	G	G	G	G	G	G
ST14	G	G	G	A	G	G	G	G	A	A	G
DF07	R	R	G	G	G	G	G	G	G	G	G
CD20	G	G	G	G	G	G	G	G	G	G	G
BA02	G	G	G	G	G	G	G	G	G	G	G
COP04	R	R	G	A	G	G	G	A	G	G	R

- Official -

HELAA Ref	Fluvial flood risk	Distance to Nearest Surface Water Hotspot (m)	Distance to Nearest Southern Water Observed Flooding Point (m)	Distance to Nearest TPO (m)	Distance to Nearest AQMA (m)	Distance to Nearest Conservation Area (m)	Distance to Nearest Historic Park or Garden (m)	Distance to Nearest Scheduled Monument (m)	Distance to Nearest Listed Building (m)	Distance to Nearest Locally Listed Building (m)	Distance to Nearest Area of Archaeological Restraint (m)
COP05	R	R	G	R	G	G	G	R	G	G	R
CD22	G	G	G	G	G	G	G	G	G	G	G
CD30	G	G	G	G	G	G	G	G	G	G	G
CD31	G	G	G	G	G	G	G	G	G	G	G
CD32	G	G	G	G	G	G	G	G	G	G	G
CD26	G	G	G	R	G	G	G	G	A	G	G
CD25	G	G	G	G	G	G	G	G	G	G	G
CD23	G	G	G	R	G	A	G	G	A	A	G
CD29	G	G	G	G	G	G	G	G	G	A	G
CD28	G	G	G	G	G	G	G	G	A	A	G
NE05	G	G	G	G	G	G	G	G	G	G	G
COS02	G	R	G	G	G	G	G	G	G	G	R
CD65	G	G	G	G	G	R	G	G	A	A	R
BA03	G	G	G	G	G	G	G	G	G	G	G
PA05A	G	G	G	G	G	G	G	G	G	G	R
DF08	R	G	G	G	G	G	G	G	G	G	G
COP07	G	G	G	G	R	G	G	G	G	G	G
CD37	G	G	G	G	G	G	G	G	G	G	G
CD34	G	G	G	G	G	G	G	G	G	G	G
CD49	G	G	G	G	G	G	G	G	G	G	G
CD51	G	G	G	G	G	G	G	G	A	G	G
CD63	G	G	G	G	G	G	G	G	G	G	G
CD64	G	G	G	G	G	G	G	G	G	G	G

- Official -

HELAA Ref	Fluvial flood risk	Distance to Nearest Surface Water Hotspot (m)	Distance to Nearest Southern Water Observed Flooding Point (m)	Distance to Nearest TPO (m)	Distance to Nearest AQMA (m)	Distance to Nearest Conservation Area (m)	Distance to Nearest Historic Park or Garden (m)	Distance to Nearest Scheduled Monument (m)	Distance to Nearest Listed Building (m)	Distance to Nearest Locally Listed Building (m)	Distance to Nearest Area of Archaeological Restraint (m)
ST17	R	G	G	R	G	G	A	G	G	G	R
CD21	G	G	G	G	R	G	G	G	G	A	G
ST05	G	G	G	R	G	R	G	G	G	A	G
CD11	G	G	G	G	G	R	G	G	G	G	R
HIO2	G	G	G	G	G	R	G	G	G	A	G
COS06	G	R	G	G	G	G	G	G	G	G	R
EC01	A	G	G	G	G	G	G	R	A	G	G
COS10	R	G	G	G	R	G	G	G	G	G	R
SJ15	G	G	G	R	R	G	G	G	R	R	G
HIO6	R	R	G	A	R	G	G	A	A	G	R
CD74	G	G	G	G	G	G	G	G	G	G	G
CS06	G	G	G	G	G	G	G	G	G	G	G
CD75	G	G	G	G	G	R	G	G	G	G	R
FR06	G	G	G	G	G	G	G	G	G	R	G
MI07	G	G	G	G	G	G	G	G	G	G	G
MI03	G	G	G	G	G	R	G	G	G	G	R
EC14	G	G	G	G	G	G	G	G	R	G	G
CD73	G	G	G	G	G	G	G	G	G	G	G
NE20	G	G	G	G	G	G	G	G	G	G	G
PA15	G	G	G	G	G	G	G	G	G	G	G
SJ12	R	R	G	R	G	G	G	G	G	G	G
SJ16	R	R	G	G	G	G	G	G	G	G	G
NE21	G	G	G	G	G	G	G	G	G	A	R

- Official -

HELAA Ref	Fluvial flood risk	Distance to Nearest Surface Water Hotspot (m)	Distance to Nearest Southern Water Observed Flooding Point (m)	Distance to Nearest TPO (m)	Distance to Nearest AQMA (m)	Distance to Nearest Conservation Area (m)	Distance to Nearest Historic Park or Garden (m)	Distance to Nearest Scheduled Monument (m)	Distance to Nearest Listed Building (m)	Distance to Nearest Locally Listed Building (m)	Distance to Nearest Area of Archaeological Restraint (m)
NE22	G	G	G	G	G	R	G	G	A	G	R
NE18	R	G	G	G	G	G	G	G	G	G	G
ST11	G	G	G	R	G	A	G	G	A	A	G
EC02B	G	G	G	G	R	G	G	G	G	G	G
NE19B	R	G	G	G	G	G	G	G	R	G	R
ST01	G	G	G	R	R	G	G	G	A	A	R
CS01	G	G	G	G	G	G	G	G	G	G	G
COP01	G	G	G	G	G	G	G	G	G	G	G
CS02	G	G	G	G	G	G	G	G	G	G	G
NE06	G	G	G	G	G	R	G	G	G	A	R
FR02	G	G	G	G	G	A	G	G	G	G	R
DF02	R	R	G	G	G	G	G	G	G	G	G
HIO5	R	G	G	G	R	G	G	G	G	G	R
ST03	G	G	G	A	R	G	G	G	G	G	G
ST04	G	G	G	A	G	G	G	A	G	G	R
DF03	A	G	G	G	R	G	G	G	G	G	G
EC04	G	G	G	R	R	G	G	R	R	G	G
CD01	G	G	G	R	G	G	A	G	R	A	R
CD02	G	G	G	G	G	G	G	G	G	G	G

- Official -

Table AC.4: Assessment of site options (Social)

HELAA Ref	Strategic & local employment areas (distance)	Loss of Designated Employment Site	District and Local Centre (m)	Distance to Nearest Bus Stop (m)	Distance to Nearest Train Station (m)	Distance to Nearest Primary School (m)	Distance to Nearest Secondary School (m)	Distance to Nearest Doctor/ Health Centre (m)	Distance to Nearest Open Space	Loss of Open Space	Development in Area of Relative Deprivation
ST01	G	G	G	R	R	G	G	G	A	A	R
CS01	G	G	G	G	G	G	G	G	G	G	G
COP01	G	G	G	G	G	G	G	G	G	G	G
CS02	G	G	G	G	G	G	G	G	G	G	G
NE06	G	G	G	G	G	R	G	G	G	A	R
FR02	G	G	G	G	G	A	G	G	G	G	R
DF02	R	R	G	G	G	G	G	G	G	G	G
HIO5	R	G	G	G	R	G	G	G	G	G	R
ST03	G	G	G	A	R	G	G	G	G	G	G
ST04	G	G	G	A	G	G	G	A	G	G	R
DF03	A	G	G	G	R	G	G	G	G	G	G
EC04	G	G	G	R	R	G	G	R	R	G	G
CD01	G	G	G	R	G	G	A	G	R	A	R
CD02	G	G	G	G	G	G	G	G	G	G	G
ST08	G	G	G	R	G	A	G	G	A	G	R
ST09	G	G	G	G	G	G	G	G	G	G	G
COP02	G	G	G	G	G	G	G	G	G	G	G
NE02	R	R	G	G	G	G	G	G	G	G	G
CD03	G	G	G	G	G	G	G	G	G	G	R
CD04	G	G	G	A	G	A	G	G	A	A	R
PA03	R	G	G	G	G	G	G	G	G	G	G
NE03	G	G	G	G	G	A	G	G	A	G	R
DF05	G	G	G	G	G	G	G	A	G	G	R

- Official -

HELAA Ref	Strategic & local employment areas (distance)	Loss of Designated Employment Site	District and Local Centre (m)	Distance to Nearest Bus Stop (m)	Distance to Nearest Train Station (m)	Distance to Nearest Primary School (m)	Distance to Nearest Secondary School (m)	Distance to Nearest Doctor/ Health Centre (m)	Distance to Nearest Open Space	Loss of Open Space	Development in Area of Relative Deprivation
BA01	G	G	G	G	G	G	G	G	G	G	R
CD05	G	G	G	A	G	G	G	G	A	G	R
CD07	G	G	G	G	G	R	G	G	G	A	R
EC07	R	G	G	G	R	G	G	G	A	A	G
CD06	G	R	G	A	G	G	G	G	A	G	R
FR03	G	G	G	G	G	A	G	G	G	G	R
CD10	G	G	G	G	G	G	G	G	G	G	G
CD09	G	G	G	G	G	A	G	G	G	G	R
HI01	G	G	G	G	R	G	G	G	G	G	R
FR04	G	G	G	G	G	R	G	G	G	G	R
PA04	G	G	G	G	G	G	G	G	G	G	G
SJ02	G	G	G	A	G	G	G	G	A	G	G
FR01	G	G	G	G	G	R	G	G	G	A	R
ST07	G	G	G	G	G	G	G	G	G	G	G
NE07	G	G	G	G	G	R	G	G	G	G	R
EC08	R	G	G	G	G	G	G	G	G	G	G
SJ04	R	G	G	R	G	G	G	G	G	A	G
COP03	G	G	G	G	G	G	G	G	G	G	G
DF06	R	R	G	G	G	G	G	G	G	G	G
CD15	G	G	G	G	G	G	G	G	G	G	G
NE09	G	G	G	G	G	R	G	G	G	A	R
CD13	G	G	G	A	G	A	G	G	A	A	R
PA01	A	G	G	G	G	G	G	G	G	G	G
HI04	R	R	G	G	R	G	G	G	G	G	R

- Official -

HELAA Ref	Strategic & local employment areas (distance)	Loss of Designated Employment Site	District and Local Centre (m)	Distance to Nearest Bus Stop (m)	Distance to Nearest Train Station (m)	Distance to Nearest Primary School (m)	Distance to Nearest Secondary School (m)	Distance to Nearest Doctor/ Health Centre (m)	Distance to Nearest Open Space	Loss of Open Space	Development in Area of Relative Deprivation
EC11	R	G	G	G	G	G	G	A	G	G	G
COS01	G	R	G	G	G	G	G	G	G	G	R
CD16	G	G	G	G	G	G	G	G	A	G	G
ST12	R	G	G	R	G	G	G	G	A	A	R
CD18	G	G	G	G	G	G	G	G	A	G	G
CD17	G	G	G	R	R	R	G	G	R	R	R
COS04	G	R	G	G	G	G	G	G	G	G	R
COS03	G	G	G	G	R	G	G	G	A	G	R
MI01	A	G	G	G	R	G	G	G	R	A	R
MI02	G	G	G	G	G	A	G	G	G	G	R
HI08	A	R	G	G	R	G	G	G	G	R	R
PA08	G	G	G	G	G	G	G	G	G	G	R
SJ06	R	G	G	R	R	G	G	G	G	G	G
SJ08	A	G	G	R	G	G	G	G	A	G	G
ST02	G	G	G	G	G	G	G	G	G	G	G
ST14	G	G	G	A	G	G	G	G	A	A	G
DF07	R	R	G	G	G	G	G	G	G	G	G
CD20	G	G	G	G	G	G	G	G	G	G	G
BA02	G	G	G	G	G	G	G	G	G	G	G
COP04	R	R	G	A	G	G	G	A	G	G	R
COP05	R	R	G	R	G	G	G	R	G	G	R
CD22	G	G	G	G	G	G	G	G	G	G	G
CD30	G	G	G	G	G	G	G	G	G	G	G
CD31	G	G	G	G	G	G	G	G	G	G	G

- Official -

HELAA Ref	Strategic & local employment areas (distance)	Loss of Designated Employment Site	District and Local Centre (m)	Distance to Nearest Bus Stop (m)	Distance to Nearest Train Station (m)	Distance to Nearest Primary School (m)	Distance to Nearest Secondary School (m)	Distance to Nearest Doctor/ Health Centre (m)	Distance to Nearest Open Space	Loss of Open Space	Development in Area of Relative Deprivation
CD32	G	G	G	G	G	G	G	G	G	G	G
CD26	G	G	G	R	G	G	G	G	A	G	G
CD25	G	G	G	G	G	G	G	G	G	G	G
CD23	G	G	G	R	G	A	G	G	A	A	G
CD29	G	G	G	G	G	G	G	G	G	A	G
CD28	G	G	G	G	G	G	G	G	A	A	G
NE05	G	G	G	G	G	G	G	G	G	G	G
COS02	G	R	G	G	G	G	G	G	G	G	R
CD65	G	G	G	G	G	R	G	G	A	A	R
BA03	G	G	G	G	G	G	G	G	G	G	G
PA05A	G	G	G	G	G	G	G	G	G	G	R
DF08	R	G	G	G	G	G	G	G	G	G	G
COP07	G	G	G	G	R	G	G	G	G	G	G
CD37	G	G	G	G	G	G	G	G	G	G	G
CD34	G	G	G	G	G	G	G	G	G	G	G
CD49	G	G	G	G	G	G	G	G	G	G	G
CD51	G	G	G	G	G	G	G	G	A	G	G
CD63	G	G	G	G	G	G	G	G	G	G	G
CD64	G	G	G	G	G	G	G	G	G	G	G
ST17	R	G	G	R	G	G	A	G	G	G	R
CD21	G	G	G	G	R	G	G	G	G	A	G
ST05	G	G	G	R	G	R	G	G	G	A	G
CD11	G	G	G	G	G	R	G	G	G	G	R
HIO2	G	G	G	G	G	R	G	G	G	A	G

- Official -

HELAA Ref	Strategic & local employment areas (distance)	Loss of Designated Employment Site	District and Local Centre (m)	Distance to Nearest Bus Stop (m)	Distance to Nearest Train Station (m)	Distance to Nearest Primary School (m)	Distance to Nearest Secondary School (m)	Distance to Nearest Doctor/ Health Centre (m)	Distance to Nearest Open Space	Loss of Open Space	Development in Area of Relative Deprivation
COS06	G	R	G	G	G	G	G	G	G	G	R
EC01	A	G	G	G	G	G	G	R	A	G	G
COS10	R	G	G	G	R	G	G	G	G	G	R
SJ15	G	G	G	R	R	G	G	G	R	R	G
HI06	R	R	G	A	R	G	G	A	A	G	R
CD74	G	G	G	G	G	G	G	G	G	G	G
CS06	G	G	G	G	G	G	G	G	G	G	G
CD75	G	G	G	G	G	R	G	G	G	G	R
FR06	G	G	G	G	G	G	G	G	G	R	G
MI07	G	G	G	G	G	G	G	G	G	G	G
MI03	G	G	G	G	G	R	G	G	G	G	R
EC14	G	G	G	G	G	G	G	G	R	G	G
CD73	G	G	G	G	G	G	G	G	G	G	G
NE20	G	G	G	G	G	G	G	G	G	G	G
PA15	G	G	G	G	G	G	G	G	G	G	G
SJ12	R	R	G	R	G	G	G	G	G	G	G
SJ16	R	R	G	G	G	G	G	G	G	G	G
NE21	G	G	G	G	G	G	G	G	G	A	R
NE22	G	G	G	G	G	R	G	G	A	G	R
NE18	R	G	G	G	G	G	G	G	G	G	G
ST11	G	G	G	R	G	A	G	G	A	A	G
EC02B	G	G	G	G	R	G	G	G	G	G	G
NE19B	R	G	G	G	G	G	G	G	R	G	R
ST01	G	G	G	R	R	G	G	G	A	A	R

- Official -

HELAA Ref	Strategic & local employment areas (distance)	Loss of Designated Employment Site	District and Local Centre (m)	Distance to Nearest Bus Stop (m)	Distance to Nearest Train Station (m)	Distance to Nearest Primary School (m)	Distance to Nearest Secondary School (m)	Distance to Nearest Doctor/ Health Centre (m)	Distance to Nearest Open Space	Loss of Open Space	Development in Area of Relative Deprivation
CS01	G	G	G	G	G	G	G	G	G	G	G
COP01	G	G	G	G	G	G	G	G	G	G	G
CS02	G	G	G	G	G	G	G	G	G	G	G
NE06	G	G	G	G	G	R	G	G	G	A	R
FR02	G	G	G	G	G	A	G	G	G	G	R
DF02	R	R	G	G	G	G	G	G	G	G	G
HI05	R	G	G	G	R	G	G	G	G	G	R
ST03	G	G	G	A	R	G	G	G	G	G	G
ST04	G	G	G	A	G	G	G	A	G	G	R
DF03	A	G	G	G	R	G	G	G	G	G	G
EC04	G	G	G	R	R	G	G	R	R	G	G
CD01	G	G	G	R	G	G	A	G	R	A	R
CD02	G	G	G	G	G	G	G	G	G	G	G

