

Sustainability Appraisal (SA) for the Portsmouth Local Plan

**SA Report Non-Technical Summary (NTS)
to accompany Regulation 19 consultation**

Portsmouth City Council

March 2024

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Quality information

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Revision History

Revision	Revision date	Details	Name	Position
V1	January 2024	Draft for client review	GB	Principal Planning Policy Officer, PCC
V2	February 2024	Updated draft for client review	GB	Principal Planning Policy Officer, PCC
V3	March 2024	Final for consultation	GB	Principal Planning Policy Officer, PCC

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1. Introduction

Introduction to SA

AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Portsmouth Local Plan. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement and is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.

Structure of the SA Report/ this NTS

In-line with the Regulations, a report (known as the SA Report) must be published for consultation alongside the draft plan that essentially “*identifies, describes and evaluates*” the likely significant effects of implementing “*the plan, and reasonable alternatives*”.¹ The report must then be considered, alongside consultation responses, when finalising the plan.

More specifically, the SA Report should answer the following three questions²:

1. What has Plan-making / SA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
2. What are the SA findings at this stage?
 - i.e., in relation to the draft plan.
3. What happens next?
 - What steps will be taken to finalise (and monitor) the plan.

The SA Report is structured in parts that each seek to address these three questions. This is a Non-Technical Summary (NTS) of the SA Report, and it is similarly structured with chapters dedicated to each question.

The SA Report and NTS accompanies the draft Portsmouth Local Plan for Regulation 19 consultation.

The SA Report (and NTS) builds upon initial work undertaken in the Interim SA Report which accompanied the draft plan in consultation in 2021.

What is the Local Plan seeking to achieve?

The Portsmouth Local Plan seeks to achieve the Imagine Portsmouth 2040 Vision³ which was adopted in 2021:

“In 2040 Portsmouth will be an island city with an incredible waterfront, a rich cultural heritage, and a strong maritime history. With a naval base, international port, and strong links across the south, we are the centre of culture and enterprise for our

¹ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

² See **Appendix A** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

³ [Imagine Portsmouth 2040 Vision](#)

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area. In 2040 we are very proud of Portsmouth, how we behave towards each other and how it feels to live here.”

Six strategic objectives have been developed from this high-level vision that can be summarised as: a healthy and happy city, a city rich in culture and creativity, a city with a thriving economy, a city of lifelong learning, a green city, and a city with easy travel.

What is the scope of the SA?

The scope of the SA was established in 2017 and has been continuously updated since (including in Appendix C of the SA Report). The scope is summarised by a series of ten SA objectives that form the structure for the assessment. Each option and proposal in the plan identified for SA has been assessed against each of these SA objectives. The main report (Chapter 3) includes the SA framework which provides assessment criteria and potential indicators to assist the assessment. The series of SA objectives are:

- **SA-1:** Building a strong, competitive economy in Portsmouth
- **SA-2:** Ensuring the vitality of the city centre and other town centres in Portsmouth
- **SA-3:** Promoting sustainable transport in Portsmouth
- **SA-4:** To tackle climate change, flooding and coastal change in Portsmouth
- **SA-5:** Delivering high quality homes in Portsmouth
- **SA-6:** To promote healthy communities
- **SA-7:** Conserving and enhancing the historic townscape
- **SA-8:** Requiring good urban design in Portsmouth
- **SA-9:** Conserving and enhancing the natural environment in Portsmouth
- **SA-10:** Facilitating the sustainable use of natural resources in Portsmouth

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2. Plan-making/ SA up to this point

Introduction

In line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives, and how the Council then considered the appraisal findings when finalising the Local Plan. Part 1 of the SA Report is given over to:

1. Presenting the reasons for selecting the alternatives dealt with (summarised under the heading ‘establishing reasonable alternatives’ below).
2. Presenting a summary of the appraisal of the alternatives (summarised under the ‘appraising reasonable alternatives’ heading below); and
3. Explaining the Council’s reasons for selecting the preferred approach (summarised under the ‘developing the preferred approach’ heading below)

Importantly, this work builds upon existing SA work undertaken at the Issues and Options stage (2017) and the Regulation 18 ‘draft plan’ stage reported in the Interim SA Report (2021). Alternatives at this stage do not repeat any alternatives work already undertaken to date, alternatives are explored considering feedback from consultation to date and the updated draft plan being presented for Regulation 19 consultation.

Establishing reasonable alternatives

The SA Report (Chapter 5) explores in detail the evidence around the housing and employment growth needs in the city and potential locations to accommodate these needs. Particular attention is paid to feedback from consultation and changes that have been made in the latest iteration of the plan.

Alternatives for housing growth

Continued evidence development highlights that Portsmouth is unable to meet housing needs in full based upon the Government’s Standard Methodology calculation. Informed by the Housing and Economic Development Needs Assessment (HEDNA), the following housing needs and supply forecast is presented:

Source	No. of homes	
Strategic development sites	Portsmouth City Centre	4,158
	Tipner West & Horsea Island	814
	Tipner East	1,056
	St James’ Hospital and Langstone Campus	417
	Fratton Park and the Pompey Centre	710
Strategic allocations	Port Solent	500
	St John’s College	212
	Fraser Range	134
	The News Centre, Hilsea	100

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Source		No. of homes
	Somers Orchard, Somerstown	565
HELAA sites	Small/ medium sites <1ha with capacity for 5 or more homes.	1,543
	Sites >1ha with capacity for 5 or more homes.	457
	'Non-Implementation 'Discount' (15%)	-300
Net completions	Sites of 5 or more dwellings 2020-23	305
Permissions outstanding	As of 31 st March 2023	1,353
	'Non-Implementation 'Discount' (15%)	-203
Windfall estimate	Small sites <5 homes	1,007
Equivalent contributions	HMOs	731
	C2 accommodation completions	44
Total supply		13,603
Housing needs	Standard Methodology	17,980
	HEDNA trend-based population projections	13,100
	HEDNA jobs growth lower-end estimations	8,620
Need/ supply balance	Standard Methodology	-4,377
	HEDNA trend-based population projections	+503
	HEDNA jobs growth lower-end estimations	+4,983
Potential contributions from outside the city (DtC)	Fareham	800
Need/ supply balance including DtC	Standard Methodology	-3,577
	HEDNA trend-based population projections	+1,303
	HEDNA jobs growth lower-end estimations	+5,783

Whilst a range of housing options have been explored through the SA to date, alternatives at this stage have sought to assist the Council in developing sequential testing (for development encroaching on flood zones) and in thoroughly testing wider options housing growth that exclude additional housing development at the Tipner West and Horsea Island East strategic site (located within a flood risk zone).

The following alternatives for housing growth are presented at this stage for SA:

- **Option H1:** Only develop all deliverable and developable HELAA sites within Flood Risk Zone (FRZ) 1 (This option will significantly fall short of meeting the housing need).
- **Option H2:** Maximise housing delivery⁴ (where possible) on all deliverable and developable HELAA sites within FRZ1 (NB, this option will still fall significantly short of meeting the housing need).
- **Option H3:** Develop some areas within FRZ2/ 3⁵ reflective of the current plan strategy (NB, this option is expected to boost the contribution to housing supply

⁴ See Para 5.56

⁵ Excluding coastal Flood Risk Zone 3b as agreed with the Environment Agency and neighbouring authorities.

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and meet the lower end estimates for housing needs, but is still unlikely to meet the housing need in full using the standard methodology)

- **Option H4:** Maximise housing delivery⁶ (where possible) on sites, including sites within FRZ2/ 3⁷ (NB, this option is expected to slightly exceed the supply anticipated under Option 3, but is still considered unlikely to meet the housing need in full using the standard methodology)

Avoiding development in Flood Risk Zones 2 and/ or 3 will mean avoiding development at some key sites (sites where >50% of the land intersects Flood Risk Zones 2 and/ or 3), these include:

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

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

- Somers Orchard, Somerstown – this site is in FRZ1. As a Council owned estate, a higher density scheme delivering 700 homes in total is being tested (delivering an additional 134 homes than the currently estimated 566 dwellings). Applicable to Options H2 and H4.
- The News Centre, Hilsea – a housing only scheme (i.e., no delivery of a new bus depot) is being tested as an alternative which could deliver 200 homes in total (100 additional homes to the currently estimated 100 dwellings). This is only applicable to Option H4 as it lies within FRZ2/ 3.
- City Centre – further intensification and regeneration at the city centre could boost housing supply to potentially around 5,000 new homes (an additional 842 homes to that currently estimated) though this is notably likely to impact strategic employment growth targets. Applicable to Options H2 and H4 as FRZ1.
- Port Solent – further intensification and regeneration at Port Solent could increase the number of homes delivered at this site to around 600-700 homes (100-200 additional homes to that currently estimated). This is only applicable to Option H4 as it lies within FRZ2/ 3.
- St James' & Langstone Campus – a small part of this site lies within FRZ2/ 3. An option for increased development at this part of the site could deliver around 200 homes (an additional 80 homes to that currently identified). Applicable to Options H2 and H4 with development focused within FRZ1.
- Tipner West and Horsea Island East – maximising delivery on this site could see a total of 1,250 new homes. This is at the top end of the range of new homes for which the site is allocated. This is only applicable to Option H4, though it is recognised that this could emerge under H3 as well.

⁶ See Para 5.56

⁷ Excluding coastal Flood Risk Zone 3b as agreed with the Environment Agency and neighbouring authorities.

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Alternatives for employment growth

With the HEDNA identifying employment growth levels somewhat lower than the sub-regional PfSH work has estimated, it is considered appropriate at this stage to investigate the key sites underpinning the employment growth strategy and options for employment growth levels. These are notably constrained by a lack of suitable sites and competing housing needs.

The following alternatives are identified for SA, split into options for both office space and industrial/ warehousing space:

Office Space:

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

Industrial/ warehousing space:

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

Policy alternatives

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

Houses of Multiple occupation (HMOs)

HMOs meet the needs of those that require a more affordable housing option (including around 42% of students) and the Council includes HMOs in its land supply data given the large amount being permitted and delivered over recent years and the role they play in helping to meet the city's housing need. Most notably the HMO supply in Portsmouth is falling and affordability is worsening, and the supply of HMOs can reduce the availability of family-sized homes in the city. Given these implications for housing supply, the Council have identified a range of options for HMO policy directions. Policy directions may seek to place a percentage limit on

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HMOs within any given area, and there are options for the percentage level and radii distance that extends any application site. The options are summarised as follows:

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

First Homes

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

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

Three options have been identified in relation to First Homes:

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

Biodiversity Net Gain

Biodiversity net gain (BNG) is an important principle for development which has emerged over recent years as a means of creating and improving natural habitats and reversing biodiversity decline trends. BNG makes sure development has a measurably positive impact on biodiversity, compared to what was there before development.

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

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

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

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

Alternatives for assessment

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

Appraising reasonable alternatives

Presented below are the summary appraisal findings for the established housing growth options, employment growth options, and policy options. Two sets of employment growth options and options under three different policy themes follow the housing growth options. The detailed narrative explaining these findings is presented in Chapter 6 of the SA Report.

Methodology

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

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

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Alternatives for housing growth

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

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Alternatives for employment growth (office space)

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

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Alternatives for employment growth (industrial/ warehousing space)

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

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Alternative policy approaches (HMOs)

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

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Alternative policy approaches (First Homes)

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

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Alternative policy approaches (BNG)

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

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Developing the preferred approach

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

Housing growth options

The Council's **preferred option is Option H3: Develop additional areas within FRZ2/ 3 reflective of the current plan strategy (NB, this option is expected to boost contribution to housing supply and meet the lower end estimates for housing needs, but is still unlikely to meet housing needs in full using the standard methodology).**

Option H3 is the preferred approach and is fully evidenced by the comprehensive assessment undertaken in HELAA, which identifies all deliverable and developable sites that could accommodate five or more new homes. Option H3 generates a housing target of 680 net additional homes per year and meets as much of the City's objectively assessed housing need, as set out in the HEDNA (2023) as possible, in line with current national policy. It takes forward all HELAA sites, in flood zones 1, 2 and 3, as either strategic sites, site allocations or identified housing sites in Appendices 2 and 3 of the draft Local Plan. The HELAA provides robust evidence to show that there are no other suitable, available or achievable sites that could be taken forward.

If housing supply relied on sites solely within flood zone 1, Portsmouth would have a more significant deficit of homes delivered over the plan period when assessed against the housing need (using the standard methodology). The inclusion of sites within all three flood risk areas still falls short of meeting Portsmouth's housing need, signifying the importance of their inclusion. There are no sites that have been omitted based on flood risk, and therefore careful consideration is given to management and mitigation of flood risk for the lifetime of development. Detail on how development of these sites will remain safe is provided within planning policy, both in terms of the general approach to flooding in Strategic Policy PLP21: Flooding and with regard to suitable site specific requirements for Strategic Sites and Site Allocations. Further detail can be found within the sequential and exception test contained within the SFRA.

The Council has an agreed Statement of Common Ground with the Environment Agency. This provides details on the agreed approach towards allocating sites within areas risk of flooding, as set out within the sequential and exception test. It also sets out the agreement towards the Council's approach on flood risk when determining development proposals.

This option takes account of a range of other relevant constraints, including nature conservation and transport, where careful consideration is given to impacts and risks, and how they can be mitigated and managed, which informs policy requirements.

This option applies residential yields of the strategic sites and site allocations, and residential density ranges for all other sites in line with the policy approach set in the draft Local Plan (PLP21: Residential Density). It seeks to optimise the use of land as far as possible, taking account of the varying development potential within the City's diverse but confined area, in terms of local character and existing densities, public

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transport and access to a range of services and with regard to development viability and deliverability. This is supported by evidence contained within the Urban Characterisation Study, the Housing Density Background Paper (2021) and the Viability Study (2024).

Section 5 of this report details potential growth locations in the City and, alongside a number of other strategic sites, Tipner West and Horsea Island East is key to the draft Local Plan's development strategy. It seeks delivery of a marine employment hub alongside a new bridge and flood management measures. The housing element of the site, expected to deliver 814 to 1,250 new homes is enabling development, to achieve viability of marine employment hub while also making an important contribution to meeting housing needs in the City.

The draft Regulation 19 Local Plan gives consideration to responses to the Regulation 18 consultation, which presented three options for Tipner West and Horsea Island East: for an Innovative Sustainable Community, or super-peninsula, including 3,500 - 4,000 new homes and significant land reclamation; regeneration of the existing area; and to maintain the area in its current state ('do nothing'). The option for the super-peninsula received a high level of opposition and would have involved the reclamation of a considerable amount of land from Portsmouth Harbour, which is protected by multiple layers of nature conservation designations. The decision was made by Full Council in 2022 to abandon that scheme along with the do-nothing scenario for the site. The draft Regulation 19 allocation envisages a much reduced form of development and only allows a small amount of reclamation for the marine employment hub if it can be shown to be necessary for project viability or feasibility.

This option is assessed through the Habitats Regulations Assessment (HRA) supporting the Pre-Submission Local Plan. The objective of the HRA is to identify any aspects of the Local Plan that would cause Likely Significant Effects on, or adverse effects on the integrity of, internationally and nationally designated nature conservation sites. The HRA concluded that the Tipner West & Horsea Island East allocation will have adverse effects on the Portsmouth Harbour SPA / Ramsar site, because it will inevitably result in the loss of 0.2ha of inter-tidal protected habitats and (depending on the layout and quantum of development in any future planning application, and depending on evidence of viability and feasibility) may result in the loss of up to 0.5ha intertidal, 0.5ha subtidal, and 3.6ha terrestrial protected habitats. As a result, the policy can only be adopted if certain statutory derogation tests are met. Those tests require there to be: i) no feasible alternative solutions to the allocation; ii) imperative reasons of overriding public interest (IROPI) for the allocation to proceed; and iii) sufficient compensatory habitats available to ensure that there is no residual impact on the integrity on the Habitats sites. The HRA concluded that each of those tests was met. The preferred option provides the flood defences, land decontamination and new marine hub and seeks to minimise harm to the nature conservation designations.

The City Council have worked effectively and continuously with surrounding local authorities in the PfSH area with the intention of meeting unmet housing need under the Duty to Cooperate. The Fareham Local Plan, adopted in 2023 (for a plan period to 2037) identifies 800 new homes to address unmet housing need in Portsmouth. The Council has formally requested a contribution to meet this unmet need from remaining PfSH neighbours, and will continue to engage on this matter. It will set out

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the detail of this cooperation in a series of Statement of Common Grounds with each local authority.

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

Taking account of the above consideration of how this approach meets sustainability objectives and the findings of the comprehensive evidence base, Option H3 is the most sustainable approach compared to the reasonable alternatives.

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

The following options are less favourable alternatives, and it is not recommended that they are taken forward in the Local Plan:

Option H1: Develop all deliverable and suitable HELAA sites within Flood Risk Zone (FRZ) 1 (This option will fall significantly short of meeting housing needs).

Option H2: Maximise housing delivery (where possible) on all deliverable and suitable HELAA Sites within FRZ1 (NB, this option is still considered to fall significantly short of meeting housing needs).

Options H1 and H2 are not taken forward as they are expected to fall significantly short of meeting housing need. They also have notably fewer (two out of ten, as opposed to the preferred option's six out of ten) positive significant effects on sustainability objectives. They result in the same number of negative significant effects as the preferred approach. These two options also do not account for the potential role that mitigation and management of risks and impacts that the Council's evidence base provides, which can enable development, as detailed under the preferred approach.

Option H2 would be at odds with the approach to residential density established in the Urban Characterisation Study and the Housing Density Background Paper (2021) and could lead to an intensity of development on sites within Flood Zone 1 that could bring potential negative impacts to local character, housing standards, and a higher level of demand on local services (e.g. healthcare and schools) and amenities. This would not be considered to fit with the plan's six strategic objectives.

Accounting for the above, these two options are less sustainable when considered against the preferred approach and other reasonable alternatives (Option H4, detailed below) and are not taken forward.

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

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The majority of the factors considered in Option H3, the preferred approach, also apply to this option, but this one has the potential to deliver a higher number of new homes than that generated by the preferred approach. A number of sites, as outlined in section 5 of this report, would see an uplift in density and housing numbers. It is considered that this would be at odds with the approach to residential density established in the Urban Characterisation Study and the Housing Density Background Paper (2021). It could lead to an intensity of Development coming forward in locations across the city that leads to potential adverse impacts on local character, housing standards, historic environment and a higher level of demand on local services (e.g. healthcare and schools) and amenities than the preferred approach. This would have potential to undermine the plan's six strategic objectives.

The balance of positively and negative effects on sustainability objectives is very similar to the preferred approach, but based on the consideration of the above evidence, Option H4 is considered a less favourable option when compared against the preferred approach.

Employment Growth Options

Office development

The Council's **preferred approach is Option OF1: An additional 42,500 sqm of office space focused at Lakeside Business Park. (HEDNA lower end estimate of need)**

This follows evidence from the Council's HEDNA, which analyses demand for new office floorspace against different labour demand scenarios. Taking account of the shift to home and hybrid working following the Covid-19 pandemic, reduced levels of employment growth, replacement demand for office development and the trend towards 'flight to quality' where business occupiers and investors seek high-quality modern office space, the HEDNA's preferred alternative labour demand scenario leads to a recommendation for a requirement of around 42,500 sqm of office space. This will be largely delivered through Lakeside Strategic site, alongside smaller net gains through redevelopment of floorspace in the City Centre.

Significant positive effects are created by this option in relation to four SA Objectives on economy, town centres, housing and healthy communities. Employment growth and office occupancy is expected to support increased footfall and expenditure in City's town centres, development opportunities for housing (and jobs for new residents) and increased employment levels leading to better quality of life and health outcomes. However it should be noted that these significant benefits are also evident for the two reasonable alternatives for office development, as listed below.

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

The following options are less favourable alternatives, and it is not recommended that they are taken forward in the Local Plan:

Option OF2: An additional 61,700 sqm of office space focused at Lakeside Business Park and the City Centre. (HEDNA top end estimate of need)

Option OF3: An additional 74,217 sqm of office space in the city within the city centre and at Lakeside Business Park (PfSH estimate of need)

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Based on the HEDNA, these two options are not considered to be appropriate as a basis for establishing need for office floorspace.

The HEDNA states that at present there is little demand for office floorspace as shown by the net absorption rate and through discussions with local agents, although these do point to the need for smaller spaces in the City Centre over time, but less certainty regarding larger corporate space. Furthermore, it is important to note that overall, typically office based sectors, such as banking and accountancy, have lower representation in the City in comparison to advanced manufacturing.

Industrial/ warehousing development

The Council's preferred approach is **Option IF5: An additional 96,300 sqm of industrial/ warehousing floorspace targeted at Tipner West and Horsea Island East, Land west of Portsdown Technology Park, and regeneration/ intensification at existing industrial employment sites (HEDNA top-end estimate of need).**

This option is based on the recommendation of HEDNA's preferred alternative labour demand scenario, which shows 96,300 sq.m should be used for estimating future requirements of manufacturing and warehousing. This preferred option is considered appropriate in light of any need to test economic-led housing need.

This will be delivered at strategic sites, site allocations and through completion of extant permissions. There is also opportunity for intensification and making better use of land in existing industrial areas. The Council's HELAA and the Approach to Employment Land Study by BE Group also highlight intensification opportunities on existing industrial/ warehousing sites for further development, which may come forward during the plan period as windfall development.

Significant positive effects are created by this option in relation to four SA Objectives on economy, town centres, housing and healthy communities.

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

The following options are less favourable alternatives, and it is not recommended that they are taken forward in the Local Plan:

Option IF4: A net loss of industrial/ warehousing space (-42,800sqm). It is assumed this would be achieved through proposed changes of use at (some) existing industrial employment sites. (HEDNA lower-end estimate of need).

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

The HEDNA states that overall the labour demand (alternative) and net completions ranges are considered to be more appropriate whilst still planning positively for growth. These show a range from around 75,500 sq.m to 96,300 sq.m) and the preferred option is at the upper end of this range.

It is clear that a net loss of industrial/warehousing premises in the City would not have a positive effect on the economy of the City. Manufacturing including the

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maritime and engineering employment sectors related to naval activity and research would not benefit from a net reduction in floorspace.

Equally the provision of a quantum of floorspace that is substantially above need could flood the market and thus not deliver tangible benefits to the economy of the City.

Houses in Multiple Occupation (HMOs)

The Council's preferred option is **Option HMO4: 10% limit within the 50m radius of the application site.**

The Council has for several years sought a balanced approach to the management of HMOs in an effort to create mixed and balanced communities and to ensure that HMOs, with associated social, environmental and amenity impacts, are not heavily concentrated in a given area. The Council's 2019 Supplementary Planning Document on HMOs identifies that "a community will be considered imbalanced where more than 10% of residential properties within a 50m radius of the area surrounding the application property are already in HMO use". This seeks to ensure a mix of housing types and sizes, to meet a range of local housing needs. This threshold has been used successfully in Portsmouth for over five years and is also used by two thirds of local authorities across the country that control HMO proliferation.

It is also important to recognise the role that HMOs play in meeting an element of affordable housing supply, as highlighted in the Council's HEDNA. The preferred approach (Option HMO4) is considered to allow this tenure of housing reasonable scope to meet that need while maintaining balanced communities.

Option HMO6 and to a lesser extent HMO5, while having greater potential to meet an element of need for affordable housing and bring potential for minor positive benefits for economy and town centres sustainability objectives, could lead to a minor negative effects, as highlighted in section 6. These communities would be considered imbalanced, with greater potential for negative social, environmental and amenity impacts on local communities, which would be focused in areas that already have high concentrations of HMOs (Southsea, St Thomas and St Jude). This policy option is not considered an appropriate way forward when considered against the appraised alternatives and is not taken forward the in draft Local Plan.

The assessment in section 6 also shows that applying HMO1 at 0% (no additional HMO development) or a more stringent cap (HMO2 and HMO3 at a 5% limit with 50m or 100m radius of the application site) could lead to minor negative effects by restricting opportunities to meet additional need for HMOs over the plan period. It should be noted that application of such a policy would not be expected to prevent demand for HMOs, even with policy compliant delivery of affordable housing (due to the level of need for affordable housing set out in HEDNA) and would simply shift demand for this development elsewhere. A lower limit option (HMO1, HMO2 and HMO3) could essentially cap new HMO development in areas where they are already concentrated (above the 5% limit) and would be likely to lead to a dispersal of HMO development to nearby areas, where concentrations are currently lower. This could lead to (minor) negative effects arising more widely across the City, with any benefits being seen in areas with already high concentrations of HMOs, where any further concentration would be halted.

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

First Homes

The Council's preferred approach is **Option FH1: 0% of affordable housing contributions in development proposals are delivered as part of the First Homes scheme.**

This is because there is no evidenced requirement for First Homes in Portsmouth, as part of delivery of affordable housing. Shared ownership is an important and proven route to affordable home ownership due to the lower deposit needed to secure a property compared to First Homes. The Council's HEDNA shows only a small gap in the incomes needed to buy or rent a home in the City, and therefore very little need for First Homes.

Shared ownership is considered to offer a genuinely affordable alternative to market homes which carries greater benefits to people in Portsmouth.

Evidence in the HEDNA and Local Plan Viability Study show there are viability issues in delivering either the Government's recommended threshold of 25% (Option FH3), or a lower level of 10% (Option FH2) of affordable homes as first homes. This carries the risk of detrimentally impacting the delivery of other affordable tenures that the Council deem as priorities, specifically affordable and/or social rent and Shared Ownership. It could leave the Council at risk of having reduced numbers or no affordable homes provided through development, for viability reasons. For this reason, Option FH2 and Option FH3 are not taken forward in the draft Local Plan.

In terms of appraisal against sustainability objectives, all options were neutral (had no significant) effects. The options form a percentage of the affordable housing requirement from development, and development location remains the same. The sustainability objectives most likely to be affected by the different options are housing, healthy communities and the economy, where the preferred approach (Option FH1) has minor positive effects, and lead to it being ranked first under these three objectives. For the reasons outlined above, Option FH1 with its target of 0% First Homes as part of affordable housing provision is considered best suited to meet local housing needs in the City, while ensuring that the draft Plan's wider approach to affordable housing delivery is viable and deliverable.

Biodiversity Net Gain (BNG)

The Council's preferred approach requires 10% BNG on all developments, with the exception of three predominantly Council owned sites (Portsmouth City Centre North, Somers Orchard and Lakeside) where 20% is required. This is considered to strike a balance between meeting the national BNG requirement (10%) while supporting the Council's aspiration to exceed the minimum requirement on key Council owned sites. It offers a pragmatic solution which will help deliver measurable improvements to biodiversity while remaining achievable and viable.

The City Council is also pursuing the delivery of offsite BNG on City Council owned land in order to maximise the benefits of BNG delivery in the City.

Both options below achieve positive significant effects for sustainability objectives on climate change, flooding and coastal change, and natural environment. While minor

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positive effects support higher ranking for Option BNG2, adverse impacts on viability (noted below under Option BNG2) and therefore the deliverability of planned development mean that a 10% net gain on all development, with the exception of the three predominantly Council owned sites named above, is considered the appropriate as the preferred approach.

As discussed the preferred approach falls between the two alternative options, which are appraised separately below.

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

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

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

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

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3. SA findings at this stage

Introduction

Part 2 of the SA Report presents an appraisal of the draft plan, as to be published under Regulation 19 of the Planning Regulations. A series of narratives are presented under each of the ten SA objectives, providing a commentary on the spatial strategy, city-wide policy provisions, cumulative effects, and overall conclusions (relevant to each SA theme – i.e., there is no systematic consideration of each individual policy, instead policies are drawn upon as relevant to the SA objective in question).

Methodology

The appraisal identifies and evaluates ‘likely significant effects’ of the plan on the baseline, drawing on the ten SA objectives identified through scoping as a methodological framework.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Local Plan in more general terms.

Finally, it is important to note that effects are predicted taking account of the effect characteristics and ‘significance criteria’ presented within Schedules 1 and 2 of the SEA Regulations.⁸ So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects.

⁸ Environmental Assessment of Plans and Programmes Regulations 2004

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Summary appraisal findings

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

SA objective	Plan appraisal conclusion
SA-1: Building a strong, competitive economy in Portsmouth	The spatial strategy and policy provisions of the draft plan are considered for their potential to support the strategic objectives of the Plan to enable a strong and diverse economy that raises the quality of life and access to education and training opportunities for all. Overall significant positive effects are considered likely as a result.
SA-2: Ensuring the vitality of the City Centre and other town centres in Portsmouth	The detailed guidance and support provided for Portsmouth's centres, including growth at key locations, are considered to provide significant support for long-term vitality. As a result, significant positive effects are anticipated overall.
SA-3: Promoting sustainable transport in Portsmouth	Overall, the Plan seeks to deliver new infrastructure improvements and prioritises sustainable transport access, particularly active travel, in direct support of the strategy objectives for a healthy and happy city, a green city and a city with easy travel. The Plan also requires development to mitigate its impact on the strategic and local road network. As a relatively compact and accessible city, long-term minor positive effects are considered likely overall.
SA-4: To tackle climate change, flooding, and coastal change in Portsmouth	The strategic growth locations can support a good mix of uses within the city and lead to economies of scale to the benefit of climate resilience. Particularly by enabling the delivery of new or upgraded transport infrastructure, low carbon heat and power, flood resilience measures, and community infrastructure and open spaces, and positive effects are anticipated in this respect. Flood risk is a key constraint to growth in the city, and flood resilience in line with the proposed policy provisions will be key to ensuring that long-term adverse effects are avoided. However, as the plan strategy includes housing within high flood risk zones, minor negative effects are concluded.
SA-5: Delivering high-quality homes in Portsmouth	Overall, significant positive effects are concluded in relation to this objective, recognising that the Plan has put forward a viable housing strategy at this stage, though this will require continued monitoring and partnership working to ensure longer-term housing needs can be planned for.
SA-6: Promoting healthy communities	On balance, it is appropriate to conclude that the draft plan could lead to significant long-term positive

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SA objective**Plan appraisal conclusion**

	<p>effects in terms of promoting healthy communities within the city boundaries. Policies are coordinated to deliver positive health outcomes within the city, providing new homes, employment and community and transport infrastructure which prioritise healthy lifestyles, increase safety and reduce deprivation.</p>
<p>SA-7: Conserving and enhancing the historic townscape</p>	<p>Overall, the draft plan policies seek to ensure that development retains and enhances the significance of the historic environment and heritage assets and their settings (including designated and non-designated sites). Encouraging the retention of historic heritage buildings and their reuse is anticipated to lead to minor positive effects, contributing towards meeting objectives not only within heritage protection and accessibility, but also in the related area of urban design and achieving a strong competitive economy.</p> <p>Protection is also provided to ensure that development appropriately considers archaeology as a prominent historic asset within the city. The policies are likely to reduce the extent of the negative effects identified; however, the overall impact remains uncertain at this stage as it is ultimately dependent on-site level schemes demonstrating successful design, layout, and integration.</p>
<p>SA-8: Requiring good urban design in Portsmouth</p>	<p>The Plan seeks to secure good urban design through strategic regeneration of key city locations, delivering enhancements to public realm, accessibility, and the environmental quality of the area. Policy requirements seek to ensure development will support connectivity of active travel, green infrastructure and provide net gains in biodiversity, to deliver high quality urban living, working, and visiting environments. Whilst there remains an element of uncertainty in relation to potential growth outside of the city boundaries, within the city confines minor long-term positive effects are considered likely overall.</p>
<p>SA-9: Conserving and enhancing the natural environment in Portsmouth</p>	<p>In line with the findings of the HRA, at this stage the potential for significant negative effects in relation to this SA objective are identified, and it will be down to sufficient delivery of compensatory measures to reduce the extent of these effects. The benefits of the allocation and IROPI will ultimately be weighted by plan-makers against these likely impacts.</p>
<p>SA-10: Facilitating the sustainable use of natural resources in Portsmouth</p>	<p>The spatial strategy prioritises significant regeneration opportunities alongside the retention of key natural resources that support the ecosystems and green infrastructure network of the city. The spatial strategy</p>

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SA objective

Plan appraisal conclusion

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

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

The SA has made recommendations at each stage of SA that have been taken into consideration by PCC.

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4. Next steps

Introduction

Part 3 of the SA Report summarises the next steps plan-making and the SA.

Next steps

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

Monitoring

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

