

# Portsmouth Local Plan Issues and Opportunities Consultation Summary of Responses

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**November 2017**

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## **i. Introduction**

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The new Portsmouth Local Plan Issues and Options consultation was undertaken in August and September 2017. This document summarises the responses received. The responses are arranged into 28 chapters, covering the proposed Vision and Objectives, various themes, sites and broad areas, and the other documents, such as the Sustainability Appraisal and Habitats Regulations Assessment which accompanied the consultation.

The document focuses on the issues raised, and for that reason the respondents are not named. Where the identity of the respondent is particularly relevant to the issue being discussed, that organisation is named in bold. A full list of respondents is set out in the appendix to this document.

The document also sets out an initial officer response to the summary points. This is not the Council's final response to the subjects raised, but has been included here to help all parties understand how the work to be undertaken for the Local Plan will proceed.

# 1. Vision and Objectives

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120 comments received regarding this topic

**Question 1: Do you agree with the Vision and Objectives? If not, how should they be changed?**

## Vision

### A Vision for Portsmouth

**To make Portsmouth the premier waterfront city with an unrivalled maritime heritage - a great place to live, work and visit.**

Overall, 49 respondents agreed with proposed vision - as a suitably aspirational but realistic choice. However, 24 comments did not think the draft vision was suitable. Suggestions for changes were as follows:

- Vision must be innovative, forward thinking and long term - not just about updating the existing plan.
- Make the vision less ambiguous - some confusion around the use of 'waterfront cities' and 'premier'; or whether Portsmouth needs to be 'the' premier waterfront city - rather than one of them.
- Ensure the vision links to the objectives.
- Make it measurable - the vision and objectives have not been stuck with in the past.
- Include great place to 'study'.
- The vision is important for promoting investment but also needs to address community priorities such as open space and a public transport network.
- Include reference to the fact that Portsmouth is the only island city in the country - e.g. 'To make the only Island City in the UK - Portsmouth - a better and fairer place to live, work, and visit.'
- Vision and objectives should be looking to transition Portsmouth into an energy efficient, affordable place to live.

### Other comments:

- Recent development does not give the impression of 'premier waterfront city' - cites the student accommodation in Greetham Street.

### Initial Council Response:

Overall it is considered the broad support for the proposed vision reflects its status as a long-term goal of the city. The suggested amendments contain a number of reasonable points but it is considered many are more appropriately dealt with through consideration of specific issues or ways in which the Plan is prepared, for instance the inclusion of measurable targets so that progress can be monitored.

## Objectives

47 respondents supported the proposed Objectives. 24 did not agree with them. General comments included the following:

- Too vague and unlikely to be achieved. They could apply to any town and are not Portsmouth centric enough. Alternatively others felt the Plan could be more ambitious and courageous: "It feels like a plan from 30-40 years ago."
- Not all the issues and problems of the city are covered.
- Objectives seem to prioritise landowners above residents.
- Prioritise the objectives by urgency and include a timeline - consider how residents will know if the objectives have been achieved.
- Re-order and refocus to put greater emphasis on local communities and facilities. e.g. regeneration of current residential areas and better place making in new developments
- Reflect Portsmouth's sub regional role.
- Consider that growth is not mandatory.
- The document has too little focus on objectives 3-6, none on 7 and 8 and very little on Objective 2, so in its current form it is unbalanced and primarily focused on housing.
- Consistent funding is essential to achieve the Plan's objectives.

Comments were received on the individual objectives and their supporting text in the document:

### **Objective 1: To provide a range of housing in locations where people want to live**

- How is it assessed where people want to live? How will housing be accessible to all?
- Change to: 'To provide a range of housing in appropriate locations consistent with all the objectives set out in this plan' / or 'that meets residents' needs.
- Include 'accessibility and affordability' or 'affordable housing'. This ensures that the range of housing specifically responds to housing need in the city.
- **Sustrans** recommend the inclusion of 'mixed-use developments' and housing density (also applicable to Objective 8).
- Address the aging housing stock- during the plan period half the city's housing will be over a hundred years old.
- Add an additional objective: 'to support harmonious integration between students and the city residents, ensuring that planning regulations protect a balanced demography with appropriate services, environmental protection and HMOs that are appropriate to size of building and area.'

### **Objective 2: To develop a successful and diverse economy with employment opportunities for all**

Put this economy objective first as it drives the housing requirement

- Add 'with a focus on helping residents to progress beyond low skilled and low paid work'. This ensures that all Portsmouth residents can benefit from employment that fulfils their potential and provides a living wage.
- A greater focus on lifelong education.
- Be mindful of previous private investment which has left the city with ugly buildings.
- Gunwharf Quays is well placed to assist with Objectives 2, 3 (retail centres) and 5 (supporting infrastructure).

- Amend to: "to most cost effectively improve the quality of life of the Portsmouth stakeholders (i.e. the council tax payers)".
- Too much focus on the economy and not enough on making this a healthy and future proof place to live, work and visit.

### **Objective 3: To promote the viability and vitality of the City Centre, Southsea Town Centre and other smaller centres in the city**

- Railways Pension Fund acknowledges and supports Objective 3.
- The city centre aspirations should be combined with the economic objective (2).
- Include focus on supporting independent retailers.
- Include covered market expansion for the city centre with a diversity of stalls.
- The city centre and stations need improved cleaning.
- Focus on the regeneration of the north of the city.

### **Objective 4: To protect and enhance the historic character, arts and culture of Portsmouth**

- **The Theatres Trust** supports objective 4.
- **Historic England** welcome Objective 4, but state that "conserve" would be terminology more consistent with the NPPF than "protect".
- Needs to recognise that the protection of the city's heritage also benefits the quality of life for residents and provides an attractive location for businesses.
- The Plan should consider the location of hotel provision for quiet night's sleep - away from student routes.
- Include reference to the conservation and enhancement of heritage assets to contribute to a higher quality public realm.

### **Objective 5: To provide supporting infrastructure for Portsmouth's residents, businesses and visitors**

- **Education & Skills Funding Agency** supports Objectives 5 and 6.
- Too little emphasis placed on current inadequacies in infrastructure provision before adding additional - outdated sewers and drainage, public transport shortfalls, diminishing numbers of GPs, a lack of school places and traffic issues.
- Consider provision of public toilets.
- Expansion of park and ride.
- Tackle parking provision - allow city wide residents parking.
- Consider longer term infrastructure needs beyond the plan period.
- Add another objective: To restore ageing sea-defences to provide flood protection for next 100 years whilst enhancing the sea-front for residents and visitors.

### **Objective 6: To support the health and wellbeing of residents by providing access to health care, protecting/enhancing open spaces, providing sports and leisure opportunities, tackling air pollution and providing for biodiversity**

- This should be of primary importance as Objective 1.
- Support from **Sport England**, **Natural England** and **Education & Skills Funding Agency**.

- **Sustrans** welcome the inclusion of active travel in both Objective 6 and Objective 7.
- Add a dedicated objective to 'protect and enhance' the rich biodiversity of the city and its surrounds, protect ecology and biodiversity.
- **Natural England** suggests the objective is amended to: tackling air and water pollution and enhancing biodiversity.
- Aspire to increase the amount of trees.
- Add internationally recognised flora and fauna. **RSPB's** primary concern is that the objective provided recognition of the sites of nature conservation importance with the aim to protect and enhance these features as part of the Local Plan - including appropriate recognition to the internationally important designated intertidal habitats and the waders, waterfowl and terns these support within and adjacent to Portsmouth.
- Add 'reducing deprivation and inequality after 'access to health care, ' to ensure that these key wider determinants of health are considered.
- The **ESFA** recommends that education be referenced within Objective 6 and its supporting text, as the provision of high quality education facilities (including sports facilities) would help to meet this objective with regard to health and well-being and issues around social deprivation.
- Recognise that the locations of parks are not always conducive to safe exercise.
- Proposals to build on existing open space are contrary to this Objective (e.g. the St James Hospital site).

### **Objective 7: To make Portsmouth accessible with a range of sustainable and integrated travel options**

- Add safety considerations, especially in relation to cycling.
- Greater promotion of sustainable transport and their infrastructure improvements.
- Amend to: 'To make Portsmouth well connected and accessible with a range of sustainable and integrated travel options.'
- Add reference to electric vehicles.

### **Objective 8: To provide an attractive, sustainable and safe city**

- The issue of tall buildings attracted some comments - they should either be removed from the vision for the city for their poor amenity; aim for higher quality with linked open space provision, or just amend to 'taller' buildings.
- A greater focus on a safer community is needed with respect for each other and the city.
- The Council should enhance this objective by being an energy supplier.
- Add an additional objective: 'To ensure that local planning regulations effectively protect the local environment and amenities.'

### **Other comments:**

- The council could employ local staff directly to vastly increase Local Authority property building.
- Greater guidance needs to be given in the design of windows
- Tree planting is required in Velder Avenue and clean-up properties there and on Eastney Road approach to St George's and the beach.
- Southsea must retain Knight and Lee

- Compulsory purchase for Local Authority housing in North End and Stamshaw; areas in need of development.
- Car free celebration days
- Why are some areas seen as issues and others as opportunities?

**Initial Council Response:**

The general comments and specific suggested amendments highlight the balance to be struck between the various issues to be considered by the Council in the production of this new Local Plan. Further work will be undertaken to consider the appropriateness of some suggestions and approaches, including whether the proposals warrant recognition in the Objectives.

# Key Planning Issues and Strategic Options for Growth

## 2. Housing

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161 comments received regarding this topic.

### Do you agree with the description of housing issues? What other issues are there to consider?

24 respondents including the **Portsmouth Liberal Democrat Group**, the **Portsmouth Society**, and the **Portsmouth Fabian Society** noted their agreement with the description of housing issues set out in paragraphs 4.2 to 4.14

7 respondents noted that they do not agree with the description of housing issues set out in paragraphs 4.2 to 4.14.

### Housing Numbers

A number of responses suggested that additional information is required to inform the projection of housing numbers and population growth:

- Evidence that the projected levels are likely to be achieved.
- Consideration of the impact of Brexit.
- Different sources quote different figures; what is the actual number?

**PDPLA** suggest a flaw in the projection for new dwellings. Growth has been extrapolated between 2000 and 2010 but doesn't identify that much of this growth is due to student numbers that have now peaked. Suggest revisiting the PUSH analysis to get the correct number of houses and associated investment from central government.

**House Builders Federation** agree with the use of the 2012 sub-national population projections as a starting point for calculating OAN. The increasing and high levels of overcrowding suggest uplift in housing supply is required. This would be more in line with the Government's recent consultation on the standard methodology for housing needs which indicates Portsmouth's OAN as being 840 dwellings per annum (dpa).

**Winchester City Council** supports PCCs commitment to provide at least the level of housing proposed in the PUSH position statement. Suggest that increasing housing supply to more closely meet the OAN is more of a priority than meeting the PUSH employment target in full.

Several responses suggested that the projected housing figures were too high for the following reasons:

- The city is already very densely populated; when will we be considered at capacity?
- There is a need to protect open spaces, the seafront and natural environment rather than build additional homes.
- Existing infrastructure cannot cope, let alone with additional houses.
- The city is at risk of flooding; irresponsible to build more houses at risk of flooding.
- The island nature of the city means there is physically no more room.

- The existing high population density brings issues of congestion, deprivation, ill health and social unrest. Accepting more housing would impact further on these issues.

It has been suggested that PCC should work with partners to commission independent evidence to challenge the housing targets from PUSH and central government; perhaps aim for an exemption from the targets.

A number of responses made suggests about how the housing need could be met:

- The Council should make an agreement with neighbouring councils to spread the load, particularly in relation to availability of suitable land.
- House Builders Federation suggests that there needs to be clear justification to explain why housing needs across the PUSH authorities are not being met. Consider working on a joint Local Plan with Gosport and Havant.

### **Initial Council Response:**

The issues of housing need, housing targets and the interaction with other nearby authorities will need constant reassessment throughout the plan process. Towards the end of the Local Plan consultation the Government published a consultation paper "*Planning for the right homes in the right places: consultation proposals*" which included a number of proposals which, if implemented would have implications for the new Local Plan.

The responses made in this consultation, along with the outcomes of the government's consultation and changes to the National Planning Policy Framework (NPPF) which the Government has said will take place in Spring 2018, will inform the ongoing technical work and ultimately the draft Plan. For now, it is considered the relevant evidence on housing need available at this time for ongoing testing through the plan process are the estimates of need and capacity published in the PUSH Planning statement of 740 and 633 dwellings per annum, and the 835 dwellings per annum figure resulting from the Government's proposed standard methodology. Comments regarding the suitability of the method for calculating housing need will be considered further as part of that process.

### **Housing Location**

A number of responses made suggestions regarding the location of housing:

- Affordable housing need could be met by reclaiming land from the sea.
- New housing should be built on genuine brownfield sites with green space and community facilities being protected.

Respondents also commented on a number of specific sites:

- Commercial Road should be designated for housing instead of retail.
- Redevelopment of the MOD site at Eastney should be supported to help meet housing need.
- Sites outside of the city could be used to provide lower density housing.
- Milton's green spaces should not be designated for housing; open space is important for health and wellbeing.
- Housing development at St James Hospital should not extend beyond the existing built footprint.
- Milton and Southsea seafront should be reserved for low density housing.

### **Initial Council Response:**

The location of new housing will be considered further through the detailed consideration of each potential site. It is important, given the available evidence of high housing need, that the council considers the merits of all sites which could potentially deliver housing.

### **Housing Mix**

Several responses discussed the types of houses that are needed in the city:

- One bedrooms for couples and singles
- More social housing
- Older peoples' sheltered accommodation
- Taller buildings
- Options for the homeless, including shelters
- Plots of land for self-builders and local developers
- Reduction in student housing and poor quality buy-to-let as this is crowding out other provision.

**Portsmouth & District Private Landlords' Association (PDPLA)** suggest there is a need for more quality shared accommodation to meet the needs of the transient workforce and those on low incomes. This would also free up other properties for families.

**Portsmouth's Tackling Poverty Strategy Steering Group** suggested consideration be given to the need for specialist housing e.g. for those with disabilities, the homeless and service families.

**The Portsmouth Fabian Society** queried whether current and housing need for refugees/ asylum seekers has been considered.

Respondents also made suggestions regarding mix of tenures required:

- Suggest zoning of areas to prevent imbalance of rental/ owner occupied properties.
- More rental stock required for both private and Council tenants so that overall prices reduce.

**The National Landlords Association** noted that there is a need for housing of all tenures given the added pressure from the change in the welfare system and a shortage of housing leading to increased rents.

Suggestions were also made regarding areas of further research:

- The impact of multiple occupancy dwellings, including HMOs, student accommodation and care homes, on housing need.
- Understanding the drivers of the private rented sector and the people who use this housing.
- Research into the links between population density, deprivation and low educational attainment.
- Some respondents also commented on the need to protect or enforce housing types and use:
  - Protect family housing with local amenities such as parks so that families can still live in the city.
  - Self-build housing should be tightly controlled.

- Student Accommodation.

The majority of responses regarding student accommodation criticised the level of supply:

- Questioning the continued provision of student halls. Concern that this will lead to oversupply if student numbers fall.
- Suggest that permission of student halls should be linked to number of HMOs as many students prefer to live in HMOs.

A number of respondents queried whether any oversupply could be converted to affordable housing or housing for the homeless.

Many of the respondents also commented on the suggestion that student accommodation will release family homes, querying how this will happen and whether it will happen at all.

A number of responses focused on the location of student accommodation:

- There is too much student accommodation on prime sites that could have been used to provide affordable housing for key workers.
- Student flats should be located on a specific campus to reduce number of student halls and HMOs in residential areas.
- Comments also discussed the impact that the student population and meeting their housing need has on the city.
- Suggest a limit on student numbers as this is putting a pressure on housing supply and the local economy as students are economically inactive.
- There should be a mechanism to make students pay council tax or contribute towards the city in another way such as labour.
- Priority for building accommodation should be given to residents and not students.
- Student housing should not be exempt from providing affordable housing.

**Portsmouth Labour Housing Forum** suggests there is some indication that purpose built student accommodation is putting upward pressure on rents in the private sector.

Respondents also suggested that there should be more restrictions in the student housing sector:

- Suggest restrictions on people owning multiple properties that are rented out to students.
- The design standards and quality of student halls should be under closer scrutiny.

**The University of Portsmouth** suggest the Student Accommodation SPD and model S106 Obligation should be updated to reflect how student accommodation will be secured and maintained for the University including levels of rent set. The University would welcome the opportunity to input into the research on affordability and to review approaches with the Council.

**The Portsmouth Liberal Democrat Group**, and others, suggested that there should evidence based approach to student accommodation to ensure the mixed and balanced communities.

**The Portsmouth Labour Housing Forum** suggest a certain percentage of rooms in new halls being allocated to local young people who have become homeless but wish to continue their studies.

### **Initial Council Response:**

It is considered important, particularly in a constrained city such as Portsmouth, that the Local Plan has a strong evidence base on current housing issues. The *Housing Targets and Housing Needs* Background Paper outlined the need for additional research into the various components of housing need in the city and the suggestions made here will all be considered for inclusion in the scope of that research.

Student housing is a key concern. There are limits to what controls the planning system has in this regard, but the Council has undertaken further investigation into student housing issues, through the *Student Housing and Housing Targets* Background Paper and the separate identification and monitoring of student housing in the yearly Authority Monitoring Reports to better inform the approach in the new Local Plan. This will be considered further as the Plan progresses.

### **Houses in Multiple Occupation**

Many of the responses regarding Houses in Multiple Occupation (HMOs), including those received from the **Friends of Old Portsmouth Association**, raised concerns about the current levels of provision being too high and the perceived issues associated with this:

- They provide sub-standard accommodation
- They attract transient communities
- Their numbers are increasing, seemingly unchecked
- Some respondents made suggestions regarding how HMO provision can be better regulated:
  - Restrict licences to 5 to 10 years so densities can be reduced over time and converted to family homes.
  - Introduce standards of maintenance and inspection so HMOs don't detract from the quality of a street.
  - Current licensed HMOs should be regulated by PDPLA.
  - Establish compliance checks for rubbish, noise etc.

**PDPLA** suggest that the Councillors, supported by local residents, have a NIMBY (Not In My Back Yard) approach to shared housing, using the excuse of striving for balanced communities.

### **Initial Council Response:**

The current Local Plan aims to restrict concentrations of new HMOs. This approach will be revisited as part of the new Local Plan to ensure it remains the correct one. However, it is worth noting that many new HMOs have been granted permission under the current policy.

### **Housing Quality**

A number of comments suggested that all housing, whether social or market, owner-occupied or rented housing should be built to high quality standards, including:

- Being warm, well insulated and safe from fire
- Being accessible and dementia friendly
- Built sustainably with high standards of energy efficiency
- Having high standards of amenity, including in areas of high density.

Several respondents, including the **Portsmouth Cycle Forum**, noted that there is insufficient high quality housing stock in the city. There is a lot of old, low quality stock that could be selectively replaced to meet modern standards.

A number of comments received discussed the perceived poor quality of rental housing stock. It was suggested that landlords should be held to account for the quality of accommodation and rent levels charged.

Housing density was also seen as an important issue:

**Portsmouth's Tackling Poverty Strategy Steering Group** suggested keeping higher density housing to areas of high sustainability/ accessibility, but only in areas where density is currently less than other areas of the city to avoid issues of deprivation.

The **RSPB** suggested that higher densities could reduce the land take up and impact on SPAs and their supporting habitats.

#### **Initial Council Response:**

The preference for new housing to be built to the highest standards is understood. The standards of new-build housing will be regulated by the relevant Building Regulations and other appropriate mechanisms. The approach taken by the Local Plan, including any requirement for homes to meet enhanced standards will be considered alongside evidence on the viability of development and other relevant factors.

### **Housing Affordability**

Many agreed that affordable housing is a priority and made the following suggestions for addressing the need:

- Create an affordable housing SPD.
- Sell houses previously let to students to first time buyers.
- Developers need to include allocation of affordable housing within every development.
- Focus on delivering affordable family homes rather than luxury apartments.
- Use existing terraced housing stock to meet affordable need rather than renting these houses to students.
- Consideration of alternative build models e.g. kit homes.
- More council housing kept for rental.
- Stop relying on private developers to supply 'affordable' housing.
- Introduce council run building projects on break-even basis.
- Consider innovative ways of meeting urgent homeless need e.g. shipping containers.
- Reduce level of under occupancy of family homes by older people.

**The Portsmouth Liberal Democrat Group**, and others, suggested that viability assessments should be available for planning committee and the public to view and student housing should contribute towards affordable housing.

**Portsmouth's Tackling Poverty Strategy Steering Group** states that the Council should use its powers to ensure that no homes are left empty.

**Rentplus** noted that they agreed with the issues but that there should be more information about the scale and types of affordable housing need.

Respondents suggested that the following issues have added to the pressures on affordable housing:

- Artificially inflated house prices
- Greedy landlords in the buy to rent sector
- Right to Buy depleting the Council's rental stock
- Welfare reforms will exasperate the need for affordable housing and increase levels of homelessness.

**Portsmouth's Tackling Poverty Strategy Steering Group** suggest that measures of affordability should be modelled to show future trends and affordable housing needs to 2036.

**The Portsmouth Labour Housing Forum** submitted their Plan for Affordable Housing, supported by a petition signed by 163 individuals, which puts forward the following proposals:

- Refocus the Council's property investment strategy away from commercial property and towards the development of local affordable housing.
- Put pressure on the Council to thoroughly investigate the feasibility of using its arm's length property company to take a lead on development (with a focus on affordable housing) at each of the strategic sites identified in the Issues and Options Consultation paper.
- Any Council-led development should seek to secure the maximum possible affordable housing on the site. Under no circumstances should the level of affordable housing be below that required of a market development.
- Publish viability assessments in cases where the developer proposes to provide less affordable housing than required by local planning policy.
- Where a developer proposes to provide less affordable housing, instruct the District Valuer to conduct an independent viability assessment.
- Retain specific requirements for the provision of affordable housing on market developments.
- Require developers of new purpose built student accommodation to contribute towards the provision of affordable housing in line with other types of development.

#### **Initial Council Response:**

The Council's current policies on delivering new affordable housing are summarised in *Providing affordable housing in Portsmouth: A summary of affordable housing policies for developers*. The Council does deliver new affordable housing itself and works with other organisations to bring forward affordable housing. The production of a new Plan provides the Council and its partners with an opportunity to consider its priorities as a Housing Authority and the focus for housing delivery. The proposed further research on housing need will include affordable housing needs. The Government's Housing White paper, and subsequent document *Planning for the right homes in the right places: consultation proposals* indicate that the Government is considering amending national requirements regarding the process for preparing, and the publication and availability of viability assessments to inform planning decisions, particularly where the delivery of affordable housing is proposed to be lower than that required by policy. The outcomes of this are expected in spring 2018 and will inform the next stage of the new Local Plan.

## Infrastructure to Support Housing

Many respondents, including the **Portsmouth Liberal Democrat Group** and the **Milton Neighbourhood Forum**, commented that existing infrastructure is not sufficient to meet the needs of the current population and additional homes should not be built until improvements are made to:

- Health facilities
- Air quality
- Roads
- Education provision
- Drainage/ Flood risk
- The sewerage system
- Open space provision
- Electric vehicle charging infrastructure
- Space to accommodate sustainable modes of transport

The Council's approach to securing funding to support such infrastructure improvements was also seen as important.

A number of respondents, including **Sustrans** and **Northwood Investments International Ltd**, noted that mixed-use development and proximity to amenities and a range of transport options is essential to reduce the need to travel/ ease congestion, to encourage community cohesion and stimulate a vibrant environment.

### Initial Council Response:

Concerns over the capacity of infrastructure to meet current needs and the anticipated needs of future development are understood. These are both site specific and city-wide. Part of the process of considering a Plan is to identify constraints to development and to see if they can be overcome. The plan will be informed by an Infrastructure Delivery Plan which will identify the infrastructure required to support any new development, the timing of when it is required, the organisation(s) responsible for its delivery and the available funding.

### What housing options do you think the Council should follow in the new local Plan? Are there any other options we should be considering?

#### Affordable Dwelling Options

##### Affordable Dwelling Options:

- **AH1a.** Seek affordable housing on sites of 10 or more dwellings.
- **AH1b.** Seek the proportion and types of affordable housing in each development depending on housing need and viability.

Some support for Option AH1a:

- **Paulsgrove Residents Association** notes that the Council should 'require' affordable housing, not 'seek' affordable housing.
- Consideration should be given to housing mix with this option.

**Portsmouth Labour Group Housing Forum**, and others, do not support Option AH1b as it was suggested this would be unacceptable as it would encourage more developers to negotiate down their housing obligations.

**PDPLA** noted they are not in support of AH1a or AH1b. Suggested that any policy should:

- Be consistent to apply to all developments.
- Not allow student halls to be exempt.
- Developers should not have the option of removing the affordable element when 'not viable'.

Suggested that PCC will need to take a less onerous approach to affordable housing to ensure developers remain interested in proceeding.

**Rentplus** supported some aspects of options AH1a and AH1b:

- Affordable housing should be sought wherever possible, for all schemes that can viably support its delivery.
- Requiring all applications to demonstrate and negotiate on viability would be impractical and unreasonable for all parties concerned.
- The Local Plan should set an appropriate threshold below which no affordable housing will be sought; with clear reference to meeting local housing needs- the Council should be ambitious and consistent in this approach.

**Rentplus** recommend that affordable housing policies be informed by an up-to-date viability assessment that utilises the full range of affordable housing tenures set out in the Housing White Paper including rent to buy.

### **Initial Council Response:**

The responses highlight the need for the Council to refresh its evidence on housing need and development viability. Both are proposed to be undertaken before the Plan is finalised. It is also important that any changes in the NPPF or Planning Guidance are reflected in the Council's approach. Specific points, including the potential for student housing schemes to contribute towards affordable housing will be addressed through that technical work.

### **Accommodation to Meet Specific Needs Options**

#### **Accommodation to Meet Specific Needs Options:**

- **SH1a.** Require strategic development sites to include a range of housing including starter homes, self-build, housing for older people and supported housing.
- **SH1b.** Allocate individual smaller sites for specific housing needs.
- **SH1c.** A criteria based policy for meeting specific housing needs.

There was general support for policies that would meet specific needs. However, SH1a was the most popular option, with the following points made:

- This option will help lead to mixed communities.
- It is important that a range of needs, not just starter homes are met.

Responses were also received in support of SH1b, noting that:

- Smaller sites are important for meeting specific need as well as strategic sites.

- PDPLA note this option is more likely to meet local need than passing large sites to national developers.

**Rentplus** noted their support for a mixture of the three options. PCC should include criteria based policy along with the two other Options (SH1a and SH1b) to enable further sites to come forward that meets the needs not met through allocations. A combination of the options is recommended in line with Government's intentions to widen the definition of affordable housing.

#### **Initial Council Response:**

The broad preference for strategic sites to include a range of housing types is noted but the potential for individual sites to be allocated for specific needs will be investigated.

### **Sites for Travelling Communities Options**

#### **Sites for Travelling Communities Options:**

- **TC1a.** Allocate a specific site where a need is identified.
- **TC1b.** Include a criteria based policy in the Local Plan.

Few respondents provided comments on travelling communities Options. One respondent supported Option TC1a and another supported both Options. Two respondents suggested that sites for travelling communities were not needed in Portsmouth and one queried whether there is a requirement to meet the needs of this group.

#### **Initial Council Response:**

Although this issue did not raise many responses there is a requirement in the NPPF that it is read in conjunction with the Government's planning policy for traveller sites. This issue needs further consideration to understand if the criteria-based approach in the adopted core strategy (Policy PCS22) remains the correct one.

### **Houses in Multiple Occupation Options**

#### **Houses in Multiple Occupation (HMOs) Options:**

- **HMO1a.** Continue the approach of restricting houses in multiple occupation.
- **HMO1b.** Remove restrictions to houses in multiple occupation to maximise accommodation in the city.
- **HMO1c.** Increase restrictions on new HMOs in all or parts of the city.

There was some support for Option HMO1a to continue the existing approach.

A number of respondents, including **PDPLA** supported option HMO1b because:

- It will maximise accommodation in the city
- It could lead to reduced rents
- The current approach of demonising HMOs restricts the city's ability to adapt and grow

One respondent supported Option HMO1c and the extension of restrictions across all parts of the city. There was also support for option HMO1c for the following reasons:

- This should help reduce their number, but they should not be discouraged completely
- There is less need for them due to increased number of student halls.

Two responses did not support any of the HMO options and instead suggested:

- Increased restrictions on allowing HMOs in smaller homes will be used as a money making exercise to increase rents.
- Instead suggest provision of HMOs for low income single person households in areas that are not targeted for student housing.

#### **Initial Council Response:**

The support for option HMO1a, and the concerns over HMOs which arose in response to a number of questions in this consultation, are noted. The Council has already undertaken to prepare further evidence on the various elements of the housing market to inform the need for various types of housing and specialist housing. That evidence will inform a balanced decision on the right approach to HMOs which recognises the role they play in providing accommodation, and the need to maintain balanced communities.

### **Student Accommodation Option**

#### **Student Accommodation Option:**

- **SU1a.** Continue the current monitored but unrestricted approach to the quantity of student accommodation.

Many respondents did not support Option SU1a and suggested that the current unrestricted approach should not be continued as we may already have too many student halls if student numbers fall.

A number of respondents suggested improvements and alternatives to Option SU1a:

- New student halls should not be exempt from supplying a proportion of affordable housing.
- Student accommodation to be encouraged around the University's city centre campus.
- Only allow development of student accommodation where the Council is satisfied that it will reduce the demand for family sized accommodation in the city.
- Consider restricting the quantity of student accommodation to University enrolment numbers so that no new blocks are built if sufficient demand cannot be demonstrated.
- **PDPLA** acknowledged that not all students want to, or can afford to live in student halls. Suggest monitoring and managing student developments in line with needs, or ensuring that any student accommodation can be used for other tenant groups should student numbers change.

**University of Portsmouth** object to the current 'monitored but unrestricted' approach to the quantity of student accommodation being continued. There is strong justification for early review of the Student Accommodation SPD and an up-to-date stronger student accommodation policy in the new Local Plan.

The University has objected to a number of planning applications since 2016 due to concerns about: accommodation suitability and adequacy of developer led schemes; the location of the schemes in relation to the Campus; the size and configuration of proposed accommodation; inadequate management arrangements impacting on student welfare.

The University's requirement for supply of student halls has now been met and there is no requirement to plan for increased accommodation beyond the University's own estate.

Concerned that the unmanaged approach will lead to:

- poorly designed student accommodation situated in inappropriate locations which are not accessible to campus;
- inappropriately managed accommodation which affects safety and welfare of students;
- development sites that do not proceed following grant of permission; underutilised accommodation;
- unaffordable accommodation which increases graduate debt can impact on welfare and can undermine the student's contribution to the city's economy.

This has impacts on the availability of sites for investment and alternative uses. The present policy framework offers a very low policy and scrutiny hurdle which is unacceptable from a public policy perspective.

A new Local Plan policy should address:

- The current supply position based on the University's requirements and to discourage purpose build accommodation unless supported by the University;
- Layout standards and management should be in accordance with ANUK/ National Code of Standards for Larger Developments for Student Accommodation Not Managed or Controlled by Educational Establishments. This is a key requirement which the University insists upon for all developments. The University can provide clear minimum requirements for inclusion in the policy to ensure compliance;
- What constitutes a preferred location for student accommodation- this should be defined as focusing upon the Guildhall and University Quarter;
- A requirement for applicants to demonstrate that the University has been consulted in advance on the submission, how the University's requirements have been considered; and how it fulfils these requirements.

#### **Initial Council Response:**

The Council's approach to this issue in the past has been informed by the understanding that there are limits to the extent to which student housing can be regulated through the planning system. However, the current strong activity from private providers in creating new Halls of Residence is clearly an important issue for the city and the new Local Plan. The delivery of new student accommodation is now being recorded and monitored separately and the available evidence on the likely impact upon the existing housing stock is set out in the *Student Housing and Housing Targets* Background Paper. There is a need for further dialogue with the University of Portsmouth to discuss the available options and see if agreement can be reached on the appropriate approach.

#### **Other Options to Consider / Other Comments on Housing**

A number of respondents, including **PDPLA**, made suggestions about how existing buildings could be better used to meet housing need:

- Use of permitted development to allow conversion of existing retail and commercial properties to residential.
- Demolish old and vacant buildings and replace with taller buildings.

**PDPLA** noted that a number of their members would be interested in selling their portfolio if they could invest in new build-housing in the city. This would give the benefit of freeing up existing homes for first time buyers and, if done properly, creating more affordable housing.

- There should be bolder proposals to develop the wasteland in the lower east side of Portsea island.
- Suggest CPO of Tipner site. Why has funding for Tipner been spent on other things? Will the site be delivered by 2034?

#### **Initial Council Response:**

These suggestions will be considered as the plan progresses. The evidence of high levels of housing need places the onus on the Council to consider how those housing needs could be met. The Council is working to deliver Tipner as quickly as possible and the issues surrounding delivery are discussed elsewhere in this document.

## **Housing Requirements**

55 comments received regarding this topic.

### **What level of housing do you think we should be seeking to deliver in this Plan?**

#### **Housing Requirements Options:**

- **HT1a** PUSH Spatial Strategy: Position Statement to 2034 - capacity for 14,560 new dwellings currently identified with work continuing to address the shortfall to meet assessed needs;
- **HT1b**. Objectively Assessed Housing need to 2034 - 17,020 new dwellings.

Neighbouring authorities **Fareham Borough Council** (BC) and **Havant BC** welcomed the Council's commitment to meeting the housing target set out in the PUSH Position statement (14,560 dwellings). **Havant BC** noted the recently published consultation on housing need and stated that all opportunities to provide housing should be taken up. **Gosport BC** noted the evidence on housing need across the wider housing market area and considered collaborative working across the sub region essential.

The majority of respondents called for lower levels of housing to be considered, due to reasons including the quality of life for residents; the potential impact upon the environment; and lack of opportunities to actually deliver housing given the city's constrained geography. A few respondents thought the higher option should be delivered, due to housing need. Others thought the housing target should be limited to the availability of suitable previously developed sites, (with an alternative estimate of capacity at 3,000 homes), or capacity of infrastructure. Retention of greenspace was mentioned as a priority. One respondent considered it impossible to consider the issue of housing numbers in isolation.

A number commented on the perceived imposition of housing targets on local authorities, and thought the provision of any new homes was difficult given the geography of the city and other factors such as infrastructure and quality of life should be taken into account.

Others commented upon the type of housing. Some urged the delivery of more affordable or other types of housing to meet local needs, and noted existing vacant or underused properties. Others noted the relationship between house prices and rents.

One respondent wanted student housing in designated areas to free up local housing stock.

Some development interests suggested the Council should take steps to maximise delivery of housing and consider other approaches and identify other opportunity areas.

### **Initial Council Response:**

This was one of the most commonly responded to topics and it is understood to be crucial to the new Local Plan. There are two main elements – the technical exercise in quantifying housing need, and then the appropriate approach to be followed in the plan, taking into account sustainability and deliverability factors.

Regarding housing need, towards the end of the consultation the Government published a consultation on a new standard methodology for calculating housing need *Planning for the right homes in the right places: consultation proposals* which results in an assessed housing need for Portsmouth of 835 dwellings per annum – higher than the figures in the Issues and Options consultation. The Government has indicated that it will consider the results of the consultation and prepare an amendment to the NPPF in spring 2018. It will be crucial that the new Local Plan contains an appropriate, deliverable response to the requirements of the NPPF and clearly identifies the need for housing in this area using a defensible methodology. This will continue to be an important issue and will continue to be monitored as the Plan progresses.

Regarding the sustainability and deliverability of housing, a range of documents will consider this issue over the coming months. In the first instance, a Housing and Economic Land Availability Assessment will be published which sets out the availability of sites to deliver housing and economic land. That will consider the constraints faced by individual sites and test if they can be overcome. Other work, including an Infrastructure Delivery Plan, Viability Assessment, Sustainability Appraisal, Habitats Regulations Assessment and others will inform a decision on the amount of capacity, sustainability and deliverability of housing in the city.

### 3. Regeneration and the Local Economy

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107 comments received regarding this topic.

#### **Do you agree with the description of issues regarding regeneration and the local economy? What other issues are there to consider?**

Comments were received on the identified main issues for regeneration and the local economy in Portsmouth as well as further points for the Plan to consider, under the subjects below:

#### **Access to employment**

There were a number of comments concerning the balance, or prioritisation, of the relative levels of employment and housing and the potential consequences of these decisions:

- Creating more homes than local work would lead to more congestion and pressure on local infrastructure.
- Out-commuting suggests that the higher paid, professional roles for residents are not found within the city.
- Focus on local opportunities and building immediate local economies so people can live and work in an area of their choice with access to services.
- Housing built to attract higher level workers in the city are sometimes purchased as holiday, student or second homes; include policies to keep the higher quality housing for local residents.
- Converting business space to housing as well looking at the issue of out-of-city commuting is a contradiction.

Congestion was suggested to be the key restriction on the city's economy, and that positive growth would not occur without a focus on sustainable travel. Reduce reliance on cars through expanding public transport provision and other infrastructure to employment sites (inc. the ports) including night-time services. For example the MoD site on Portsdown Hill isn't accessible by public transport.

#### **Educational attainment and skill shortages**

- It was observed that the issues surrounding educational attainment, low earnings and skilled workers living outside of the city have changed little in the forty years.
- One comment suggested that low attainment is a symptom of the "low-achiever culture" in the city.
- As many residents are unable to move on from low paid employment, the focus should therefore be improving skills, particularly focusing those living in areas of deprivation.
- A key issue is thought to be provision of education services and local access to it, as well as the lack of school places at secondary level; without the requisite number of schools and classrooms, educational achievement is bound to be poor.
- It was suggested that poor employability in the city can be linked to the lack of vocational further education courses. Ideas include restoring business-related study courses for adults (e.g. at Highbury College), having more skills based apprenticeships for younger people linked to city businesses and using grant monies to subsidise vocational training.
- Aiming to retain Portsmouth University graduates in the city is supported; there are currently thought to be few opportunities for them.

- It was questioned whether the Higher Education World ranking position for the University of Portsmouth is correct.

## **The Local Economy**

- A weakness of the economy is the lack of 'makers' as Portsmouth's manufacturing is 'assembly' rather than bottom up 'design and build'. This is keeping skills and wages low.
- Consider how to attract more professional, manufacturing, science and engineering companies, technology-based and creative businesses.
- Investigate why financial services do not locate in Portsmouth.
- Invest in and generate opportunities which will generate higher paid jobs.
- Build on the partnership with the University - particularly to attract creative businesses; integrate the University into the city more - for example by using student halls more for tourists out of term time and encouraging more student involvement in the city.
- Although marine sector growth has occurred in the M27 corridor, it is considered that marine related employment in Portsmouth has suffered a substantial decline in recent years e.g. decline in shipbuilding the Dockyard and Raymarine leaving Cosham.
- Create an environment where entrepreneurs would want to set up or where start-ups may incubate. E.g. shared / communal workshops such as FabLabs and MakerSpaces.
- Use shipping containers, or other models similar to London 'pop ups', to support start-ups (e.g. businesses, retail, creative workshops space etc). They can be implemented quickly instead of putting regeneration on hold while major projects are due to be implemented.
- Small start-ups' survival rates are heavily impacted by rising business rates and energy costs.
- Focus regeneration on areas where deprivation is the highest.
- Have a co-ordinated plan that encompasses Gosport, Portchester and Portsdown Hill areas as well as Portsmouth.

The **PDPLA, Portsmouth Fabian Society** and others commented on the potential risks to economic stability from over concentration of certain commercial uses (e.g. coffee shops, estate agents and fast food outlets) and reliance on a few major employers and key industries. For instance, if particular sectors are adversely affected by recession, if demand at the Naval Base changes or there is a downturn in tourism.

## **Other Factors to Support Regeneration and the Local Economy**

It was proposed that the Plan consider the 'basics'; what's needed in terms of wider infrastructure to support the economy, such as schools, health facilities (Local GPs and hospitals). A lack of key infrastructure provision in the south-east of Portsmouth was noted by some.

Other wider issues to consider that contribute to supporting Portsmouth's economy:

- Improve local transportation - utilise opportunities to travel by sea.
- Increase open space.
- Go beyond 'café culture'; include local shops and amenities.
- Support and invest in retail centres and retail parks; make them more appealing to shoppers.
- Protect and enhance the seafront - no more poor quality new buildings, protection of the Eastney nature reserve.

- Preserve and promote the city's historical and cultural integrity, including its maritime and military history. Opportunities at Fort Cumberland and the loss of historical buildings at Tipner were noted.

**Other comments:**

- The city generally lacks 'quality'. E.g. doesn't 'feel' like a university city despite the 24,000 students.
- Encourage new, low cost building techniques and materials to help meet the city's housing requirements.

**Initial Council Response:**

In many respects the comments are broadly in line with the current understanding of the issues facing the city. The proposed actions, including those on transport, skills, and regeneration of deprived areas are all to be investigated and developed further as part of this local plan process. The relative importance of marine related employment is noted.

**What Local Economy options do you think the Council should follow in the new Local Plan? Are there any other options we should be considering?**

**Local Economy Options:**

- **LE1.** Continue to protect land for employment use and seek redevelopment and renewal of the employment sites to provide additional floorspace or a higher quality accommodation.
- **LE2.** Focus significant new employment opportunities on:
  - Portsmouth City Centre for new office uses.
  - Tipner and Horsea island for marine related activities.
  - BAR Racing - The Camber, Port Solent Quay, Trafalgar Wharf and Portsmouth International Port as waterfront sites of sub regional significance to be protected for continued employment use, particularly for activities supporting the marine and maritime sector.
  - Lakeside North Harbour for office development.
  - The Naval Base may provide further employment provision over the Plan period but further discussion is needed with the Ministry of Defence to identify the scale and location of potential future opportunities.

Option LE1 received some support; it was considered to be the less prescriptive option. There was particular support for regenerating existing employment sites in the north of the city due to their proximity to the main access routes.

There was also some general support for focusing significant employment opportunities in the sites listed in Option LE2, specially the BAR Racing HQ at The Camber and Lakeside Business Park and the waterfront sites of sub regional significance (**Gosport Borough Council**) . Although it was suggested The Camber cannot expand its employment uses without improved public transport, potentially including water borne options.

While there is some support for the suggested approach to the Local Economy (**Gosport Borough Council** and others), other comments considered that Options LE1 and LE2 'miss the point' and do not meet the needs of the city. Strategic Options should instead consider where employment is needed. It was also noted that the two Options aren't mutually exclusive.

It was questioned by the Residents of Port Solent Association which part of the site is considered to be "Port Solent Quay"?

Some felt the options are too reliant on a limited number of sites or particular sectors.

The **University of Portsmouth** were disappointed with the extent of the recognition given to the University's contribution to the local economy in Options LE1 and LE2. They request a specific focus on the new employment opportunities that can be created by the University and through spin-off businesses and investment - such as the investment programmes set out in the University Quarter Masterplan. This would link to the Plan's objective to retain a greater proportion of graduates along with the net benefits that investment programmes would bring. They seek that their proposals are given policy status in the Local Plan through an option or allocation.

**The Education & Skills Funding Agency** noted that the Plan identifies issues regarding low educational attainment and social deprivation, but no particular policy Options to address them. They suggest the inclusion of Options for educational improvement in the Local Plan.

## **Alternative approaches to the Local Economy**

### **Policy approach:**

There was some general support for any policy option that would strengthen and regenerate the local economy rather than increase residential development.

Many comments mentioned the need to consider areas in the eastern part of the city for employment opportunities, including Eastney, Fraser Range, the St James' Hospital and Langstone site and the northern end of Eastern Road. **The Portsmouth & District Private Landlords Association** specifically comment that Copnor/ Milton/ Eastney either need better east-west access to workplaces on the western side of the island or more employment locally.

As **Barton Willmore** notes that there are no details of how opportunities will be increased to retain graduates in the Plan - they suggest the Council consider providing physical space within the city to enable businesses and the academic world to improve collaboration, joint ventures and specialist training, as well as providing attractive places for graduates to live and spend their leisure time. This strategy would make use of Portsmouth's existing assets while helping to develop the target industries set out by PCC, this in turn would help Portsmouth retain graduates, as employment opportunities improve. It is considered that retaining graduates is the key to improving Portsmouth's economy.

Alternatively, one comment questioned whether the protection of employment land should continue at all, or be allowed to naturally redevelop to other uses.

The impacts from traffic increases from the specific employment sites must be considered holistically with other development for the city as a whole.

Industrial employment should be towards the north of Portsmouth for proximity to key access and office based employment (design/ software development/ call centres etc) should be close to the retail areas to ensure that they have a ready customer base.

### **Specific Sectors/ Gaps in Provision:**

The Council should look to develop/ include sites for manufacturing opportunities, environmental energy companies and expand other lesser economic sectors (i.e. technology based jobs) to 'futureproof' the economy and reduce reliance on exports due to the uncertainties of Brexit.

Portsmouth, as well as the south coast generally, lacks a sufficient conference centre. **Portsmouth & District Private Landlords Association** suggest a large, flexible seafront or harbour facing development offering a range of spaces, with associated hospitality and hotels.

### **Initial Council Response:**

The responses were broadly in favour of promoting the local economy and employment, with suggestions of additional sites in areas such as Milton to reduce out-commuting. It will be important for the Plan to reflect the role the University plays in the local economy and this will need to be developed further in the coming months in response to the University Quarter Masterplan.

### **City Centre Regeneration**

Many comments focused on the city centre as the 'priority' regeneration project for the city, citing its poor image, quality of offer and environment. It was suggested that regeneration should include:

- Cultural facilities/ space - a focus on art and cultural uses could help to avoid the 'homogenized image' of other town centres in the country and add vitality.
- A focus on the needs of residents.
- Higher quality/ high profile employment offer.
- High quality urban realm - reimagined approach rather than upgrades with 'makeovers'.
- Aiming to retain university graduates.
- A strategy to enhance the night-time economy (**Portsmouth Cultural Trust**).
- Quality dining options to match the offer at Gunwharf Quays.
- Actively encouraging 'quality' food businesses in order to lengthen 'dwell time' and answer the demand for evening dining (students and parents of students in the new developments).
- Diverse range of shops.
- Retention of key stores. Commercial Road needs a new big name 'anchor store' if M&S is soon to depart.
- Reviewing applications for uses of retail units on a case-by-case basis to allow for new food business or the social and cultural element to be included amongst the retail offer.
- Inclusion of the private rented sector.
- Tackling homelessness.
- A sub-committee for the centre.
- Invest in public transport and walking and cycling routes. Regeneration should not hinge on major road redevelopment; Creating places for vehicles do not make attractive public spaces for people.
- It was suggested that too much student accommodation could detract from encouraging quality retail development - the remaining respectable outlets in Commercial Road could further decline.

Recent development at Kings Cross was given as a good example of city living (residential) with a balance of leisure, tourism, retail and a creative industry cluster.

Regarding redevelopment specifically at the northern end of the city centre:

- **Landsec (Gunwharf Quays)** observe that the northern end of the city centre presents an opportunity to widen the land uses in the city centre, including new homes as part of the solution. They comment that any enabling road infrastructure for new city centre development should support growth and regeneration in other parts of the city, including Gunwharf Quays.
- Development on road mains must create an attractive introduction to the city - one comment suggested this should not be housing.
- Redevelopment of the former Tricorn centre area should include low-rise housing integrated with the city centre. It was suggested that more high-rise development would further detract from the attractiveness of the city centre area and lead to unmanageable traffic problems.

Conversely, others suggested that the city centre is a 'lost cause' that cannot compete with other centres and should be released to other uses. Issues and suggestions include the following:

- Mixed comments on the suitability of the city centre for office development; **Portsmouth & District Private Landlords Association** commented that the city centre cannot provide the ease of access, large footprint and on-site parking that companies now look for.
- The lack of any 'special outlook' for new housing (e.g. green space or water) to make them attractive places to live.
- The regeneration of the existing housing stock in the city should be given priority over city centre regeneration.
- Use the proximity to the train station, bus routes and ferry port to become a strategic housing area to meet social and affordable housing needs, together with some employment and tourism uses.
- It was challenged whether Portsmouth could support both Gunwharf Quays and Commercial Road given the average wages in the city. It was suggested that the more affluent areas north of Hilsea are instead served by the east-west corridor (e.g. Chichester).
- Parking is thought to be expensive for the quality of the shopping.
- Close and redevelop entirely, as a hub around the train station.

#### **Initial Council Response:**

The challenges facing the city centre are acknowledged but there is a clear way forward with the new city centre road proposals seeking to facilitate regeneration of the northern part of the city centre. There is a need to complement this work with an investigation into likely land uses and routes to delivery for new development, likely to include residential, retail, employment and cultural uses both in this part of the centre and the Commercial Road area more generally. The *Portsmouth Retail Study* set out evidence on the need for retail floor space across the city but this work needs developing further to provide further detail on the current vision for the city centre and Commercial Road.

## **Other Employment Sites**

### **Naval base**

**Gosport Borough Council** supports any initiative for further employment provision at this site.

Other comments suggest investigating using underutilised land in the dockyard for employment uses and liaison with the MoD to encourage the freeing up or better utilisation of space.

### **Tipner**

Make the redevelopment of Tipner attractive to families. Improve public transport and key infrastructure provision. Avoid or accommodate sites for wildlife.

### **St James' Hospital / Langstone Campus**

Consider options other than housing such as commercial/ leisure/ tourism options.

### **Fraser Range**

Fraser Range was put forward as a site for a business / professional services / finance / insurance business park and residential development. There one detailed suggestion regarding enabling access via a link road from the Eastern Road across the new Milton Common bund and then onto Ferry Point. Such a link would provide boating / marina / associated industries and residential opportunities in what is an underdeveloped and neglected area of the island, whilst also providing a viable alternative to the current inadequate 'Eastern Corridor' transport route for the 42,000 people who live in Baffins, Milton and Eastney.

There was one suggestion for a water based teaching facility at Fraser Range to encourage active lifestyles.

### **Cosham**

Regeneration of Cosham High Street was encouraged. Outside of the high street chain stores there is a high turnover in the other units with prolonged vacancies.

### **Clarence Pier and surrounds**

Consider attracting maritime industry and regenerating the area as part of flood defence work. More waterside bars and leisure facilities along the promenade.

**Tesco in Crasswell Street** in the city centre could be relocated to a site nearer the M275 with the site redeveloped for housing and parking

### **Initial Council Response:**

The role these other areas can play in meeting the identified needs for employment land will be investigated.

## Employment Requirements

35 comments received regarding this topic.

**What amount of employment land do you think we should be seeking to deliver in this plan? What do you think is the correct approach to employment land?**

### Employment Requirements Options:

- **ET1a.** PUSH Spatial Strategy: Position Statement to 2034 - 120,000sqm of new employment floorspace; or
- **ET1b.** Selective release of employment sites for residential development - 100,000sqm of new employment floorspace overall.

The majority were in support of Option ET1a (15 comments) - this was mainly opted for as the higher quantity of employment floorspace. Comments also noted the Local Plan should look to identify and protect the maximum amount of employment land possible, with a focus on retaining existing sites. It was also considered that this is the more sustainable option to reduce commuting and car use by ensuring residents have more opportunities for local employment close to their homes. This contributes to making 'Portsmouth the premier place to live, be employed and visit'. The Plan should take a proactive approach to protect employment land because of the planned increases in residential development, and to help build a more sustainable economy.

**Deloitte LLP - On behalf of Northwood Investors International Ltd (Lakeside Business Park)** made some detailed comments on the approach to employment land requirements. They observe that the Plan uses the quantitative PUSH targets but doesn't recognise the other considerations noted in the Spatial Position Statement, including market signals and other quantitative and qualitative issues including the quality and suitability of existing employment sites and their ability to meet modern business needs. They contend that the approach proposed in ET1a fails to consider the qualitative and micro changes that continue to be experienced in the Portsmouth office market and at Lakeside. The Council's approach to employment floorspace should recognise the particular circumstances at Lakeside, and the lack of viability in undertaking pre-let or speculative construction, in determining the quantum of office floorspace to plan for – currently this has not been factored into the assessments. Without taking consideration of the viability in delivering 120,000 sqm of new build floorspace, this quantum of floorspace is thought to be too optimistic in the current economic market. They suggest an approach of monitoring local indicators, including rent levels; recent transactions; employer requirements and aspirations for economic floorspace; and close liaison with the business community; as recommended by National Planning Practice Guidance.

**Northwood** (Lakeside) consider that Option ET1b proposes a more realistic target, although alternative and complementary uses should form the balance. They note that there are plenty of industrial areas empty at present.

ET1b for the selective release of employment land received some further support (3 comments). It was suggested that available opportunities in the old airport area in Hilsea illustrates that there is opportunity for give-and-take in allocation of office /business/ housing permissions.

### Alternative Employment Floorspace Options/ Approaches

- Lower proportion of employment land - at 25% or 30% [assume this is of the existing quantity].
- Take up high quality opportunities as they arise rather than allocating 'artificial targets' for employment land.
- Concentrate on existing areas of employment.

**Initial Council Response:**

There is a need to ensure that future housing growth is accompanied by economic growth and that the Solent Local Enterprise Partnership growth plans are supported by the new Local Plan. The PUSH Position Statement was published in June 2016 and as such presents a recent assessment of the sub-regional employment position. However, the potential for some limited release or relaxation of employment areas to meet other needs or respond to market signals will continue to be kept under review. There is a need to consider the strategy for employment land provision taking account of both the amount of floor space required and more qualitative issues, such as the quality and suitability of existing employment sites and their ability to meet modern business needs.

## 4. Retail and City Centre

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103 comments received regarding this topic.

### Do you agree with the description of issues regarding retail and the city centre? What other issues are there to consider?

Many of the comments received agreed with and expanded upon the issues identified in the chapter, particularly regarding the city centre, as follows:

- The lack of night time economy after shops close and lack of any leisure uses.
- The poor public realm of Commercial Road - homelessness, drug taking and associated issues creating a fearful environment. It suffers from poor design, dilapidated buildings and piecemeal development.
- The centre is losing trade and stores to other centres (Fareham, Southampton, Hedge End and Whitley were mentioned).
- Many agree with the need to improve the city centre's retail, leisure and entertainment offer.

#### Other issues for the Plan to consider:

- Suitable locations within the centres to accommodate identified needs for retail and other main town centre uses.
- The need to aim for higher quality in the centres, particularly the city centre.
- Centres need to have a unique appeal for visitors and offer a reason to visit and linger.
- Investment in the public realm; in order to increase local and out of town visitors.
- The harm of long term vacant retail units.
- How to attract retailers and a mix of retail that includes more independent stores, not purely national chains. Encourage local themes (e.g. seaside based).
- How to incentivise quality new uses (retail/ restaurants/ bars) without low end options (example of too many charity shops given).
- High rents in centres. One suggestion is to divide up large empty units and offer reduced business rates.
- How to encourage sustainable connections to centres: cycling would require safe, attractive routes and adequate bike parking space if goods are to be transported by bike (e.g. the Dutch use cargo bikes and trailers).
- Improving access to centres and the infrastructure within them.
- The expense and provision of parking. Centres need adequate parking if they are to compete with out-of-town sites. The expense could also affect the vitality of centres: *"No-one will stop for a cup of tea when it cost more to park for 30 mins than the drink!!"*
- Consider the impacts of city centre regeneration on the other Portsmouth centres.

It was suggested that the Local Plan should look at other examples for inspiration such as the revamped Army and Navy store in Chichester or the 'Mercado Centrale' in Florence. The existing style of Guildhall Walk could be built upon and the high quality environment of Gunwharf Quays or West Quay in Southampton could be used as a model for future developments. The Plan should also look at how other cities have tackled the problem of inner city decline.

**What options do you think the Council should follow in the new Local Plan for retail and the city centre? Are there any other options we should be considering?**

**Retail Options:**

- **R1.** Maintain the structure and/ or centres in the existing retail hierarchy.
- **R2a.** Relax existing policy on city, town, district centres to provide greater diversity in secondary frontages including residential, employment, cultural and leisure activities and review centre boundaries; or
- **R2b.** Keep current boundaries for city, town, district and local centres and retain existing primary and secondary retail frontages.

**Retail Centre Hierarchy (Option R1)**

**Landsec** (Owner and management of **Gunwharf Quays**) is very supportive of the continuation of current retail centre hierarchy for the city which includes Gunwharf Quays as part of the formal city centre.

Alternatively, there was a recommendation to reconsider the whole structure of retail hierarchy based on turnover rates.

**Retail Centre Policies Options (Options R2a and R2b)**

While there was some support for the current approach of retaining centres for mostly retail (A1) uses (Option R2b), many comments wanted to see a greater diversity in the mix of uses and a change from the traditional approach to retail planning, to include a review of the existing centre frontages and boundaries (Option R2a). The latter allows for the 'possibility of change or improvement' in centres and the potential of an improved evening economy through increased cultural, social, dining and leisure uses - to create more of an 'experience', particularly higher quality dining. However, it was also noted by the **Portsmouth's Tackling Poverty Strategy Steering Group** that Option R2a could risk making local centres unsustainable by potentially allowing alternative uses that may not meet the needs of the local community.

Further comments on the existing policy approach/ maintain option (Option R2b) considered that it does not recognise the existing and inevitable decline in the high street retail sector and competition from online shopping. The traditional view of retail usage doesn't respond to the changing nature of the industry. Allowing some flexibility would allow for change, such as fluctuation in student numbers affecting trade in the centres for example.

**Portsmouth's Tackling Poverty Strategy Steering Group** consider that it isn't clear enough how any of the Options would differ in delivery or impact.

**Alternative Options/ Approaches to Retail Centres:**

Retain evening uses, including stronger policies to safeguard pubs from changes of use.

**Portsmouth's Tackling Poverty Strategy Steering Group:** Centres should maintain a diversity and balance of businesses that meet residents' needs and support wellbeing. Otherwise centres in more deprived areas can attract businesses that compromise residents' health and wellbeing, such as those offering high cost credit (rent to buy stores, payday loans etc), gambling, and low quality,

unhealthy fast foods. Such uses could be exacerbating the inter-generational cycle of poverty, especially amongst communities who are less able to travel to other retail centres.

### **Initial Council Response:**

The Portsmouth Retail Study set out evidence on the need for retail floor space across the city but this work need developing further to provide further detail on opportunities and a way forward for the town, district and local centres. It is proposed that retail and other issues for these centres are addressed in a background paper to enable proper consideration as part of the Plan process.

### **Portsmouth City Centre (Regional Centre)**

There was a divide in the comments on the overall approach to the city centre; some consider the area as the priority for investment, to be revived to a high quality high street to serve the city, as the offer at Gunwharf Quays is not a substitute. Others feel the city centre has 'failed' as a retail destination and should be allowed to 'die' and naturally turn over into other uses. There was also the suggestion that the economic profile of the area would not support a prosperous high street.

### **Suggested Uses:**

- There were many comments on the need for a greater mix of uses - particularly quality food and drink.
- A unique draw for the centre and different offers.
- An open air / continental/ food market for Commercial Road - it would provide variety and quality for the centre.
- Leisure, culture and 'experiences'.
- 'Anchor' stores to pull in visitors (e.g. M&S and John Lewis).
- Provision for a night time economy - cultural/ leisure (e.g. cinema) and dining.
- Increased residential uses
- Day and night uses of centres such as Cascades.

*For suggested uses of the northern end of the city centre/ former Tricorn site, see section 17.*

### **Centre Boundary:**

Some dispute over whether the city centre area should include Gunwharf Quays, given they are physically separate areas with very different offers. Others wanted to see more linkages between the two if they are to be defined as one centre.

One response gave a detailed walking route suggestion: a walking route via the south-side of Park Road would be greatly enhanced if 1- 2 metres of land could be purchased from the MOD playing fields. This would enable planting and seating in some places and would help to improve public health as both sports players and pedestrians would be further away from vehicles and NO2 emissions from idling engines. Once across the new and improved Anglesea Road crossing, the route could continue through Victoria Park to either Cascades or Commercial Road.

### **Policy Approach:**

- The opportunity should be taken to consider what kinds of activities would attract visitors, rather than preserving the centre in its current form.
- Actively market as a destination to attract quality retailers.
- Maintain Gunwharf Quays in its current form.

- Reorganise Commercial Road, it is currently 'split' by Cascades;
- Make more of Victoria Park as an asset; visibly open up and link to the city centre.
- Any shops leaving Gunwharf should be encouraged to take empty units in Cascades.
- Prevent any single use business district forming. Increasing the housing for graduates/ young professionals in the CBD, together with food and drink options, would reduce congestion and support the wider retail, service and night time economy
- Requires an integrated public transport system; suggestion of electric buses and vehicles and linkages to the underused rail system at Cosham and Hilsea.

The **University of Portsmouth** suggest the University Quarter within the city centre boundary is identified as an Opportunity Area given the specific development and infrastructure opportunities and the possibilities to enhance the city centre's diversity and attractions. It would be linked to promotion of tourism and culture given the contribution that the University makes to the local economy.

### **Initial Council Response:**

The challenges facing the city centre, and the Commercial Road area in particular, are acknowledged but there is a clear way forward with the new city centre road proposals seeking to facilitate regeneration of the northern part of the city centre. There is a need to complement this work with an investigation into likely land uses and routes to delivery for new development, likely to include residential, retail, employment and cultural uses both in this part of the centre and the Commercial Road area more generally. The *Portsmouth Retail Study* set out evidence on the need for retail floorspace across the city but this work needs developing further to provide further detail on the current vision for the city centre and Commercial Road.

### **Southsea Town Centre**

Comments received:

- Make a focus for retailing and maintain existing retail area including the department stores.
- Consider whether the centre can continue to support two large department stores.
- Needs to offer a mix of uses and amenities to avoid becoming a café and restaurant area only.
- Encourage quality high street chains and small independents, the latter offer a reason to visit.
- Needs more dedicated car parking.
- Promote Castle Road for alternative, independent shopping.

### **District Centres**

#### **Policy Approach:**

Enhance District Centres through urban realm improvements and access to sustainable transport routes. Local 'hub' feel may need to be enhanced in some centres by rationalising long, linear centres. Ground floor uses in the 'hub' area should exclude residential but allow restaurants and cafes which could extend the 'life' of centres.

### **North End and Fratton District Centres**

- The Centres are in a poor state and should be a priority for regeneration.

- It was suggested that Fratton doesn't need to be a retail centre due to the proximity of Commercial Road.

### **Cosham District Centre**

- Redevelop Cosham High Street to better support the surrounding demographic who are currently choosing to shop elsewhere.
- Encourage high quality, independent shops and cafes.
- Extend centre to the side roads off the High Street including the library which is an underused resource.
- The Spur Road could become a higher quality alternative to the high street.

### **Albert Road and Elm Grove District Centre**

- Considered successful for its unique shops and character, which should be retained.
- Prevent high rents to help the survival of independent shops and restaurants.
- Resist chain stores in this centre.

### **Local Centres**

More consideration should be given to the local retail centres; new development should be required to take into account connectivity by walking, cycling and public transport.

### **Suggestions for new Local Centres**

- 'Milton Market' parade is valued by the local community and is said to play a pivotal role in serving the local Milton Community; the local services here such as the post office should be protected. The few shops on Locksway Road aren't considered to constitute a local centre.
- Fitzherbert Road in Farlington and other strong retail areas in the Hilsea area.
- Tipner should be priority area for a new centre
- A new retail district comprising Lakeside, Port Solent and Horsea Island.

### **Initial Council Response:**

The *Portsmouth Retail Study* set out evidence on the need for retail floorspace across the city but this work needs developing further to provide additional detail on opportunities and a way forward for the town, district and local centres. It is proposed that retail and other issues for these centres are addressed in a background paper to enable proper consideration as part of the Plan process.

## Retail Requirements

44 comments received regarding this topic.

**Do you have any views on the needs we have identified for new retail floorspace? Do you agree that Portsmouth City Centre is the correct location for new retail floorspace?**

### Retail Requirements Option:

- **RT1.** Locate retail comparison floorspace requirement in Portsmouth City Centre

There was some support for Option RT1 (17 comments). In particular it was noted that:

- New retail floorspace would be beneficial to the city centre and would assist with the regeneration of Commercial Road.
- It remains the most sustainable location given the available space and travel restrictions in Portsmouth, even though the sector is diminishing.

**Landsec (Gunwharf Quays)** is supportive of the 'town centre first' approach to retail and the inclusion of retail development within the strategic options for growth given its importance to the city centre and the performance of the city as a whole.

Others (8 comments), including the **Railways Pension Fund**, support the principle of locating new floorspace to the city centre, but consider that retail uses in isolation would not be successful/ viable and other strategies (e.g. incentives to quality retailers) and uses (cultural, residential, employment and leisure) would be needed to promote the centre, with support for a sustainable transport system. **Northwood Investors (Lakeside)** add that there should be a mix of uses on key employment sites (inc. retail and leisure) to minimise journey times and contribute to their sustainability.

However, others were against allocating further retail floorspace to the city centre, or any new retail floorspace in Portsmouth (13 comments). It is thought to be 'unrealistic' due to the existing lack of demand and major investors for the city centre as well as the decline of retail and high street trade nationally. It was also said that creating more retail space for lower skilled employment while office space is lost to housing doesn't make economic sense.

### Alternative locations for new retail floorspace:

- New floorspace alongside investment in smaller centres.
- An extension of Gunwharf Quays
- Tipner - to reduce traffic congestion into the city.
- Lakeside and Port Solent - to compliment the other outlets along the A27. **Northwood Investors (Lakeside)** would like to see Lakeside's large business population supported by an appropriate level of retail floorspace.

### Suggested Alternative Approaches to Retail Floorspace:

- Focus on attracting retailers and visitors to the existing centres to fill existing floorspace.

- Focus on the most successful retail area in the city and develop that to its maximum capacity, one centre at a time.
- Consolidation of existing retail space in Southsea.

### **Evidence Base Comments:**

One response was of the view that the background evidence on retail (Retail Study 2015 - based on 2014 survey data) for the plan is already out of date; descriptions of the centres were no longer considered to be accurate. They request the study is updated with new data with the recommendations fed into the next draft of this report.

**Landsec (Gunwharf Quays)** also consider the study to be out of date; retail and town centres evidence base needs to be kept up-to-date to take into account retail commitments, the latest economic forecasts, up-to-date information on shopping and leisure patterns and the usage of 'town centres' and the health of defined 'town centres'. Landsec is happy to work with the Council to keep the evidence base up to date. In addition:

- The study lacks qualitative considerations in relation to comparison goods floorspace and commercial review of the potential for different parts of the city centre to accommodate retail development.
- The identified quantity of new floorspace required (for 77,000m sq of additional comparison retail floorspace) is a quantitative need forecast and is based upon the city increasing its market share in comparison goods shopping from 26% to 30% over the Local Plan period. The supporting text in the Plan should make the basis for the capacity forecasts clear.
- The Plan should provide phased capacity forecasts (i.e. up to 2021, 2021-2026, 2026-2031).
- They support the conclusion that there is no quantitative need for additional convenience goods floorspace with the recognition that additional provision may be required on a qualitative and/or locational basis.
- They request the Plan should provide deliverable allocations to accommodate the identified need for retail floorspace and other main town centre uses - to include Gunwharf Quays as part of the city centre.

### **Initial Council Response:**

The challenges facing the city centre are acknowledged but there is a clear way forward with the new city centre road proposals seeking to facilitate regeneration of the northern part of the city centre. There is a need to complement this work with an investigation into likely land uses and routes to delivery for new development, likely to include residential, retail, employment and cultural uses both in this part of the centre and the Commercial Road area more generally. The Portsmouth Retail Study set out evidence on the need for retail floorspace across the city but this work needs developing further to provide further detail on the current vision for the city centre and Commercial Road. Comments on the age of the evidence and potential for renew and refresh are noted – a retail background paper will be prepared which will revisit these issues and may determine that a more comprehensive reassessment of retail needs is required. The role limited retail provision can play in placemaking and ensuring areas remain attractive to employers is acknowledged.

## 5. Tourism and Culture

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83 comments received regarding this topic.

### Do you agree with the description of tourism and cultural issues? What other issues are there to consider?

There was some general agreement with the issues identified, with the following additional issues/suggestions to consider:

#### Culture/ heritage

**Historic England** would like to see greater recognition and co-ordination of all the naval based heritage in Portsmouth, and **Gosport Borough Council** request that this is extended to corresponding attractions on the Gosport side of the harbour.

Greater protection and recognition of the importance of historic cityscape and visual amenity of Portsmouth & Southsea - this is currently considered to be insufficient.

Recognition of history in the north of Portsmouth, potential exists if it could be invested in.

**Portsmouth Cultural Trust** (Managers of the Guildhall) would like to see cultural development play a key role in developing a unique identity for the city that will draw visitors day and night. 'Successful urban regeneration is often achieved when balancing the needs of retail, tourism, accommodation and cultural provision'.

Portsmouth's theatres and other performance venues should be recognised in this chapter (this would also reflect the wording of Objective 4). Concerts and shows are key to creating a vibrant night-time economy, encouraging more overnight stays thus encouraging further hotel development.

Consider the accessibility to the city's cultural offer for residents in areas of deprivation; aim to increase uptake through free and low cost opportunities.

#### Tourism Attractions

Portsmouth's 'unrivalled' tourism potential should be fully exploited, with a greater emphasis on attracting more visitors.

Include reference to the Spinnaker Tower and the Guildhall in the Plan due to the high visitor numbers.

Recognise and build on the tourism potential from the large number of visitors for football games. For example: development of the links between Arthur Conan Doyle and the original Fratton Football Club.

Investment in the city centre

**Landsec (Gunwharf Quays)** support the inclusion of Gunwharf Quays as a tourist attraction amongst the more traditional destinations. It recognises that tourists now have a diverse set of reasons for visiting a particular town or city and provides an opportunity for a longer length of stay in

the city through investment and diversification of the existing offer into a resort concept with hotel, leisure and additional retail offer.

### **Seafront**

There was some different opinion on the provisions for seafront amenities. Some would like to see greater provisions provided (e.g. more cafes, toilets) but others felt the seafront has sufficient development/ attractions and that the seafront is an attraction in itself. There were also comments on the need for higher quality of design and development in this location, referencing some of the current retail outlets and chain hotels. The appearance of seafront cafés such as the Coffee Cup and Southsea Beach Café are popular with some but not with all.

- One response requested more retail near the Hotwalls in Old Portsmouth in a similar style to the studios.
- Consider the potential impact of sea defence proposals (potentially in the form of a new sea wall) on the appeal of seafront, while also looking to the works as an opportunity to improve the seafront area.
- Plan for more ambitious investment and development in seafront/ harbour front and city centre sites.

*Further comments on the seafront were received under the proposed Seafront Opportunity Area in section 22 of this document.*

### **Visitor Economy and Infrastructure**

Comments were received emphasising the economic benefits of tourism including the potential for a greater night-time economy. **Portsmouth Cultural Trust** consider that tourism and culture present significant economic benefit to Portsmouth; there are primary and secondary benefits to enhancing tourism and culture which impacts on local retail, dining, local employment, health and wellbeing. **Landsec (Gunwharf)** acknowledge the role that a revitalised city centre can play in attracting tourists and visitors to Portsmouth and the important economic driver that overnight visitors have on the local economy. The Local Plan also needs to recognise the role improved connectivity of the identified key attractors will have on dwell time and spend per head of the visitors.

The need for more hotels was supported by most respondents , essential for maximum benefits from tourist spend, although one queried the source of evidence for the shortage. However, it is noted that there is no comprehensive strategy for how identified deficits (hotels/ conference and event facilities) will be addressed. New hotel development should be of higher quality design than those recently constructed - it was said that Portsmouth doesn't have any top rated hotels.

Others would like to see the Plan do more to look at job creation opportunities within tourism and culture. However, provision for tourism should be balanced against benefits of other economic sectors, such as development of a hi-tech sector associated with the University for example.

### **Transport**

Many of the comments on tourism and culture focused on transport issues; either focusing on the limitation of existing networks or suggestions for improved access and connectivity for visitors:

- Tourism overall, and particularly access to the seafront, is affected by limited car accessibility and congestion.
- There isn't enough on-street parking or car parking space to accommodate tourists.

- The need for a sustainable transport network to link up all attractions. E.g. For a family visiting the seafront or dockyard by car, walking long distances or waiting and paying for buses may discourage them from exploring the city further. This network would also reduce congestion and increase visitor 'dwell time' and spend per head of visitors.
- Focus on the city's main attractions (Gunwharf Quays and the Historic Dockyard) for sustainable transport links and parking improvements to encourage connecting trips to the city centre and seafront.
- Public transport to the International Port is very poor and not a pleasant environment for visitors.
- Extend the Park and Ride service to Southsea shops and seafront.
- Utilise Portsmouth's potential for water modes of transport. Look at Gosport's water services as an example and consider connections.
- Create more links with the existing travel hubs in Europe via the International Port.
- Reinstate the Hayling Island Ferry bus service and/ or improve cycle links; this would connect to the visitors in the Hayling Island holiday camps.
- Vintage bus or hop on/ hop off bus tours of the city, connecting with The Hard travel interchange.
- A 'little train' service at seafront.
- Improved transport links from the railway stations to the seafront.
- Update/ upgrade the train stations.
- A safe network of cycle routes around the city, linked to longer distance routes from outside the city. Even a practical and affordable bike hire scheme would not succeed without making key junctions and roads safer.
- Clearer signposting between sites to encourage people to walk between Old Portsmouth, Gunwharf Quays, City Centre and Southsea - map boards often get be vandalised.

**Do you agree with the proposed preferred option for tourism and culture for the new Local Plan? Are there any other options we should be considering?**

#### **Tourism Options:**

- **T1.** Retain current approach to enhance the tourist and cultural sector.

The overall view was that the single option presented didn't go far enough. The Option is too vague; the current approach is not explained and the supporting section doesn't offer any further sufficient clarity on what the preferred option actually comprises.

More should be done to promote tourism and culture in Portsmouth. A greater vision for the future of Portsmouth should be sought; 'no greater opportunity exists anywhere else in the UK'. To achieve the Plan's Objectives this section requires re-examination with further research and detail.

#### **Suggested Local Plan Options for Tourism, Leisure or Cultural Uses**

A number of specific locations or sites were put forward to be considered as Options for the Local Plan to allocate for tourism, leisure or cultural uses.

**New Cultural Quarter: Portsmouth Cultural Trust (managers of the Guildhall)** encourage the Council to continue to advance the development of an identifiable cultural quarter which takes in the Guildhall, Guildhall Square and Guildhall Walk, in line with the vision set out in the 2013 City Centre

Masterplan for a civic and cultural centre focused around the Guildhall area. A prerequisite for a cultural quarter is the presence of cultural activity, cultural production (making goods, products and providing services) and cultural consumption (visiting shows, galleries, libraries). Therefore, provision of venues is most critical to a cultural quarter within the area defined; currently, as well as the Guildhall, there is the New Theatre Royal, Central Library, local nightclubs and Guildhall Square.

**Hotel allocations:** The city centre (including Gunwharf Quays) also has the potential for hotel sites given the identified undersupply.

#### **Key Sites:**

A site for the new **Sherlock Holmes Museum** given its international appeal. Such as the former Southsea Police Station or St James Hospital, rather than losing land on Southsea Common.

**Dockyard and Gunwharf** should be the priority development areas as the city's main tourist attractions; improving transport links and parking here could link/ encourage visitors to the city centre and seafront.

**Gosport Borough Council** suggests that **Portsmouth Harbour** is identified as an attraction in its own right (boat trips, views etc.) They request that the Plan works on a cross harbour basis to identify the linked Historic Dockyard attractions on the Gosport side of the harbour, as the adopted Gosport Borough Plan does for the Portsmouth sites.

Develop the land around **Portsmouth Football Club**: make it more attractive, special lighting to match the football colours, better public realm linking Fratton Station to the city centre (Commercial Road). Widen the route from Fratton Bridge along Goldsmith Avenue.

Retain **Eastney Caravan Park** as a tourist destination (and resist any plans to build at Eastney point). Support the previous Seafront Master Plan approach of enhancing the visitor experience by extending the seafront and utilising the heritage asset of **Fort Cumberland** (responses suggest as a museum and a tourist attraction).

Identified use for the derelict **Brunel House overlooking The Hard** - should be a priority.

Alternatively, seek tourism opportunities across the whole city, not just the city centre and Southsea.

**Draft Cultural Policy: The Theatres Trust** has suggested the following wording for a draft policy to encourage cultural activity:

*"Development of new cultural and community facilities will be supported and should enhance the well-being of the local community, and the vitality and viability of centres. Major developments are required to incorporate, where practicable, opportunities for cultural activity to widen public access to art and culture. The loss or change of use of existing cultural and community facilities will be resisted unless:*

- *replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or*
- *it has been demonstrated that there is no longer a community need for the facility or demand for another community use on site.*

*The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also be supported, particularly where they help activate and revitalise town centre locations and the public realm."*

The Theatres Trust also request that the Local Plan should contain a definition of 'cultural and community facilities'. The following is suggested: "*cultural and community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.*"

### **Other comments on Tourism, Leisure or Cultural Uses**

Disappointed that the Marines Museum has left Eastney; it was a valued event space for concerts, balls etc.

#### **Initial Council Response:**

The importance of tourism, leisure and culture was recognised in the Issues and Options document but perhaps the description of the issues and options did not go far enough. Portsmouth has a wealth of cultural, tourism and leisure assets which deserve recognition. The key for the Local Plan is to set out a suitable city-wide strategy for this sector and to identify those specific assets which, by reason of their nature, scale or location, are a key consideration for the future planning of their area. This will be considered further in terms of linking with existing Council strategy, engagement with key organisations, and consideration of strategic sites, broad areas and other site-specific proposals.

Many of the comments concerned the role of transport when considering Tourism, Leisure and Cultural issues. These are useful considerations given the city's role as a significant tourism and cultural centre, and future transport work for the Local Plan will need to consider how to serve venues and events. For instance, a previous attempt to serve Southsea Town Centre with park and ride was not financially sustainable. Solutions need to be found for the long term.

## 6. Health, Well-being and Open Space

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100 comments received regarding this topic.

### Do you agree with the description of issues regarding health, well-being and open space? What other issues are there to consider?

The majority of respondents, including the **Paulsgrove Residents Association** and **Landsec (Gunwharf Quays)**, showed agreement with part or all of the description of issues set out.

Responses were generally supportive of the descriptions of options set out in paragraphs 4.47 to 4.57 of the Issues and Options paper, but some suggestions for further work were made:

- More information needed on the adequacy, or not, of open spaces and sports facilities for current and future population levels.
- A better understanding of links between health, wellbeing and open space and population density and deprivation is required.
- More evidence is required on the economic benefits of a healthy population.
- More evidence is required to understand issues of social isolation.

### Factors impacting Health and Well-being

Respondents including the **Milton Neighbourhood Forum**, **Sustrans**, **Public Health and Portsmouth' Tackling Poverty Strategy Steering Group** noted that the following factors have an impact on health and well-being in the city:

- Poor air quality
- Poor provision of good quality, safe and attractive walking and cycling routes
- The large number of fast food outlets
- Poor provision of green space in densely populated areas
- Lack of acknowledgement between health and education

The **Portsmouth City Council Public Health** team state that consideration should be given to restricting licences for fast food outlets in some areas, such as near schools, as a way of combating childhood obesity. The NICE public health guidance, 'Prevention of Cardiovascular Disease' recommends encouraging planning authorities "to restrict planning permission for takeaways and other food retail outlets in specific areas (for example, within walking distance of schools).

Suggestions were also made as to how the Plan could seek to address these contributing factors:

- Provision of green space on and around buildings i.e. on roofs and green walls.
- Increase tree planting as part of reallocation of road space.
- Protect green space and maximise opportunities to provide new green space
- Increase access and uptake of use of greenspace by those living in areas of deprivation and health inequality.
- Provision of better urban infrastructure to provide free opportunities for physical activity.
- Use Health Impact Assessments within the planning process to help to identify changes that can be made alongside new development to enhance the urban infrastructure.
- Provision of large school playgrounds located away from roads.

- Including the importance of health, well-being and active lifestyles in the school curriculum.

## **Access to Health Facilities**

Responses discussed the current issues accessing healthcare facilities such as GP services. Suggestions were made as to how this could be addressed in the Plan:

- Include GP practices in areas of new housing development.
- Include provision for healthcare facilities to meet the needs of the aging population and those with disabilities.
- Consider how the Council can work more closely with QA hospital to reduce bed-blocking and provide alternative facilities.
- Provision of healthcare facilities to meet a range of needs e.g. the elderly and disabled.

Some respondents also raised concerns that the former St James' Hospital site is no longer allocated for health uses and suggested that the site should remain in health uses to relieve pressures. It was stated that the housing allocation would not meet the objectives to improve health, wellbeing and open space.

## **Active Travel**

Responses from **Gosport Borough Council, Hampshire County Council, Portsmouth Cycle Forum** and **PCC Public Health** and others stressed the importance of the role of active travel in supporting health and wellbeing. It was suggested that:

- The Plan makes reference to the route of the England Coastal Path and National Cycle Network.
- Attractive walking and cycling routes are important. It is acknowledged that it is hard to establish new open space, but it is possible to create attractive routes to it.
- There should be an increase in clearly signed walking and cycling routes, located away from roads to enable people to get to open space and sports facilities.
- There should be a focus on making the city a pleasant place to walk and cycle around. This is particularly important in deprived areas.
- Improving pedestrian and cycling links to the area surrounding the city can aid PCCs approach to improving health and wellbeing by providing high quality recreational opportunities for residents.
- More should be done to discourage car journeys.
- Funding dedicated to traffic improvements could be used to improve cycle infrastructure.

## **Open Space**

Comments indicated a desire to protect open space in public use due to its importance for health, wellbeing and social value. In particular, areas that were seen as important to protect were:

- Green space at St James' Hospital
- Victoria Park
- International coastal designations and wildlife habitats
- The seafront and public access to the shoreline

Some suggested that stronger policies are needed in the new Plan to ensure protection of open space in the face of pressure on space for housing and infrastructure.

A number of respondents, including **Friends of Old Portsmouth Association**, suggested that equality of access to open space is just as important as provision of it. There is a need to eliminate barriers to use.

One respondent suggested that cemeteries and church yards should be included in the public open space description.

Some respondents also requested that more information is made available about the progress with Horsea Country Park and about how the site will be accessed by walking and cycling routes.

Two responded stated that Portsmouth has a low number of quality parks compared to other cities. It was noted that it is important to protect what we have and ensure there is provision of good quality facilities.

## **Nature Conservation and Wildlife**

Respondents including the RSPB, Natural England and Hampshire and Isle of Wight Wildlife Trust acknowledge that green infrastructure needs to be multi-functional but it should also look to protect and enhance areas for wildlife. Some concern was raised regarding the potential impact of development on wildlife habitats:

- It is likely that wildlife habitats will become more fragmented and possibly damaged. Any recreation or health and wellbeing strategies should be informed by robust and up-to-date ecological information.
- Areas of high nature conservation value need to be managed to ensure they remain in favourable condition.
- A recreation management strategy is needed to identify areas of GI that are more resilient and able to withstand recreational pressure.
- Appropriate resources should be made available to manage all areas of green infrastructure, whether for nature conservation or public recreation, equally.
- Consideration needs to be given to sites of importance for designated birds other than Brent geese.
- The Council should consider the value of open space to provide recreational space that is an alternative to the SPA.
- It is important to ensure that there are good links to less sensitive open space to direct recreational pressure away from more sensitive areas.
- Important to include measures for biodiversity enhancements and consider whether existing management measures address the nature conservation interests of existing open space.
- Measures to protect and enhance biodiversity should be incorporated into the Local Plan policies.
- Major development should include provision of GI and open space.
- Local greenspaces in higher density areas should be enhanced.

## Sports Facilities

**Sport England** has identified issues regarding security of tenure and accessibility to naval/MOD sports facilities for clubs.

The **University of Portsmouth** raised the following points regarding sports facilities:

- The University makes an important contribution to health and wellbeing in the city through use of its sports grounds for local community groups as well as promotion of sport to staff and students. These benefits will be enhanced by the University Quarter Masterplan.
- Recommend the indoor sports study, playing pitch and open space strategies are completed and published at the earliest opportunity in order to inform decision-making and robust policies. This is of particular relevance to the Langstone Campus site.

**Landsec (Gunwharf Quays)** acknowledge there will be a need to ensure that a good standard of provision is maintained, and suggests the possibility of relocating existing sports pitches away from the city centre where suitable alternative provision can be made and where redevelopment contributes to the wider objectives of the Local Plan strategy.

**What options do you think the Council should follow in the new local Plan?  
Are there any other options we should be considering?**

### Health and Wellbeing Option:

- **HW1.** Seek to enhance health and well-being through new development in Portsmouth.

Most respondents agreed with Option HW1, stating that it is essential to making Portsmouth a better place to live. However, it was suggested that this was too vague and could be improved as follows:

- Including a provision to ensure that all new residential development must include children's play space.
- Include policy for low-car and car-free development.
- There should be a special focus of this policy on those living in areas of deprivation.
- Include provision of street lighting in parks to encourage use.
- There should be key priorities regarding walking and cycling infrastructure.

### Open Space, Sports and Playing Pitches Options:

- **OA1a.** Retain current approach in the Local Plan to retain green infrastructure, including the Fratton Park/southern Rodney Road for use as a football stadium; or
- **OS1b.** Seek to extend the green infrastructure network.
- **OS2.** Provide additional capacity for built sports facilities in the city.

A number of comments supported Option OA1a, in particular the retention of the football stadium at Fratton Park. It was suggested that existing policy PCS7 should be retained.

Some respondents described Fratton Park as having an entertainment function rather than sport.

There was more support for Option OS1b, including from the **University of Portsmouth**, with a number of suggestions for improvements made:

- There should be a plan for safe and comprehensive walking and cycling networks across the city, connecting all areas to open space and other amenities.
- Protection should be put in place to prevent what little open space we have, including the seafront and beach, being lost to development and there should be enforcement of standards of provision.
- Need to improve what we already have as well as extending the GI network.
- Should include 'pocket parks' in new developments.
- Suggest inclusion of community gardens.
- Suggest a role for community wardens to manage green space.

A number of respondents, including the **University of Portsmouth**, discussed capacity for built sports facilities in the city and supported Option OS2.

- Respondents agreed it is important to keep sports facilities and playing pitches in public use.
- Noted that inclusive access is important for access to sports facilities, as is cost, which can be restrictive.
- There should be more opportunities for residents to use the University sports facilities as a way of improving health and wellbeing.
- More should be done to promote and encourage access to sports facilities that we already have.

**Sport England** note that any of the options selected should be informed by the on-going work to develop a Playing Pitch Strategy and built facilities strategy.

### **Other Options to be considered**

**Education and Skills Funding Agency** highlight the importance of education (including the associated provision of sports pitches) should be reflected in the options, to include:

- Clear indication of the Council's intention to provide high quality school places, either through new schools or the expansion of existing schools, to meet the need and demand generated by development and to tackle the identified issues of low educational attainment and social deprivation.
- Reference to key national policies relating to new school places.
- The principle of safeguarding land for the provision of new schools to meet government planning policy objectives, as well as safeguarding land for future expansion.
- Acknowledgement of Government's commitment to support the development of state-funded schools and their delivery through the planning system.
- Close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places.

### **Other comments on Health, Well-being and Open Space**

A number of comments were received regarding issues of health, well-being and open space in specific areas of the city and made suggestions for provision of specific facilities:

- Seafront flood defence works provide an opportunity to provide better walking and cycling links.
- Suggest the use of Paulsgrove tip for mountain biking.
- There is a lot of excess open space in Eastney and Milton that could be used for housing.
- Land available at St James' and Langstone Campus should be gifted to the people as public open space.
- Land at St James' should have the fences removed so it can be used for sporting events
- Provide a connected green corridor between Milton Common and Eastney.
- Access to open space for those living in the city centre is essential and needs to be improved.
- The Plan should support the Milton Heritage Trail.
- Improve sports and leisure opportunities along the seafront.
- Concern at potential housing development in the Seafront Opportunity Area.
- One respondent suggested provision of a water park.

**Historic England** notes the Council could recognise that Victoria Park, Southsea Common and Kingston Cemetery are all grade II registered historic parks and gardens as well as components of the city's green infrastructure.

#### **Initial Council Response:**

There are a large amount of interrelated issues to be considered for health, wellbeing and open space. To inform the next stages of the Plan, technical work will be prepared to address key identified issues. That includes: an air quality study to consider current and future air quality issues and the potential impacts of predicted growth; an open space study to consider the quality and quantity of open space across the city and in specific neighbourhoods; an assessment of future healthcare needs and infrastructure requirements in the Infrastructure Delivery Plan; an assessment of options for active modes of transport to promote walking and cycling; a paper on the role and opportunities for Green Infrastructure, including for nature conservation and a role in enhancing biodiversity; a playing pitch assessment to identify provision and requirements; and measures in response to emerging evidence on Brent Geese and Solent waders.

## 7. Heritage, Design and the Built Environment

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72 comments received regarding this topic.

**Do you agree with the description of issues regarding heritage, design and the built environment? What other issues are there to consider?**

### Heritage Issues and Options

#### Heritage Option:

- **H1.** No change to the approach to conserve and where possible enhance the city's heritage assets.

Nine respondents agreed with the issues regarding heritage, design and the built environment and had no further comment to make. A range of other positive comments, suggestions, and general points were made by respondents including:

- Noting that heritage is a key component of the city's brand.
- Future development should not be harmful to the historic environment.
- Suggesting that the plan should give more weight to heritage and conservation.
- Noting that the city has a poor record of preservation, a trend which should be halted and reversed.
- Expressing concern at the lack of enforcement and a rise in retrospective applications.
- Noting a perception that conservation requirements can be flouted.
- Highlighting the importance of the definition of heritage in resisting harmful new development.
- Flagging that the surroundings and context of assets need enhanced protection.
- Noting that a more rigorous approach is required to conserve and enhance the city's heritage assets.
- It was suggested that the role of public houses has been overlooked, and they should be protected.
- Cultural heritage requires greater investment.
- There should be more support for interpretation panels and heritage walks.
- The city should have more focus on its naval history.
- Old and empty buildings should be re-used.

Site/area specific comments regarding the need to improve particular areas were made regarding Fort Cumberland and nearby SINC.

The land in these areas should be enhanced:

- Hilsea Lines
- Guildhall and Guildhall Square:
  - Should be improved (in line with the Cultural Trust's Renaissance Plan), in order to deliver greater public benefits/ meet wider social and economic objectives.
  - The north side of Guildhall Square presents a redevelopment opportunity for the city. The construction of a heritage and art gallery here would demonstrate Portsmouth's ambitions as a 'world class' cultural city, and would be a more effective use of the £15 million set aside for a new city centre road.

In terms of more negatively framed comments, 7 responses were received, (6 from members of the Portsmouth & District Private Landlords Association).

- Concern was expressed that heritage should not impede progress.
- It was suggested that assuming anything over 50 years old is a heritage asset is a mistake which restricts progress and development.
- It was also suggested that a 'cost benefit' analysis should be undertaken of heritage assets in the city, and their cost to the public purse, and the benefits which could accrue to the city from potential re-use of the space they sit in. The city should be rid of unnecessary financial burden.

**Historic England (HE)** - the Government's advisor on the historic environment offered lengthy and comprehensive comments on the options. They indicated that the local plan process provides an opportunity to recognise the importance of the historic environment, and its role in delivering wider social, economic and environmental benefits.

They made clear that the views offered at this stage should not be regarded as the definitive comments of Historic England on the plan making process.

They were clear that an adequate and up-to-date evidence base should be the starting point of the plan making process. This should not simply be an exercise in setting out known sites, but in understanding the value to society (i.e. the significance) of sites. As part of establishing this, it may be necessary to:

- Identify assets outside the city's boundary
- Consider asset classes that are currently not well recorded
- Consider parts of the locality that may be worthy of designation as conservation areas off the back of the evidence gathering.

Assessing the likelihood of currently unidentified assets being discovered, it may be appropriate to gather this evidence in a heritage topic paper.

HE asked if the Council has any specific historic environment evidence e.g. An urban survey, an urban archaeological database, a Local list, or a survey of Grade II Buildings at risk.

HE will expect the Council to have an up-to-date and relevant evidence base and to demonstrate in the Local Plan how that has influenced the Plan's policies and site allocations. If the evidence base is weak, HE suggest the Council may need to commission proportionate research in the form of Historic characterisation visual impact assessments, and /or archaeological assessment. They suggest that it may be useful to collect and make publicly available any new evidence generated by the local plan process.

HE are concerned by the absence of any heritage studies, and have indicated that they may be able to assist the Council with additional studies.

The Plan (and Council) should be proactive in the conservation and enhancement of the historic environment. HE consider there should be recognition throughout the Plan of the importance of the historic environment, its role in delivering the Plan's vision and the wider economic, social and environmental objectives for the area. They suggest that policies related to housing, retail and transport, may need to be tailored to achieve positive improvements in the historic environment.

In formulating strategy, HE advise that the plan should address:

- Heritage at risk, and the re-use of buildings.
- The relationship between conservation/heritage assets and Green Infrastructure (GI).
- How development around and/or within heritage assets might better reveal their character and significance.
- How the Historic Environment Record (HER) might assist in identifying and managing the conservation of non-designated heritage assets.
- What implementation partners need to be identified.

HE suggest that the Council should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment. E.g. tall buildings.

HE suggest that wording is included within local plans along the lines of:

*“The Council will monitor buildings or other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners and willingness to consider positively development schemes that would ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers”.*

They also suggest that heritage specific development management policies may be needed. A policy or policies for assessing the potential impact of development proposals on the significance of assets should be included. The policy or policies should set out what is required of applicants in terms of:

- Describing the significance of assets
- Assessing the impact of a proposal on that significance

Historic England suggested the following considerations for Development Management policies per topic:

#### Archaeology

- The preservation of scheduled monuments and other nationally important archaeological sites and their settings; and
- The preservation, in situ, of other archaeological remains or, in those cases where this is not justifiable or feasible, provision is made for excavation recording; and
- Requiring that an appropriate assessment and evaluation is submitted as part of the planning application in areas of known or potential archaeological interest.
- Appropriate publication/curation of findings

#### Listed Buildings

- Ensuring that proposed alterations, extensions or changes of use to listed buildings, or development in their vicinity, will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings;
- Taking measures to ensure that neglected listed buildings are appropriately repaired and re-used.

## Conservation Areas

- Ensuring that development within or which would affect the setting of a conservation area will conserve or enhance those elements which contribute to its special character or appearance;
- Safeguarding spaces, street patterns, views, vistas, uses and trees which contribute to the special character or appearance of that conservation area.
- Where they exist, reference to the fact that Conservation Area Appraisals will be used to guide development in those areas.
- Where up-to-date Conservation Area Appraisals are not available developers are required to submit character statements to demonstrate the impact of the development upon their character and appearance of the conservation area.

## Historic Parks and Gardens

- Safeguarding features which form an integral part of the special character or appearance of the Park or Garden;
- Ensuring that development does not detract from the enjoyment, layout, design, character, appearance or setting of the Park or Garden, key views out from the Park, or prejudice its future restoration;

## Locally important heritage assets

- Setting out definitions of what constitutes a locally important or 'non-designated' heritage asset.
- Providing criteria for their assessment for development proposals, including alteration and extension, and demolition.
- Ensuring applicants are required to demonstrate significance and setting out information requirements for applications.

## General Comments on Design

The Plan needs strong design control so that the city is not exploited for short term gains.

Refurbish the Hard (including Brunel House), Boathouse No 4 and Portsmouth Harbour, Portsmouth and Southsea and Fratton Train Stations

### **Initial Council Response:**

There is clearly a balance to be made between conserving the historic environment and economic development, but this need not be an "either/or approach". The role historic assets can play in enhancing and adding value to regeneration will be considered in each of the strategic sites and broad area proposals. The Council needs to reflect on the advice the Historic England and consider if any element of the evidence base requires reviewing and updating. Further work could be site-specific in nature, where particular assets are affected by development proposals, or more broad in nature.

## Density of Development Issues and Options

### **Density of Development Option:**

- **DD1.** Follow NPPF and seek higher residential densities in areas of high accessibility.

17 individuals/organisations responded on the question of density, including: **Milton Neighbourhood Forum, Portsmouth's Tackling Poverty Steering Group, SUSTRANS, and Portsmouth & District Private Landlords Association.**

Of these responses 13 either did not agree that higher residential densities should be sought, or went further suggesting that the proposal should be resisted, and densities reduced. A range of reasons were provided for this including:

- Option to continue high density housing is wrong.
- Contradicts health and well-being objectives.
- Is unsuitable for areas of high deprivation, and would result in greater deprivation and stress.
- To avoid strain on the city's infrastructure and amenities.

4 responses (including 3 from representatives of **The Portsmouth District Landlords Association**), agreed that higher densities should be sought. They also suggested that the area between Somers Road and Victoria Road North should be classified as highly accessible.

## **Space and Environmental Standards Issues and Options**

### **Space and Environmental Standards Options:**

- **SES1.** Pursue nationally prescribed minimum internal space standards.
- **SES2.** Seek to deliver a significant proportion of homes which can be adapted to meet different accessibility standards.
- **SES3.** Seek higher standards for water efficiency than the minimum building regulation requirements.

8 responses were provided on space standards. These included comments from local amenity group **The Portsmouth Society, The Milton Neighbourhood Planning Forum** and **Portsmouth's Tackling Poverty Strategy Steering Group.**

5 of these responses indicated support for an increase in space standards, (one suggesting re-adoption of the generous 'Parker-Morris' standards).

In addition, the extension of minimum standards to the provision of 'natural' outside/green space was also advocated by 3 respondents.

### **SES 2 Adaptable Homes**

4 responses were received (3 from members of the **Portsmouth & District Private Landlords Association**), asserting that the option SES 2 (to deliver a proportion of homes which can be adapted to meet accessibility standards) is too weak. New homes should be built with widened doors and level access, as should any new business or commercial premises.

### **SES 3 Standards for Water Efficiency**

**Portsmouth's Tackling Poverty Steering Group** indicated support for higher standards of water efficiency.

**The Environment Agency (EA)** commented in some detail on the question of water supply and disposal. Their response is outlined below:

- it is important that Portsmouth City Council contact Southern Water to ensure that there is capacity both within the sewerage system and at the relevant treatment works to accommodate the quantum of development proposed.
- In terms of water supply, Portsmouth City Council should consult with Portsmouth Water to ensure they are confident they can supply water for the quantum of development proposed.
- For information, the water companies are currently undertaking a review of their water resource management plans and this process accounts for proposed new development in Local Plans. We have obviously been involved with the work related to the development of the PUSH Integrated Water Management Study and as stated in your document this should identify actions required to support further housing growth in Portsmouth both to supply water and to deal with waste water to ensure protection and where possible improvement to water quality in Portsmouth Harbour.
- This should be used as evidence to support your plan and the outcomes of the study should be taken account of when considering location, quantum and phasing of development. We are pleased that you have proposed to 'seek higher standards for water efficiency' as one of your options, this is important given the challenge that water resources present in the wider PUSH area and beyond. We would support water efficiency measures being incorporated into new development wherever possible.

**Natural England** also commented that consideration could also be given to a retro-fitting programme for water meters in line with best practice.

### **Other comments on Heritage, Design and the Built Environment**

A number of other points were also made including:

- The topography of the city does not lend itself to tall buildings, attempts to encourage and increase towers are misguided.
- The city's built environment looks poor. A number of recent schemes have fallen short as a result of errors.
- The Council should undertake more building work itself, and improve its consultation with residents.
- The city needs council housing, not 'affordable housing'.
- Portsmouth Cycle Forum commented that: Improved cycle access to Portsdown Hill would help to achieve targets for health improvement, and access to green space.

### **Initial Council Response:**

It is not necessarily the case that higher density development is lower quality. However, the concerns expressed about higher density development are acknowledged and understood. The general desire for higher space and environmental standards is recognised – further work will be required on deliverability and viability but the aspiration is there. There is a need for further work with the water companies and the Environment Agency on the appropriate approach to water standards.

## 8. Tall Buildings

74 comments received regarding this topic.

### Do you agree with the description of issues regarding tall buildings? What other issues are there to consider?

Seven responses directly stated that they agreed with the description of issues regarding tall buildings, with no further points to make. Other points made:

- Tall buildings should meet the needs of all residents regardless of wealth.
- Tall buildings are acceptable in moderation and where they fit in with the surroundings.
- Tall buildings need to meet safety standards - and the capacity of local emergency services.
- The impacts of increasing urban density.
- Addressing parking provision and capacity issues - underground parking is a possible solution.

**Portsmouth Labour Party, GMB** commented that the Council should ensure all older tall buildings are retrofitted with sprinkler systems as all tall new builds are required to do by law.

However, seven comments were against tall buildings in the city of any kind. Individuals stated that they felt tall buildings are unsuited to Portsmouth and detract from the character of the city; there was also the belief that there are already too many tall buildings. Other issues:

- Tall buildings would not provide affordable, inclusive or sustainable homes - not accessible by all members of the community.
- High rise living promotes greater social deprivation. It fails to promote community living and can cause isolation of residents, leading to depression in some. They can also create spaces that encourage anti-social behaviour and other crime.

### Design

Issues of design of tall buildings were commonly raised. **Historic England** observes that tall buildings in inappropriate locations and/or of poor design can detract from the significance of heritage assets. Other points include:

- Consider tall buildings in the context of their environment and use appropriate colours - e.g. no brash colours such as yellow which dominate the view.
- Quality needs to be considered over quantity.
- Public access to roofs and other high level 'piazzas' should be considered as well as chances to join up disconnected areas.
- Tall buildings of good or iconic design should be encouraged wherever the additional population density can be absorbed by local public transport.
- View lines along the seafront should be protected and the present low level of buildings on the eastern corridor maintained (with the Langstone Campus block demolished).
- Partner with research labs at the University Architecture School in order to address design and public realm aspects of tall building design.
- One respondent commented that there should be no tall buildings within 800 metres of any historic or conservation asset, or shadowing any public open space or sports facility.

Relating to design and biodiversity, **Hampshire & Isle of Wight Wildlife Trust** state it is important that the design and locations of tall buildings are fully scrutinised as situated in the wrong location they can be extremely dangerous to migrating bird species. It is important not to restrict assessments to coastal birds, since smaller songbirds will also be vulnerable particularly when they are 'grounded' when migrating during periods of bad weather or at dawn (most are nocturnal migrants).

**What options do you think the Council should follow in the new Local Plan? Are there any other options we should be considering?**

**Tall Buildings Options:**

- **TB1a.** Continue the current approach to discourage tall buildings outside of defined locations; or
- **TB1b.** Actively encourage tall buildings in new locations across the city.

**Option TB1a**

Six respondents, including **PCC Public Health, The Portsmouth Society** and **Portsmouth University**, support option TB1a, to have preferred locations for tall buildings. It was thought that:

- Tall buildings are out of character with much of the city and should be confined to certain areas.
- Groups of tall buildings are more aesthetically pleasing than single stumps.
- Keep tall buildings within currently defined areas unless significant transport improvements can be achieved.
- Higher residential units could be encouraged in defined areas (5-10 floors).

**PCC Public Health** prefer this approach as tall buildings can cause 'severance' which discourages movement around the city by pedestrians, for whom tall buildings can act as barriers. Severance discourages active travel, thus decreasing physical activity, and increasing social isolation, which can lead to mental health problems.

While **Portsmouth's Tackling Poverty Strategy Steering Group** supports the direction of Option TB1a, they would be against increasing the population density in the existing highest density areas.

The **University of Portsmouth** support TB1a but add that where new tall buildings are proposed outside of these locations, they are considered on their own merits against a specific tall buildings policy. For example, where there is a taller building(s) on an existing site that is outside a tall building location, this should not necessarily mean that a replacement or taller building should not be encouraged. Instead, there should be an opportunity to promote the merits of the replacement / new taller building(s) based on the character of the site and other normal development management considerations.

**Option TB1b:**

Two respondents, including the **Portsmouth & District Private Landlords Association** supported option TB1b. While context is important, this approach is less stifling to development. One respondent remarked that Portsmouth needs more tall buildings all along the seafront and harbour front areas and that a big impact development of this nature is essential for the Northern Quarter.

Another respondent said that "tall buildings should be actively encouraged throughout the city when they can imaginatively replace existing poor quality provision."

### **Alternative Options:**

**Historic England** suggests developing a detailed criteria-based policy that ensures that tall buildings are only permitted where they would not have an unacceptable adverse impact on the significance of heritage assets. Whichever Option is chosen, it should be underpinned by an assessment of the capacity of the city for tall buildings and of appropriate, inappropriate and sensitive locations, linked to an assessment of important views within, out of, in to, and across the city, as part of the evidence base for the Plan (and the further work as identified in the document). They add that the existing Tall Buildings Study is eight years old and may need updating, using an up-to-date methodology.

One respondent felt that a well-planned combination of TB1a and TB1b would be the logical answer. Landsec (Gunwharf Quays) took a similar position, making the following points:

- The new Local Plan (and via an updated Supplementary Planning Document) should define specific locations for tall buildings across the city as well as retaining the exceptions policy test under existing Core Strategy Policy PCS24.
- However, the new Local Plan should also reconsider the suitable areas for tall buildings informed by a robust evidence base and context assessment. Landsec supports the identification of The Hard area as a suitable location but considers, in light of the contents of section 7.8(1) of the Tall Buildings SPD, that the area should be expanded to include the Gunwharf Quays and surrounding area. This is because the existing SPD is positive about tall buildings in the Gunwharf Quays area but they consider the current opportunity area around The Hard is too small.

### **No tall buildings**

A number of respondents proposed that tall buildings be discouraged and not be allowed in the city at all due to the city's layout and heritage. A couple of respondents stated that tall buildings significantly detract from the character and live-ability of the city. It was also stated that the height of new buildings should be limited.

### **Locations for Tall Buildings**

- **Northwood (Lakeside)** considers that their site remains a suitable location for tall buildings.
- Areas in or adjacent to the city centre - particular for student density.
- Sites such as Kingston Crescent, Ferryport and the Western Road.
- Vacant Brunel House at The Hard.
- The old BT building in Cosham.
- A residential building with apartments could be appropriate at the old MOD site at Eastney, or a care home for the elderly.

**Residents of Port Solent Association** would oppose any proposals to erect tall buildings within or on the borders of Port Solent. One respondent commented that Cosham High Street does not need any more tall buildings.

**The Portsmouth Society** consider that Admiralty Tower is a good example of a tall building.

**Other comments:**

- Remove current high buildings from areas where they destroy heritage assets, and create proper public space around those that remain.
- Increase provision by raising bungalows another story.

**Initial Council Response:**

The role tall buildings can play in delivering investment, regeneration, new homes and other uses to the city is clear. The consultation responses outline a range of concerns and sensitivities about their suitability in all locations. The issues raised in the consultation need to be considered carefully. In addition to the considerations listed here, further investigation will be given to the operation of the current plan policy, in terms of applications made and pre-application enquiries received, this work will inform an assessment of whether the current approach to encourage tall buildings in certain parts of the city is restricting the overall capacity of the city to attract and support such developments.

## 9. Natural Environment

62 comments received regarding this topic.

### Do you agree with the description of natural environment issues? What other issues are there to consider?

Nine respondents directly agreed with the description of natural environment issues and the overall approach. Others (including the **RSPB**) felt that it lacked ambition for the environmental protection of Portsmouth as well as clarity and detail - and that the short length of the chapter was indicative of its level of importance in the document. Overall, the preservation and enhancement of the natural environment should be stronger - and made a key objective for the Local Plan.

Other issues to consider for the natural environment chapter are as follows:

#### Portsmouth Context and Scope of the Topic

The Plan should include recognition that Portsmouth's environment as an island city is what makes it unique - and that the marine environment is therefore a key consideration for Portsmouth (**Environment Agency**).

The topic should include air quality, noise, odour and water quality and threats such as urban pests. Specifically:

- Sewerage system capacity and the levels of discharge into Langstone Harbour.
- The importance of the Portsdown Hill aquifers for city's water supply.
- **Environment Agency** request more specific reference to water quality and the Water Framework Directive with its objectives to prevent deterioration of water quality and gain improvement where possible.
- **Natural England** advise that concerns have been raised with regard to Southern Water's Draft Water Resources Management Plan and a public inquiry is being held to address these issues. Water resource issues should be included in the HRA screening assessments until the outcome of this inquiry is known.

Currently the chapter has a focus on protected sites of importance for biodiversity. The Plan should go beyond this to include:

- Interrelation of how biodiversity importance relates to green spaces, transport, health and quality of life.
- The value of the natural environment and particular sites for the well-being and amenity of local residents and visitors (e.g. Farlington Marshes and the seafront), as well as their protected status.
- Green infrastructure and connectivity of green spaces.
- Access to the natural environment for all.

#### Biodiversity Issues

**RSPB** requests that the Plan includes: recognition of the contribution of Local Wildlife Sites, a map of sites of nature conservation importance and further explanation on developer contributions -

including clarity on the qualifying impacts and how such funding would be used. The Local Plan should also recognise that waders as well as Brent Geese are both SPA features.

**Butterfly Conservation Organisation** would like to see the inclusion of the butterfly and moth species in need of protection and conservation in the Portsmouth area (including the Small Blue, Chalk Hill Blue, Grayling, Wall Brown, White-Letter Hairstreak and Coleophora Vibicella species) which are noted in the Butterfly Conservation's Regional Action Plan for South East England and Section 41 in the Natural Environment and Rural Communities (NERC) Act 2006 (except the Chalk Hill Blue).

### **Other Strategies and Evidence work**

**Natural England** and the **RSPB** highlighted the following:

- PUSH commissioned detailed studies on the impacts of the new housing development on the water and air quality environment.
- Reflection of the position on recreational disturbance resulting from new development from the Strategy for the Solent Recreation Mitigation Partnership.
- Solent Wader and Brent Goose Strategy - RAPS (Residents Association of Port Solent) request that Port Solent is included in the scope of this study.

### **Area/ Site Specific Suggestions**

Requests were made to recognise the following:

- The potential Solent and Dorset Special Protection Area which covers Portsmouth Harbour.
- Conservation and enhancement of Eastney Beach and its rare vegetated shingle.
- Fraser/SINC site.
- Coastline areas such as the Langstone campus
- M275 entrance to the city should be made into a showcase for the city's natural environment.
- Natural England encourage early engagement on the scope of Biodiversity Mitigation and Enhancement Plans (BMEP) for the proposed strategic development sites in the city.

**Do you agree with the proposed preferred option on the natural environment for the new Local Plan? Are there any other options we should be considering?**

#### **Natural Environment Option:**

- **NE1.** Define the different levels of protection that will be given to spaces depending on their importance for biodiversity.

Again, a number of comments felt the Option, and the supporting chapter, do not go far enough in its detail, scope or ambition - including in terms of the strength of environmental protection proposed.

The Plan should seek maximum protection and enhancement of environmental assets (6 comments) - particularly due to the density of development in Portsmouth and the relative lack of

greenspace. Loss of the natural environment would conflict with the Plan's health and well-being objectives.

Some do not agree that it is possible to mitigate environmental impacts (such as biodiversity offsetting) (4 comments), particularly in monetary terms, so it was considered that this should not be an Option in the Plan.

One respondent felt having different levels of protection for environmental assets would encourage challenge from developers.

While the **RSPB** support the hierarchy approach when considering spaces according to their importance for biodiversity, the Option does not provide detail as to how the Council intends to assess the relative biodiversity value of spaces.

**Natural England** states that the Option should give specific consideration to the qualifying features of the international sites (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites), the interest features of the national sites (Sites of Special Scientific Interest (SSSI)) and other wildlife sites (County Wildlife Sites, Local Nature Reserves, Sites of Importance for Nature Conservation). Consideration also needs to be given to sites used by the qualifying and interest features of the designated sites as well as other sites of importance for biodiversity.

The **Hampshire and Wildlife Trust** state that it is unclear what the Option is seeking to achieve. To merely "define the different levels of protection that will be given to spaces depending on their importance for biodiversity" does not promote the protection or enhancement of those habitats, nor does it seek to protect areas or species that are located outside of the protected areas. Wildlife outside of protected areas, or dwindling but non-endangered species, are declining in part due to the hierarchical approach to nature conservation.

### **Alternative Options:**

Seek to preserve and where possible extend existing green space networks to create green corridors throughout the city.

**The Hampshire and Wildlife Trust** suggest the Council should instead look to identify the species and habitats that are present and then use this information in conjunction with other studies to inform its approach to protecting biodiversity in the City.

**Natural England** and a number of other respondents think the Plan should actively seek biodiversity enhancement and net gains for biodiversity in Portsmouth through a range of small scale measures for new development (e.g. green roofs, roosting or nesting provision on buildings, more street trees, wildflowers) and through Biodiversity Mitigation and Enhancement Plans (BMEPs) approved by a Hampshire County Council ecologist. Rather than focus just on areas with defined environment status, this would give all areas of the city the opportunity to contribute to biodiversity. An Exeter City Council Supplementary Planning Document on the topic is cited as an example. Such an approach would ensure the Plan is in line with the requirements for biodiversity enhancement in the NPPF.

### **Other Comments**

- Once areas of the natural environment are damaged they could be lost permanently.
- All environmental regulations must be followed in the plan process.

- Sites such as Victoria Park and St James' Hospital 'belong' to the people of Portsmouth and should not be developed upon.
- Sustainability Appraisal of the Plan does not go far enough and 'convenient' rather than "correct" decisions are being presented.

**Initial Council Response:**

Key designated sites, such as Portsmouth Harbour and Langstone Harbour, are subject to the highest level of nature conservation protection and this can lead to a focus on those areas with less consideration of the potential for other areas to contribute toward biodiversity and the broader environment. Officers will continue to work with statutory consultees and key organisations to address potential impacts on those other sites and species. In addition, a Green Infrastructure assessment will consider the potential for other added value for the environment across the city.

## 10. Transport

119 comments received regarding this topic.

### Do you agree with the description of issues regarding transport? What other issues are there to consider?

Many of the responses discussed the importance of strategies for transport as being very important in the Local Plan.

Other responses suggested that the description of issues was too optimistic given the rising levels of car ownership and perceived poor public transport network in the city.

Others considered new transport infrastructure will be essential for alleviating pressure on the limited land available and recommended strengthening land and water links.

### Public Transport

A number of respondents raised concerns about bus services in the city:

- They are underused, expensive and infrequent.
- Many services do not run late enough into the evening or to the right places to make them a viable alternative to the car.
- Concerns that the operator is cutting services.
- Much of the eastern side of the city is poorly connected.
- It is often quicker to walk than use public transport.
- It is often cheaper to use a private hire vehicle rather than buses.

Comments were also received from a number of respondents, including the **Portsmouth Liberal Democrats Group**, that make suggestions for improving public transport in the city:

- More traffic free bus lanes are required.
- Buses should be under municipal control, operated on a non-profit basis.
- Consider rapid public transport systems and sustainable personal travel.
- More should be done to promote water transport for commuting purposes.
- Public transport services to the fringes of the city should be improved.
- Provision of a monorail should be investigated.

Other respondents noted that the city has good external transport links but poor internal links. Suggestions were made to locate development close to locations with good rail services, and to do more to promote rail travel rather than car to existing locations.

### Modal Shift and Active Travel

Many responses supported the need to improve walking and cycling infrastructure in the city and suggested that a holistic approach was needed, rather than the current piecemeal approach.

Others suggested that active travel is not practical for family travel and it cannot be expected that people will change their lifestyle to travel sustainably.

A number of issues with the current walking and cycling infrastructure in the city were identified:

- Perceived safety issues make cycling unpopular.
- Cycle theft is a big issue in the city.
- Existing provision is considered insufficient and dangerous and poses a risk for pedestrians and cyclists.

Respondents, including **Sustrans** and the **Portsmouth Cycle Forum**, made suggestions about how infrastructure for active travel could be improved:

- There should be policy developed to reduce the number of cycling casualties.
- There should be a continuous network of cycle infrastructure throughout the city for both strategic and local journeys for confident and beginner cyclists.
- Make use of the new flood defences to create a cycle corridor.
- The assessment of 'walking zones' around district shopping centres would help to identify where more work is needed.
- Cycle specific lanes, whether dedicated or shared, need to be built to the same standards as roads rather than footway specifications leading to lower maintenance costs.

## Air Quality

Responses discussed the issues with air quality in the city and noted that this has an impact on health and wellbeing of residents and the number of people willing to walk and cycle.

Responses, including that from the **Portsmouth Liberal Democrat Group**, noted that high levels of traffic congestion, population density and large in and out flows of traffic needed to be addressed in the Plan.

In order to address issues of poor air quality and the impact this has on health and wellbeing, suggestions were made to:

- Conduct predictions for future levels of traffic and air quality
- Improve public transport provision
- Create safe and continuous walking and cycling routes

## Highway Safety

A number of respondents, including **Friends of Old Portsmouth** and **The Milton Neighbourhood Forum** raised concerns about road safety:

- Walking and cycling in the city is considered dangerous, as shown by the high number of accidents and deaths
- 20mph speed limits are not being adhered to and not enforced which has safety implications, particularly for vulnerable road users
- 20mph speed limits and cycle lanes painted on the road are not enough in isolation to solve safety and congestion issues. There need to be physical measures and a joined-up transport strategy.
- On street parking causes safety issues for cyclists, car drivers and pedestrians and adds to congestion
- Concerns about cyclists riding on the pavement. Particularly an issue for children, mobility impaired and the elderly.

It was suggested that the data used to inform the plan needs to be updated and PCC should consider national strategy on road safety and encouraging modal shift.

## Electric Vehicles

Respondents, including the **Portsmouth Liberal Democrat Group**, noted that Portsmouth is one of the worst cities in the UK for accessible EV charging points. There should be heavy investment in EV charging points to make new development and existing terraced housing fit for a carbon neutral future. Consider provision of electric buses.

## Congestion and Parking

A number of respondents, including **Sustrans**, **Portsmouth Cycle Forum**, **Portsmouth Liberal Democrat Group** and **PDPLA**, suggested that consideration should be given to a number of issues in preparation of the Plan:

- Parking for cars and bicycles, given the high levels of terraced housing.
- Emergence of electric and autonomous vehicles that will impact on air quality, parking and congestion. How to plan for the future without spending too much in the interim whilst technologies emerge.
- Lack of unrestricted east-west flow across the island.
- Poor linking-in of M275 to local arteries.
- The general trend for reduction in driving licenses amongst younger people.
- Thousands of new homes being built along the M27 corridor and the impact this will have on the road network.
- The need to provide high quality shopping, leisure and employment in the city to prevent the need to travel and add to congestion.
- The impact that Gosport/ Fareham commuting traffic has on the road network in Portsmouth.
- Working with the University to prevent students from bringing their cars to the city.

**What options do you think the Council should follow in the new Local Plan?  
Are there any other options we should be considering?**

### Transport Options:

- **TR1a.** Transport Infrastructure provision. Seek transport schemes to support the development planned to take place. Including:
  - South East Hampshire Bus Rapid Transit future phases, including: Fareham to Queen Alexandra Hospital (QAH) in Portsmouth (three routes), Clanfield/ Waterlooville to Portsmouth/ Southsea (two routes) and Havant to Portsmouth (three routes);
  - Links between Tipner and Horsea Island allowing buses, cyclists and pedestrians access between Tipner West and Horsea Island East, the new country park, Port Solent and beyond. Car access would be limited to the business space created in Horsea Island East.
  - City centre road improvements to improve capacity.
  - Park and ride expansion to create additional capacity.
  - Improved rail service to London.
  - Improved rail journey time between Portsmouth and Southampton.
  - Smart Motorways to improve the M27 links to Southampton and intermediate towns.

- **TR1b.** Supplement transport infrastructure with transport congestion measures. Including:
  - A comprehensive electric vehicle charging network across the city for residents, businesses and visitors.
  - Marketing and behaviour change activity to support infrastructure schemes and generate mode shift.
  - Public realm improvements to improve the environment and quality of place for those travelling through areas giving priority to pedestrians and cyclists over motorised vehicles.
  - Road safety education and enforcement campaigns and activities at targeted modes and groups.
  - Working with stakeholders to identify the best solutions and for collaborative delivery where appropriate.
  - A network of continuous cycle infrastructure throughout the city for both strategic and local journeys, confident and beginner cyclists.
  - Redevelopment of Portsmouth and Southsea, and the Harbour Stations.

There was some support for Option TR1a, with respondents, including **PCC Public Health** and **Gosport Borough Council**, making suggestions for how this option could be expanded or amended:

- Suggest also including new train stations such as Paulsgrove, Drayton and Farlington.
- Longer term consider a tram system.
- Improvements need to be made now, not just when development comes forward
- Need to also include safety improvements.
- Also include car sharing lanes as well as smart motorways to cut down on congestion and pollution and improve travel time.
- There may also be opportunities to improve water transport services around Portsmouth Harbour and along the Solent including water passenger services through to Southampton.
- Transport schemes that take place as part of planned development should also include better walking and cycling infrastructure.
- A number of respondents, including the **Friends of Old Portsmouth Association** raised concerns about Options TR1a:
  - Increasing road capacity will only lead to increased traffic, leading to more congestion and further reduced air quality.
  - Building more roads will not aid the aim of reducing private car use.

Others, such as the **Portsmouth Cycle Forum**, only agreed with some aspects of Option TR1a:

- Strongly agree with Park and Ride expansion. Suggest Portsmouth build at least 2 additional P&R locations with improvements to bus lanes to reduce congestion on the island.
- Agree roads need to be improved, but this should involve redesigning so that they are suitable for forms of transport other than the private car.
- Support development of bus rapid transit links in the city.

**Residents Association of Port Solent** agreed with the provision of a link between Tipner and Horsea Island but suggest that this should be for all vehicles to relieve pressure on the junction of Port Way and M27.

There was strong support for Option TR1b above Option TR1a, with the following points noted from a number of respondents including **Friends of Old Portsmouth, Sustrans, Gosport Borough Council, Portsmouth Cycle Forum and Portsmouth's Tackling Poverty Strategy Steering Group**:

- Infrastructure for active travel needs including walking and cycling are more efficient, safer and more convenient than using a motorised vehicle.
- Agree that vehicle use should be decreased. Pedestrians and cyclists must be given priority and safety improved.
- There may also be opportunities to develop stronger 'through-ticketing' public transport across the sub-region which incorporates automatic discounted travel.
- Potential for active travel is huge if new development follows the example and design standards in London.
- Also suggest installing EV charging points in lampposts.
- Filtered permeability should be listed as an infrastructure option to convert short trips to foot or bicycle.
- The Plan needs to ensure that the transport network is inclusive and accessible to all.
- Should include emphasis on improvements to cycling safety and improved park and ride and rail services.

Some respondents queried aspects of Option TR1b:

- The promotion of EVs will not reduce congestion or tackle obesity or road safety.
- It is not realistic to force the population to change its lifestyle.

Options TR1a and TR1b - **The Portsmouth Society** call for links to the South Hampshire Metro as well as more bus priority measures and special measures for football matches and other events. There should be a traffic management system in place for events. There needs to be a focus on EVs in light of Government policy. There should be more trees and shrubs by roads to improve air quality. IOW ferry terminal should be relocated to Portsmouth International Port.

There was support for a combination of aspects from both Options TR1a and TR1b with many respondents noting that these are not either/ or options and both have aspects important for investment. Responses listed the following as the most important aspects to be combined:

- Improvements to the cycle network.
- A combination of improved capacity and modal shift to reduce congestion.
- Strong support for the bus/pedestrian/ cycle link between Tipner and Horsea Island.
- Improving journey times on strategic road network using smart motorways to reduce congestion on local roads.

## **Other Options to be Considered**

Respondents made suggestions for other options that could be considered:

- There needs to be options to rectify the existing transport problems rather than just for new developments.
- Introduce charges for homes with more than one car with monies raised invested in the road network.

- Consider a monorail/ tram/ metro service.
- Consider bus only routes to prevent traffic queuing outside of homes.
- There should be signed, safe and attractive walking routes connecting neighbourhoods within the city centre.
- Introduce congestion charging with a higher charge for more heavily polluting vehicles.
- All new development should be required to pay for signage giving direction and distances to walking destinations.
- On street parking should be eliminated in new developments and there should be strict rules on parking provision.

A number of responses, including those from the **Milton Neighbourhood Forum** and the **Portsmouth Fabian Society**, also made suggestions to include options specific to certain areas of the city:

- Prioritise pedestrians at key junctions such as Fratton Road, London Road, Eastern Road, as at present infrastructure is weighted in favour of the motorised vehicle.
- Make improvements to cycle infrastructure along the seafront to improve safety for cyclists and pedestrians.
- Create a cycle route from Fratton station to Hilsea.
- Allocate land for a rail-freight link along the M275 corridor to the commercial port.
- Make improvements to the Eastern Corridor to include: synchronised traffic lights; improved pedestrian crossings and filtering improvements onto M27.
- Extend the park and ride to serve Southsea and the east of the city.
- Need to widen road from Mile End through to Gunwharf.
- Consider a tram through the city towards Waterlooville.
- Consider a Milton bypass along Langstone shoreline.
- Suggest opening some of the stopped-up roads and removing some of the restricted right turns, in particular Velder Avenue to Milton Road to aid traffic flow.
- Suggest introducing a variable flow system along Eastern Road so more traffic lanes are available to the direction of highest flow, allowing this to change as direction of flows change.
- There should be investment in public transport along Fratton Road/ Kingston Road/ London Road to reduce air pollution.

**HCC Countryside Service** would be keen to work with Portsmouth City Council to improve connections between Hampshire's and Portsmouth's rights of way network. Improvements would help enhance sustainable travel links, as well as providing health and wellbeing benefits to local residents.

### **Other comments on Transport**

- Vans parking in residential streets are an issue for congestion and parking. There should be a specific area for them to park or provision made by businesses to park their vehicles.
- There needs to be real time bus information at all bus stops.

- Railway stations need to be cleaned up and trains need to have space for luggage. This is poor compared to stations and trains in Europe.
- Get rid of the bus lane from the Park and Ride along the M275. It takes too long to travel by car along this road.
- Need to consider parking for Southsea residents.
- Consideration should be given to accessibility for disabled people.
- Issues with traffic being halted in Old Portsmouth due to traffic jams from the IOW Ferry.
- Start a scheme with rail operators to have a well-priced travel ticket in the Portsmouth travel to work area.
- Allow residents aged 60 plus to have a bus pass. This will relieve congestion and encourage greater use of buses.
- Transport will be important for those in shared housing as this type of housing becomes more common in areas with parking restrictions.
- It is near pointless to improve transport as long as there is no limit on car ownership. Suggest all residents intending to buy their first car to have proof of an off-road parking space in order to acquire the vehicle road licence. All new estates should ban overnight on-road parking.
- Suggest use of underground parking facilities.
- Limit parking permits to a maximum of two per household for on street parking.
- Bus services in the city are relatively good.
- Do more to help cyclists and motorcyclists.

#### **Initial Council Response:**

Effective transport networks are critical in the development of vibrant, economically active communities, and have a key role to play in supporting the growth and development of Portsmouth. Individual regeneration projects and development sites, such as Tipner, must be supported by appropriate transport infrastructure promoting active and public travel from the outset, as well as integrating effectively with the wider network with no unacceptable impact. The Local Plan will be supported by a transport evidence base which enables an assessment of the transport impacts of both existing development as well as that proposed, and can inform sustainable approaches to transport at a plan-making level. Following the adoption of the new Local Plan the Council will bring forward a new Local Transport Plan, outlining how investment in the local transport network will support the aspirations of the Local Plan. This will build on the extensive programme of work currently underway addressing many of the issues raised through this consultation including:

- Development of an Air Quality Action Plan, demonstrating how Portsmouth will deliver on the aims and objectives of the recently adopted Air Quality Strategy. Also an assessment with neighbouring authorities to consider current and future air quality impacts of proposed growth
- Pilot projects for both off and on-street electric vehicle chargepoints.
- Working with stakeholders, including the DfT, to develop a Local Cycling and Walking Investment Plan.
- A package of measures to improve transport by all modes on the Eastern corridor.
- Bringing forward proposals for a new City Centre Road to the north of Commercial Road.
- An intelligence led programme of road safety and behaviour change campaigns to promote the safe use of walking and cycling within the city.
- Pilot of Intelligent Transport System technology through vehicle to everything (V2X) communications, creating additional capacity across the network.
- Traffic Signal Optimisation Programme to improve traffic flow at key signalised junctions.

## 11. Other Planning Issues

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39 comments were received regarding this topic.

### Do you agree with the description of other planning issues? What additional issues are there to consider?

Six respondents agreed or broadly agree with the description of other planning issues set out in the Issues and Options document covering Sustainable Development, Delivering New Infrastructure, Flooding and Climate Change.

#### Sustainable Development

- Insufficient weight is being given to the social and environmental costs of development in all 'Issues' e.g. housing numbers are not based on what is socially or environmentally sustainable in Portsmouth.
- The **Hampshire & Isle of Wight Wildlife Trust** made the point that to achieve sustainable development, the protection and enhancement of the natural environment should be given equal weight to health and well-being of residents. Farlington Marshes is a good example of multi-functional green infrastructure but needs to be part of a wider network to prevent the decline of biodiversity.
- **Barton Willmore** comment that there is significant potential to accommodate new development in the city - more efficient use of land in existing industrial/commercial areas to meet the changing requirements of occupiers and the work force and by increasing densities around key transport nodes. They recommend greater utilisation of the 'untapped opportunity' of university graduates for the economy (see further comments in section 3)
- **Hampshire County Council** consider the approach to the minerals and waste and the safeguarding of sites to be appropriate at this stage.

#### Delivering New Infrastructure

Infrastructure and local service provision was raised in a number of responses with concerns that the city's current infrastructure is already inadequate (particularly transport, health care and education), and negatively impacting the quality of life in the city. It was requested that current capacity should be addressed first, before any further development or population growth. Impacts of student numbers from the University of Portsmouth on the capacity of the city for housing, parking, congestion and amenity were particularly noted, as well as the impact on 'false' inflation of population trends.

Concern about future growth on:

- Capacity of South Downs water resources to sustain the growth in the PUSH region, exacerbated by the impacts of climate change.
- Reductions in school play spaces due to rising class sizes - could be contributing to child obesity issues.
- Disproportionate impacts on particular areas of the city - e.g. the impacts of Gunwharf Quays and Portsmouth University on Portsea.

The need for a new Infrastructure Delivery Plan was supported. It should cover the provision of new schools and apprenticeship schemes (consider quality of education at all levels as well as quantity), council housing, care home provision, improvements to sustainable transport and medical facilities, shops or post boxes, cemeteries and allotments. The approach should include:

- A city-wide view of requirements, rather than per development site.
- Co-ordination of all services which require land and infrastructure to avoid reactive policies in the future.
- Availability for public consultation before the new Local Plan is adopted.
- An approach to cycle infrastructure that ensures flood defence work does not prevent a continuous route along the sea front.
- Consideration of the re-use of Langstone Campus to assist with education provision.

**Southern Water** advise that new or improved wastewater infrastructure to support new development may be required during the plan period. Where investment may have long lead in times, it will be important that policies are in place that may need to require the phasing of developments to effectively coordinate the delivery of additional capacity in tandem with development. They request that the following is addressed by the Local Plan process:

- Explicitly encourage and support the delivery of utility infrastructure by the relevant service providers.
- Should any site specific local infrastructure capacity constraints be identified, seek to facilitate direct agreements with service providers in order to deliver any requisite site-related infrastructure in a timely manner.

One respondent highlights the discrepancy in forecasting for future pupil place planning (7 years ahead) and the Plan period (15 years).

**The Education & Skills Funding Agency** note that the Local Plan needs to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements including education facilities. They request the next version of the Plan:

- Confirm the education sites to be allocated and how they will deliver the school places needed to support growth based on the latest evidence of identified need and demand in the Infrastructure Delivery Plan (IDP) and any associated research.
- Site allocations should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. Flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it.
- Specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will need be confirmed at the application stage to ensure the latest data on identified need informs delivery; and that -
- It should note that requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements and is therefore no longer required for school use.

*Section 24: Any Other Comments* - includes further comments on infrastructure.

## **Flooding and Flood Defences**

The topic of flooding and defences was also a source of some commentary with the following points coming up in the consultation:

- Surface water flooding, rather than coastal waters, is now more common and should be addressed by the Plan.
- The approach to seafront defences should be an integral part of the local plan - including their relationship with public realm and urban design, soft versus hard engineering and their rationales and incorporation of sustainable travel routes (e.g. cycleways).
- The need for balance between protection of low lying areas and the amenities at the seafront, but with safety as a priority.

The **Environment Agency** provided the following advice on development and flood risk:

- In line with the flood risk sequential approach, preference should be ideally given to areas of flood Zone 1. If this is not possible need evidence that the sequential test has been undertaken in line with the National Planning Policy Framework. However, as significant areas of Portsmouth are being redeveloped to provide regeneration benefits, it is important that this justification is provided as part of the evidence base.
- Follow the flood risk management hierarchy in respect of allocated sites wholly or partially within flood zone 3, including consideration of residual risk on sites that fall behind defences.
- Provide evidence that all sites that are being allocated partially or wholly within flood zones 2 and 3 have a reasonable prospect of delivery in terms of flood risk, that the flood risk can be managed and the viability retained, and the sites made safe - this may include phasing of development in line with the development/upgrading of defences.
- They recommend providing the most current information regarding the status of the various sections of defence upgrades as background evidence to support the plan.

## **Adaption to Climate change**

Several respondents raised issues relating to addressing climate change in the Local Plan:

- The approach climate change adaptation isn't strong enough. Look to exceed national targets on green energy and increase green coverage to mitigate against the impacts of additional rainfall.
- An unidentified issue is impacts from the loss of green space from private gardens converted to parking and tree felling etc, increasing runoff, especially in view of increased rainfall.
- Several comments were received suggesting that the Council should actively be doing more to increase the generation of renewable energy - such as placing requirements on all new developments (e.g. solar panels).
- Portsmouth should aspire to become a low carbon city with very high rates of walking and cycling, eco-buildings.
- The Council should plant more trees but ensure their maintenance is efficient.
- The move away from fossil fuels and nuclear energy.

## Other Issues

- The plan should be more long-term and more ambitious in scope.
- Address issues such as increasing technology and automation.
- Leaving the EU.
- Attracting employers of the future.

**Health and Safety Executive** have no comments to make at this time but provide an advice note of the relevant guidance and procedures for the Local Plan.

**Winchester City Council** suggest that consideration is given to defining the extent of the adjoining built-up area with a settlement boundary and applying 'countryside' policies to the undeveloped part of Portsdown Hill to reflect and protect its landscape, biodiversity and green infrastructure importance.

## Other Comments

University should be located outside of the city along with student accommodation.

Relating to transport infrastructure, the Council should consider putting a bike path behind the Harvester on the Eastern Road; improving the traffic flow along Goldsmith Avenue between Winter Road and the White House junction; and better links to the motorway from Eastern Road.

### **Initial Council Response:**

The comments and issues raised here will be given consideration as the plan progresses. The issue of flooding and sea defences will be informed by progress on individual flood protection schemes, including the Southsea Coastal Scheme. The support for an Infrastructure Delivery Plan is also noted.

## 12. Identified Work

20 comments received regarding this topic.

**Have we identified all the technical work which needs to be done? What other plans, policies and programmes should be taken into account when preparing the new local plan?**

Two individuals considered all necessary technical work has been identified, but a number of other parties made suggestions for further work which are summarised below.

### Housing

One respondent stated there should be an assessment of the types of affordable homes that are required. The size and types of affordable housing required must accurately reflect needs in the city, taking into account policy drivers such as welfare reform.

### Transport

Three individuals made a number of points about further studies - the need to consider the government's plans for moving away from petrol/diesel cars. A bus lane. New detailed study required on roads and traffic.

### Population, density and health and well-being

The Council should ensure population growth figures are correct and can be shown to be robust.

There should be more technical work to evaluate the social effects of higher population figures and more people living closer together, including impacts upon mental health and increased resources needed for services such as police, health and education.

A number of individuals considered there needed to be more technical work with the Clinical Commissioning Group and NHS on future healthcare, including any need for care bed spaces, access to GP services, bed blocking at QA Hospital, and the health and wellbeing of young people.

### Education and Other Infrastructure

**The Education and Skills Funding Agency** welcomed the commitment to update the Infrastructure Delivery Plan, and recommends that the Council carry out a specific assessment of education needs, to support the IDP and help demonstrate that the plan proposes the most appropriate strategy for addressing the issues around educational attainment and the health and wellbeing of young people, with examples of good practice.

Five other respondents highlighted future education needs and planning for pupil places.

One thought the infrastructure projections are inadequate.

Other topics to consider: Sewers and similar infrastructure and broadband/ Wi Fi.

## Viability

One respondent considered the viability assessment should properly consider the health and environmental impacts of the Plan, not just the funding streams.

## Ecology

**Hampshire and Isle of Wight Wildlife Trust** recommended the Council establish the areas that are important for biodiversity, such as through ecological network mapping and use this to inform where development would be best suited. In addition, the Council should address the Lawton Report and look to protect wildlife outside of protected areas, as well as within them.

Another respondent stated ecological studies must be published before the Plan is finalised otherwise it will be the last issue considered and often ignored.

## Heritage

Historic England recommended an updated assessment of the capacity of the city for tall buildings and of appropriate, inappropriate and sensitive locations, linked to an assessment of important views within, out of, in to and across the city. The existing Urban Characterisation Study of the city will provide useful information to underpin the Plan, but is six years old and may need updating. Questioned whether there is an Urban Archaeological Database for the city. Heritage issues within the city could be identified and addressed through a Heritage Strategy and if not already undertaken, the compilation of a list of locally important heritage assets, a survey of grade II buildings to identify any at risk of neglect, decay or other threats, and up-to-date conservation area appraisals.

## Waste and Energy

One respondent stated recycling is insufficient; consider implementing glass recycling and widening the plastics that can be recycled.

The preparation of a City Wide Energy Strategy was suggested with a focus on eradicating fuel poverty and providing 'clean' fuel for developments.

### **Initial Council Response:**

The need for these additional projects, and their potential to inform the new Local Plan, will be considered as the Plan progresses. For now, the further identified technical work does include housing, population, infrastructure requirements including health and school places, viability, the protection of nature conservation assets and transport.

## Strategic Sites

### 13. Tipner Strategic Site

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50 comments received regarding this topic.

**Do you agree that Tipner should remain a Strategic Site for development in the new Plan? Do you agree with the description of the site, the opportunity it presents and the issues to be addressed?**

36 responses, included those received from the **Milton Neighbourhood Forum** and **Paulsgrove Residents Association**, showed support for Tipner remaining a strategic site for development in the new Plan.

One respondent indicated the support for Tipner being a strategic site and suggested that the development of the site is not happening fast enough with a CPO of the land being considered if the site does not progress.

Other respondents noted that they supported the allocation of Tipner as a strategic site, only if certain criteria could be met, including:

- Provision of necessary road improvements and implementation of public transport links.
- Ensure that the land is decontaminated and tested by independent experts before housing is built.
- Provide sufficient healthcare, education and community facilities to serve the new dwellings.
- The SSSI needs to be protected.

**Southern Water** noted that additional local wastewater infrastructure would be required to accommodate the proposed development at each site. It is required that the development provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.

One respondent noted their support for Tipner as a strategic site, but queried how the overall housing target of the Plan will be met if Tipner is only expected to yield 1250 dwellings.

#### **Non-residential Uses**

One respondent noted their support for Tipner as a strategic site, but suggested that it should be used for employment uses rather than residential, due to the contamination of the land.

Another respondent suggested that Tipner West should not be allocated as part of a strategic housing site but should instead become an area of public open space, linked to Horsea Island.

3 respondents, including the **Portsmouth Society**, suggested that given the perceived non-viability of Commercial Road as a shopping destination, the value of Tipner West as a potential shopping / leisure complex should be investigated.

A number of respondents, including **Portsmouth's Tackling Poverty Strategy Steering Group**, suggested that the policy regarding Tipner should be expanded so that the site provides:

- A mix of property types, sizes and tenures
- A range of affordable housing options
- Good levels of accessibility
- Transport links that meet the needs of the whole community.

## **Wider Considerations**

**The Education and Skills Funding Agency** suggests that the Council consider very carefully the impacts of relocating the Harbour School, a special school for children with Social, Emotional and Mental Health Needs, and work closely with the school to identify all the implications of this before forming an opinion on whether the relocation should be pursued. Any relocation of the school should be to a site of equivalent or better quality and suitability for the needs of the school.

The **Environment Agency** noted that they will continue to work with PCC to bring forward the Tipner sites. It is acknowledged that PCC are aware of the key issues of flood risk, contamination remediation, water quality, the marine environment and European nature conservation designations.

The **RSPB** note that given the proximity of the proposed Tipner site to the Portsmouth Harbour SPA / SSSI - they have serious concerns regarding impacts on the designated features of the adjacent wildlife sites from development in this location. The 'impact upon Portsmouth Harbour SSSI' has been identified as an issue that will require addressing as part of this plan, however, they are very concerned that the plan fails to identify the need to assess impacts to the SPA and its supporting habitats. It is expected that at the next stage of the emerging plan there is a comprehensive analysis of the emerging development proposals (including any mitigation) as part of a robust draft HRA and any sites which fail to meet the legal tests as set out in The Habitat Regulations would need to be removed from the plan.

**Historic England** welcomes the recognition of the Grade II listed former powder magazines at Tipner West. The need to retain these buildings in a sensitive re-use and with an appropriate setting should be identified as an issue to be addressed through the Plan.

## **Other comments on Tipner**

- Development of Tipner will require large amounts of money and work as there is limited existing infrastructure.
- Tipner/ Portchester Lake should be undisturbed; perhaps a low key nature reserve or study centre could be located here.
- Tipner, Horsea Island and Port Solent sites are preferable for redevelopment because there would be little impact on current housing and residents.
- Suggest that the Harbour School could be relocated to the St James' Hospital site before plans are finalised for housing on the land.
- Any development of the Tipner site should be sensitive to the cultural heritage of the area and improve public transport links.

**Initial Council Response:**

Since the preparation of the adopted Portsmouth Plan in 2012 proposals for this area have developed, with the signing of the City Deal with government, the delivery of the M275 junction and the park and ride facility. Planning applications have been received for residential development of part of the site. However, given the significant potential of this area, the presence of sensitive ecological assets and other considerations including flood defences, the presence of Harbour School and listed structures, and the potential for a bridge to Horsea, further work needs to be undertaken to determine appropriate proposals and a way forward for the area as the project moves towards further delivery.

## 14. Port Solent and Horsea Island Strategic Site

47 comments received regarding this topic.

**Do you agree that Port Solent and Horsea Island should remain a Strategic Site for development in the new Plan? Do you agree with the description of the site, the opportunity it presents and the issues to be addressed?**

Over half the respondents considered that this area should remain a strategic site and the description of the site, issues and opportunities were appropriately set out in the consultation document.

**Premier Marinas and CBRE Global Investors** welcome the recognition of a wider strategic site allocation within the emerging Local Plan, which includes the Tipner sites, Port Solent/Horsea Island, as well as the existing Boardwalk and car park, as capable of delivering significant residential, tourism/leisure and economic development, including marina-related development. The site could bring forward at least 500 homes with some delivery within 5 years; Port Solent should be identified as a District, not a Local retail centre; the employment allocation should not be set at 3.4ha as this may constrain delivery.

**RAPS** considered Horsea Island to be better suited to more resident development, accessed via the new bridge to Tipner, rather than Port Solent itself. **RAPS** consider the Plan should maintain the special character of Port Solent, to remove it from the list of Strategic Sites and to find other locations for additional housing, such as Horsea Island (that being dependent on a new bridge link to the M275).

Two people objected due to the loss of open space and the potential for impact upon the harbour environment.

One thought residential development should be the focus of the allocation.

### **Issues to be addressed:**

Some offered qualified support providing impacts such as traffic and other infrastructure can be appropriately dealt with. Others mentioned increased traffic onto Southampton Road which is already congested.

**Southern Water** note that additional local wastewater infrastructure will be required to accommodate development, and that there is existing wastewater infrastructure which will require an easement which may affect the site layout or diversion.

One respondent commented that issues of land quality, sewers and other infrastructure and road access all contributed towards development in this area not coming forward previously and there are therefore questions over deliverability.

The cycle forum considered this should remain a strategic site with the opportunity to create a walking and cycling bridge to connect Horsea Island to Tipner West.

**Port Solent Residents Management Company (POSOL)** noted that Port Solent is a working marina and needs to retain its marine functionality e.g. hoist, repair facilities, chandlers etc. In addition, the area considered in the Issues and Options, extends right up to the water's edge on the

south side of the marina basin. POSOL is party to a legal contract with the Council concerning the boat hoist, the yacht repair facilities and the area reserved for the winter layup of yachts and requests to participate in any discussion which affects these facilities. This focus on marine development was supported by **Residents Association of Port Solent (RAPS)** although they were concerned over residential development at Port Solent. RAPS were concerned about the potential damage to the character, ecological value, and views of the site by further residential development, and considered the site should be allocated as open space.

The **Environment Agency** have noted previous discussions and identified key issues - the closing landfill site and any contamination associated with this, along with potential flood risk, water quality in the harbour and the European nature conservation designations. Careful consideration will need to be given to any new road that is proposed as part of this due to potential instability issues linked to the historic landfilling.

The **RSPB** has raised serious concerns regarding impacts on the designated features of the adjacent wildlife sites from development in this location. The Issues and Options document should note this in the interim Sustainability appraisal in para. 6.21 and the SSSI/SPA designation should be highlighted in the Local Plan and appropriately assessed. The next stage of the emerging plan, should be accompanied by a comprehensive analysis of the emerging development proposals (including any mitigation) as part of a robust draft HRA and any sites which fail to meet the legal tests as set out in The Habitat Regulations would need to be removed from the plan.

**HIWWT** have raised concerns that sites within this strategic site allocation have been identified as being part of the 'core network' of sites used by overwintering waders and brent geese. Sites in this plan and those in neighbouring authorities have been identified as being of importance for over wintering waders and brent geese and any assessment should look to consider potential adverse impacts in combination with other plans or projects. RAPS has also highlighted the potential for disturbing Brent Geese on and near the site.

One person thought the Boardwalk should be redeveloped along similar lines to Gunwharf, but to a smaller scale.

**Initial Council Response:**

There is some support for development of this site with recognition of the potential for ongoing marine uses, though more concerns over residential development in this location. Further discussions are required with Premier Marinas and CBRE Global Investors to understand their aspirations. There are a number of significant constraints affecting the potential development which could be achieved on this site, not least of which is the issue of brent geese and waders. This requires further work with the HIWWT and other partners to understand the emerging evidence on the network of sites and determine a suitable way forward.

## 15. St James' Hospital and Langstone Campus Strategic Site

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74 comments received on this topic.

**Do you agree that Tipner should remain a Strategic Site for development in the new Plan? Do you agree with the description of the site, the opportunity it presents and the issues to be addressed?**

Seven individuals were content with the identification of St James / Langstone as a strategic site as described in the consultation document. One thought it should be purchased by the Council and developed for affordable housing.

Other comments focussed on how the site might accommodate some development but with some or all of the following - provision of public transport links, recognition of access issues, retention of significant open spaces, protection of mature trees, delivery of large family homes, impact on public services and roads, and sufficient parking provision. The importance of north-south and east-west pedestrian and cycle routes was highlighted.

Some thought that development would not support the vitality of retail uses on Milton Road / Locksway Road.

A number of respondents stated they did not want to see St James and Langstone identified as a strategic site. One did not consider a housing only approach to be sustainable development. Others had different views on the potential of the two parts for development.

Three respondents considered the existing policies in the adopted plan, which allows for uses including education and healthcare, to be an appropriate approach.

The lack of existing employment opportunities was mentioned as well as flooding issues.

### **Ecological Value**

Respondents thought increased development would lead to damage to wildlife. A number of respondents highlighted the use of the site by Brent Geese. The **HIWWT** note the playing fields within the St James' Hospital site have been identified as being part of the 'core network' of sites used by overwintering Waders and Brent Geese, and as such there is the potential for the proposals to have a significant adverse effect of the adjacent SPA. One resident noted the survey work was due to be complete in 2018.

The **RSPB** raised serious concerns regarding impacts on the designated features of the nearby wildlife sites from development in this location. The SSSI/SPA designation should be highlighted in the ongoing work and impacts appropriately assessed. The next stage of the emerging plan, should be accompanied by a comprehensive analysis of the emerging development proposals (including any mitigation) as part of a robust draft HRA and any sites which fail to meet the legal tests as set out in the Habitat Regulations would need to be removed from the plan.

One respondent considered the disturbance upon the nearby sensitive ecological sites could not be managed by a cash payment. Doubts were raised about the availability or suitability of any other site to provide suitable mitigation of the impact further development of the University playing fields on sensitive ecological sites.

Others mentioned the potential impact upon the many mature trees on the site.

One respondent thought that St James and Langstone should not be considered as one strategic site.

## **Transport**

Issues raised included traffic congestion, lack of capacity at key junctions, relatively poor public transport, and increased air pollution from more traffic.

Concerns were raised whether there existed capacity in the local road network to accommodate additional development in this area.

The existing travel patterns (out in the day, in at the evening), were noted, and concerns about the areas sustainability.

Air quality issues were also highlighted, at Milton Park School, and throughout the Milton Road, Eastney Road, Velder Ave. corridor.

## **Infrastructure**

**Milton Neighbourhood Planning Forum** raised the following issues:

Local highway capacity, ecology (both on-site and nearby), the future of the Wind in the Willows nursery in the West Lodge, the loss of a green lung for the eastern side of the city/

They stated the site could only be developed for educational or sports uses and considered existing planning policy allows for a better mix of housing including education and healthcare. They noted the site should provide for sustainable transport - not "could" do, and highlight the existing travel patterns in the area, namely that traffic on the Eastern Rd heads north in the mornings returning south in the evenings, which demonstrates the shortage of good employment opportunities and the shortcomings of the Objectives in the "Issues & Options" document. They considered there is no evidence 250+ new houses replacing existing employment uses can be "Sustainable Development".

**English Heritage** welcomes the recognition of the grade II listed St James's Hospital and Hospital Chapel, and the identification of the protection of these buildings and their settings as an issue to be addressed through the Plan.

**Sport England** notes that the site is important for sport and contains significant amounts of playing field marked out as pitches for a range of sports. It also contains a number of Artificial Sports Pitches (AGPs). Sport England would object to any proposed site allocation which does not at least protect this playing field provision; existing sports facilities including any ancillary facilities (eg clubhouses), especially as given the assessment work in progress is identifying a need to protect facilities and playing fields.

**Southern Water** notes that additional local wastewater infrastructure will be required to accommodate development, and that there is existing wastewater infrastructure which will require an easement which may affect the site layout or diversion.

Other significant issues raised included concerns over the capacity of existing healthcare, schools and nurseries, the use of the existing sports fields by different groups, the quality of life brought by

having an open space and "green lung" in the city, and the lack of detail over the potential flooding risk in this area.

It was noted that the Issues and Options document and Sustainability Appraisal wrongly identifies Portsmouth Harbour Special Protection Area and Ramsar site.

## **Other uses**

Some individuals suggested uses other than residential should be considered, notably healthcare (both in the existing listed St James building and elsewhere on the site) or a new school to meet current and future needs. Other uses suggested included using the whole site as a public park, other open space or retained/enhanced sports provision. a site for a relocated Portsmouth university a nursing home / supported housing, and a community facility, a museum / local gallery and a Sherlock Holmes museum or other uses suitable for the historic buildings. A Milton bypass through the site was suggested. One respondent suggested the reuse of the student housing as social housing.

The three main landowners (**Homes and Communities Agency**, the **NHS Property Services** and **the University of Portsmouth**) support the identification of the area as a strategic site. They consider this site is an available, deliverable previously developed site and is suitable for residential development. They have commissioned a team of consultants to prepare a Development Principles and Framework Document (the Framework) to coordinate delivery of development across the site and ensure that infrastructure and mitigation burdens are broadly equalised:

The Framework document is in preparation and is underpinned by a comprehensive environmental assessment process which has identified opportunities and constraints, and informed the emerging development parameters.

The Issues and Options document identifies a series of issues to be considered through the Plan making process.

Issue 1: The capacity of infrastructure, including roads, utilities, and community infrastructure such as schools and community facilities to support development in this location. Consultation with statutory consultees, the LPA and local community have taken place to identify and understand local infrastructure requirements. In addition, statutory consultee responses have been reviewed from the Further Proposed Site Allocations - July 2014. Development parameters will guide the form and location of development within the site and inform how development could be delivered to minimise any adverse impacts. This work includes a detailed assessment of highways, utilities and social infrastructure and capacity. Individual development proposal will then respond to specific infrastructure requirements via direct contribution or obligations within the context of the Framework.

Issue 2: Future provision of private open space which is currently accessed and used by local people and access to the waterfront . One of the key overarching principles of the proposed framework will be ensuring that the development creates a green and attractive environment for new and existing residents. This includes enhancing the mature landscape structure present across the site and allowing this to inform the location and form of develop opportunities. Trees and belts of planting can be incorporated into new public and or private spaces across the site. Access to existing open spaces across the site will be retained as part of the Framework principles.

Issue 3: Cycle and pedestrian links with the wider area and the deliverability of local highway improvements; the Framework will consider options for new east-west and north-south pedestrian and cycle routes. However operational access to Solent NHS facilities must be maintained and any public access in these areas must respect security requirements. The Framework will encourage on plot parking to meet standards to remove potential for any overspill to the adjacent area. The consultant team are undertaking a review of potential highways improvements available to the wider network to mitigate any potential future impacts. This could include, but not limited to, improved bus facilities, enhancement of the National Cycle Network Route 222 and other routes, and specific improvements to junctions around the surrounding site.

Issue 4: The need to ensure playing field provision. A number of open spaces for sport and recreation exist within the site including the Cricket pitch, St James Green and the University playing fields. These spaces serve a wide demographic of users including the local community, university students and staff of the institutions.

Issue 5: Any visual and ecological impact upon the coastline, including the sensitive Brent geese feeding sites. The Framework will include landscape principles to ensure that new buildings are sensitively sited within the mature landscape structure and planned to conceal or frame wider views to maximise and reinforce character areas. There is opportunity to enhance the character and value of existing areas of importance for wildlife through a considered ecological enhancement strategy. The potential for rewilding of the harbour edge, with improved integration between the harbour and Milton Common, will be explored via the Framework and should further enhance ecological provision within this valuable area.

Issue 6: Protection of the listed buildings and their setting (St James' Hospital and the adjoining chapel). The Framework will include a set of heritage principles and parameters to ensure that the heritage assets of the site are understood and respected. A particular area of interest and value is the main façade (south elevation) of the hospital structure which is architecturally picturesque in character and features high quality detailing. Retaining views and vistas towards this façade are important. Elsewhere, the hospital complex has been substantially altered by 20th and 21st century development, and as such some areas now contribute little to the understanding of the asset and its heritage value. These areas represent an opportunity for redevelopment, and the Framework will help to identify appropriate locations and forms of development.

Issue 7: Improvements to flood defences. Baseline environmental assessments have been undertaken to understand the basic drainage and flooding regime of the site to identify constraints to development. There will be opportunities to incorporate drainage features into the open spaces and the potential to also enhance biodiversity and these will be expressed via the landscape principles contained within the Framework.

Issue 8: Protection of viewpoints. See responses to Issue 5 and 6. The Framework will include strong place making and townscape principles; this will include retention and enhancement of key views, vistas and visual connections into and within the site.

Issue 9: A mixture of dwellings including a significant proportion of family housing. The site offers an opportunity to provide a range of house types, sizes and tenures and there are locations within the site that are able to provide large proportions of family housing. This will need to be balanced against site specific requirements for conversions or redevelopment of individual plots.

The **HCA** makes the following points about their land specifically. An outline planning application (OPA) is currently being prepared which proposes the removal of existing buildings and development of up to 115 dwellings and provision of public open space. The application is scheduled to be submitted in Autumn 2017 and given that the new Local Plan is in the early stages of consultation, the application is likely to be determined under the currently adopted development plan for Portsmouth City Council, with limited weight afforded to the emerging policies.

The HCA makes the following statements with regards to the issues set out in the consultation document -

Issue 1: The capacity of infrastructure, including roads, utilities, and community infrastructure such as schools and community facilities to support development in this location. Pre-application consultation with statutory consultees, the LPA and local community have taken place to identify and understand local infrastructure requirements and how the development proposal can help to minimise any adverse impacts and opportunities to deliver improvements. The OPA will be accompanied by an Environmental Report identifying how the proposals have been designed to respond to local infrastructure requirements.

Issue 2: Future provision of private open space which is currently accessed and used by local people and access to the waterfront. One of the key overarching principles of the proposed development is ensuring that the development creates a green and attractive environment for new and existing residents. The illustrative masterplan that will support the OPA shows a potential site layout including 1.32ha of public open space (including a Local Equipped Area for Play). In addition, the proposed design retains and enhances the existing green infrastructure, including retaining tree lines to create linear woodland walks.

Issue 3: Cycle and pedestrian links with the wider area and the deliverability of local highway improvements. The proposed development will contribute to creating north-south connections through the wider strategic site, which is one of the key access and movement principles of the Framework. The site will maintain the existing connections from Locksway Road. Wider site connectivity will be addressed via the development framework. Provision of vehicular and pedestrian links onto Locksway Road and Fair Oak Road, will ensure good connections with the adjacent bus stops and National Cycle Network Route 222.

Issue 4: The need to ensure playing field provision. There are no existing playing fields on the HCA Site. This issue will be addressed separately through the Framework and/or through a future application for the Langstone Campus site, rather than through the OPA for the HCA Site.

Issue 5: Any visual and ecological impact upon the coastline, including the sensitive Brent geese feeding sites. The HCA Site is isolated from the coastal environment and is not a Brent geese feeding site. Nonetheless, the Environmental Report is underpinned by a Phase 1 habitats assessment and Phase 2 species studies to inform the development proposals. The proposed development takes the opportunity to enhance the character and value of existing areas of importance for wildlife through a considered ecological enhancement strategy.

Issue 7: Protection of the listed buildings and their setting (St James' Hospital and the adjoining chapel). The grade II listed St James' Chapel is located to the north of the HCA site on adjacent land. A heritage impact assessment will accompany the planning application and the proposed development will seek to enhance the setting of the listed Chapel via specific landscape treatments south of Woodlands Walk.

Issue 8: Improvements to flood defences. A Flood Risk Assessment and drainage strategy will accompany the OPA. Opportunities to incorporate drainage features into the open space have been explored to also enhance biodiversity.

Issue 9: Protection of viewpoints. The retention of views of the St James' Chapel is one of the key design principles that has guided the development of the OPA masterplan.

Issue 10: A mixture of dwellings including a significant proportion of family housing. The proposed development will provide a range of house types, sizes and tenures, including 30% affordable housing in line with adopted PCC planning policy requirements. The illustrative masterplan proposes an indicative housing mix that would deliver a majority (58%) of 3 bed and 4 bed family houses thereby contributing to meeting the need for family housing provision.

In summary, the HCA strongly supports the inclusion of St James' Hospital and Langstone Campus as a strategic site allocation in the Local Plan, and considers that it is suitable to deliver residential development that will positively contribute to meeting the city's housing need, including affordable housing.

The **NHS Solent Trust** also owns and operates properties at Oakdean, The Orchards and Limes within the site identified in the issues and options document. It is the intention that these properties will remain operational for clinical purposes for the foreseeable future. Any future development of land at St James and Langstone Campus will need to accommodate the continued operation of these properties.

The University considers there are also other potential land use options, so recommend any policy is developed to be as flexible as possible.

In terms of the issues identified in the Issues and Option document, the University make the following comments about the Langstone Campus site.

**Infrastructure Capacity:** we acknowledge this is an important issue for the masterplan area. It is essential that appropriate regard is given to the overall cumulative impact such that future phases do not have to remedy any deficiencies that may have arisen following earlier phases. The findings of the Framework and Evidence Base should form the basis of any site-specific allocation to provide clear guidance on how infrastructure capacity can be phased and delivered. Any planning application in the allocation area should also be supported by an Assessment which identifies how future phases and cumulative considerations can be accommodated satisfactorily.

**Open Space and Waterfront Access:** the Framework will identify opportunities for the provision of Private Open Space in the masterplan and individual development areas and how this can be best taken forward. The campus site in particular offers an opportunity to improve waterfront access for the benefit of the existing and extended local community.

**Cycle & Pedestrian Links:** the Framework will identify opportunities for the delivery of links and how they can be introduced to improve linkage through the masterplan area and with the surrounding locality.

**Playing Field Provision:** the University's landholding includes existing playing fields used both by the University and wider community. The Framework has identified the retention of the playing fields given the pressure on open space provision in the City and the current role of the fields. There should however be sufficient flexibility in any future policy to allow for the development of the

playing field site in the event that a relocation and enhancement opportunity exists elsewhere in the city. The findings of the Open Space Evidence Base are an important element of any strategy and we would welcome the opportunity to comment further on this once it has been published.

**Visual & Ecological Impact:** the University site has important relationships with the Langstone Harbour to the east and is used by Brent geese. It is therefore acknowledged that any scheme which does proceed needs to ensure an appropriate visual and ecological impact. This is assessed further in the Framework.

**Listed Buildings:** there are no Listed Buildings on the University site.

**Improvements to Flood Defences:** there is no specific requirement for the University site to provide improvements to Flood Defences in isolation from the remainder of the masterplan area. Any improvement to this infrastructure component should be reviewed as part of the Framework and its associated Evidence Base.

**Protection of Viewpoints:** there are no specific defined views which need to be protected in the University site. The development of the site offers an important opportunity to enhance the visual character and built environment quality of this part of the City.

**Mixture of Dwellings:** The University in particular offers a key opportunity to deliver one and two bed apartment style units based on the site's existing density/ footprint and the potential to convert or replace taller buildings such as Barnard Tower.

**NHS Property Services** supports the identification of St James as a strategic site. It is the intention of NHSPS to dispose of its land for residential redevelopment to help meet housing needs and ensure the protection and enhancement of important historic assets that have great significance for the local community. The capital receipts and savings generated from the disposal of the property will enable investment in modern services and means of care for the NHS.

NHSPS agrees that this is a sustainable location for new housing. The historic hospital complex has suffered from the addition of utilitarian accretions over many years and NHSPS agrees that redevelopment provides an opportunity to remove unsightly buildings, and deliver new housing, associated parking and open space that enhance the important heritage assets and create a distinctive and successful place that complements the adjoining communities.

NHSPS does not disagree with the potential adverse effects identified in the Issues and Options document, but considerable environmental assessment work has been undertaken on behalf of the three principal landowners and confirms that the potential effects can and will be appropriately mitigated through careful design. Policy will need to be sufficiently flexible and not overly prescriptive if development of all parts of the Strategic Site are to be successfully implemented.

In particular, the capital receipts and revenue savings generated from the sale of sites and properties for "best value" is an important component in helping to provide funding for new or improved health services and facilities. Furthermore, the way in which care is delivered has changed and St James' Hospital would require significant investment and updating to meet modern standards. The sale of St James' Hospital is therefore essential to allow investment in modern service delivery and means of care. The conversion of the vast listed hospital building will be costly, but equally will deliver a very positive and beneficial development, restoring a historically important part of the city, protecting heritage assets and enhancing their settings. The key issue for NHSPS is

how to make that financially viable. This part of the proposed Strategic Site Allocation is highly unlikely to generate sufficient funds for wider infrastructure provision and policy must reflect on the realities of bringing sites of this nature back into long term use.

NHSPS therefore urges PCC to allow sufficient flexibility in the wording of policy to enable and facilitate the redevelopment of heritage assets.

The **Milton Neighbourhood Plan Forum** stated that the Milton Neighbourhood Area and Neighbourhood Forum were designated in July 2015. A draft Neighbourhood Plan has been prepared and should be ready for consultation later in 2017.

They considered there is only passing mention in the consultation document of Neighbourhood Plans. There is no recognition of the two-tier nature of statutory plan-making or of the role of Neighbourhood Plans in making site allocations.

There is no mention of the proposed site allocations in the draft Neighbourhood Plan. Milton Neighbourhood Forum has worked closely with Portsmouth City Council throughout the process, and continues to do so. The lack of mention of the proposed site allocations in the emerging Milton Neighbourhood Plan is therefore surprising and a matter for concern.

The Forum considered the St James' Hospital and Langstone Campus sites have a very different nature and constraints affecting them. The emerging neighbourhood plan proposes separate site allocations for the St James and Langstone sites.

The emerging Neighbourhood Plan has considered these sites in depth, and is supported by a range of evidence. The draft neighbourhood plan includes Special Policy Areas for the sites. These have been shared with the local planning authority previously. We would suggest that the Local Plan either build in these policies, or recognise that the Neighbourhood Plan will make the site allocations and put in place related policies.

The Forum makes the following points regarding the issues for this site:

Capacity of infrastructure, including roads, utilities, and community infrastructure such as schools, to support development in this location: there are already recognised capacity problems in making access to and from the island, especially at peak times. Further work is required by the local authority to assess the viability of development on the island. We would also highlight the air-quality issues arising from traffic congestion.

Any visual and ecological impact upon the coastline, including the sensitive Brent geese feeding sites: The development potential of the Langstone campus site is severely limited by the proximity to the protected coastal zone. A Brent Goose feeding site is within the Langstone campus site.

These factors are addressed by the proposed separate site allocations within the Neighbourhood Plan. This recognises the St James' Hospital site as being suitable for housing. We would emphasise the importance of retaining the existing educational use on the site and the need for new healthcare facilities. The inclusion of Langstone Campus part of the site for housing development is not supported. The Langstone site is proposed to be designated as Local Green Space and the remaining parts for educational, sports and community uses, subject to the sports pitches remaining as undeveloped recreational space.

Protection of the listed buildings and their setting (St James' Hospital and the adjoining chapel): We would also highlight the importance of the unlisted buildings that form part of the grouping with the listed buildings. The other issues identified in the consultation document must also be addressed.

In addition sustainable development is not just about maximising the development of housing, but about planning for balanced growth that includes employment and community facilities.

Allocating both the St James' Hospital and Langstone Campus sites as a single strategic site for housing would remove the capacity for employment and community facilities within the neighbourhood area, including education provision. This would be unsustainable and contrary to the NPPF.

The infrastructure and environmental considerations outlined above would also need to be considered within the context of the National Planning Policy Framework. Therefore it is clear that a completely different approach is required to the St James' Hospital site and the Langstone Campus site. In terms of housing need, the Milton Neighbourhood Area demonstrates a number of demographic challenges including a need for homes suitable for the elderly and those with disabilities and homes suitable for younger people.

In addition to the above, Cllr Dowling submitted a copy of the responses received to the consultation carried out in 2014 on the potential allocation of the land for development of up to 480 dwellings in total.

The responses to that consultation were considered by the Cabinet Member for Planning, Regeneration and Economic Development at the meeting of 2 December 2014. The main issues raised by residents were - sadness / anger at the potential loss of the St James's site; impact on wildlife; impacts of the development on infrastructure; calls for independent assessments of the infrastructure impacts; significant changes to the character of Milton; the driver of development being the maximisation of the receipt for the NHS; the desire for the land to be put to best use for local people. These resulted in respondents objecting to any development at all, or seek a reduced amount of development, or a form of development which could have fewer impacts, including social/care uses such as retirement homes or educational uses.

One respondent noted the high number of responses to the 2014 consultation exercise indicated the deep concerns within Milton.

#### **Initial Council Response:**

It should be recognised that this area has been the subject of a previous consultation in 2014 as part of the proposed site allocations process. The outcomes of that consultation were reported back to the Cabinet Member for Planning Regeneration and Economic Development in December 2014. Since then the major landowners have progressed a joint strategic framework which considers how development of the site may proceed to inform their individual planning applications. That work is still ongoing and the outcomes will inform the new Local Plan.

The Issues and Options consultation focused on potential residential development of the site. The response received from this consultation, including the response from the landowners, indicates that it is likely that a flexible approach is required and a range of uses should be considered for the site. Identified constraints, including the capacity of local transport networks, and the potential impact upon sensitive ecological sites and species, need further work before the capacity and potential uses of this strategic site can be confirmed. The best way to consider this is to assess the site as a whole, rather than individual parcels of land, and for that reason the technical work will continue on that basis, though recognising the different characteristics of the component parts.

The comments on behalf of Milton Neighbourhood Forum require careful consideration. There is clearly a need for both authorities to have a more joined up approach. Further discussions should be held to ensure that the available options and evidence is informing both the local plan and the Milton Neighbourhood Plan.

## 16. Lakeside Northharbour Strategic Site

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40 comments received regarding this topic.

**Do you agree that Lakeside should remain a Strategic Site for development in the new Plan? Do you agree with the description of the site, the opportunity it presents and the issues to be addressed?**

The majority agreed that Lakeside should remain a strategic site for development (26 comments). Support mentioned the following attributes:

- The less restricted location off Portsea Island.
- Employment opportunity and the proximity of employment opportunities for surrounding residential area.
- Value and potential of the site for the development of high tech industry in Portsmouth.
- The site environment - greenery and open space.

**Fareham Borough Council** supports the continuation of Lakeside as a strategic site. They endorse the consistency with the PUSH Spatial Position Statement and the provision of a significant supply of high-quality office floorspace necessary to contribute to the sub-regional floorspace requirements.

**Northwood (Lakeside)** strongly supports the proposal to retain Lakeside as strategic site for employment development in the new Local Plan, and continue to hold the aspiration that Lakeside will remain an office-led campus of strategic importance within the region. The site has:

- Excellent transport connectivity;
- The capacity to deliver substantial employment floorspace, including tall buildings;
- A strategic location at the entrance to Portsmouth.
- The ability to significantly support the proposed Cosham Opportunity Area through local employment opportunities.

However, they disagree with the proposed allocation in terms of the quantity of office (B1) floorspace and types of uses for the site.

- Northwood consider the continuation of the existing site allocation at Lakeside does not reflect the changes that have occurred in the office market since the outline permission was granted (2010), or the current situation at Lakeside. They state that there is not sufficient demand to make office development viable and that this is not anticipated at any point soon given the quantum of existing stock available at Lakeside Campus. They report that there has been no tangible, quality large scale enquiries for offices of a sufficient size to kick-start the development of a new office area and large enquiries received can be accommodated within the currently available existing floorspace.
- Changes in workplace culture and technological advancements (remote/ flexible working, less physical storage space requirements) are said to have resulted in a reduction in their real estate footprint by as much as 20-30% in some cases. Modern business campuses now require supporting amenities to make them sustainable, provide an appealing environment to workers and compete with other centres/ parks. The Council should look to provide a combination of large and small offices for established and new

and young businesses, together with conference and meeting facilities and access to a range of on-site support services, retail and leisure offer and a vibrant public realm.

- This intensification of Lakeside and a wider mix of employment and supporting uses would accord with the principles of sustainable development and the optimisation of the use of land. Flexibility is key if Lakeside is to remain economically sustainable as companies change their office requirements, and remain seek to be socially sustainable as employees change their spatial working practices.
- For Portsmouth to be a credible office location there needs to be a good quality supply of in and out of town space. The Local Plan can help facilitate regeneration in Portsmouth city centre which would re-energise the office market, rather than rely on floorspace at Lakeside.

It is requested that:

- The site description acknowledges that nearly 50% of the PCS5 policy requirement for new office floorspace has been provided in the form of refurbished offices. Further accommodation will be released to the market in the coming months when IBM vacate Building 4000.
- The site plan is amended to correctly reflect the original outline planning permission for B1 office floorspace, which included the surface car parking to the north of the site.
- The new Local Plan reflect the principles of planning in the NPPF in having regard to market signals, providing social, economic and environmentally sustainable development, and not continuing the long-term protection of employment sites.

### **Other Key Issues:**

- Do not lose what makes the site attractive (greenery and open space) for further development.
- Require high standards of design, layout and materials.
- Concern about environmental damage and disruption to wildlife.
- Traffic congestion at Hilsea roundabout.
- Congestion and access difficulties for Highbury residents.

### **Infrastructure**

- Accessibility for workers and to the likely employment pool is key.
- Improve public transport links to the site; one respondent said they had to turn down a job at IBM due to the lack of convenient public transport links.
- Transport links in and out of Portsmouth would need to be improved.

**Environment Agency** note the recognition of the potentially significant flood risk on this site. Flood risk will also need to be managed through any further site specific flood risk assessments at planning application stage.

**Southern Water** state that additional local wastewater infrastructure would be required to accommodate the proposed development, involving making a connection to the local sewerage network at the nearest point of adequate capacity. Their assessment also reveals that there is

existing underground wastewater infrastructure within the site boundary that needs to be taken into account when designing the proposed development. An easement would be required, which may affect the site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting. Southern Water therefore seek the following provisions in the site policy for Lakeside North Harbour:

- The development will provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water.
- Provision of future access to the existing wastewater infrastructure for maintenance and upsizing purposes.
- Suggestions for the future of the site:
  - Double or triple decked and use some of the existing surface parking area for new development instead of green space.
  - Impact assessment in conjunction with the future development of the city - especially impacts on local public services, roads, and traffic, with the necessary mitigation.

#### **Alternative uses:**

- Regional shopping mall to compete with Fareham, Havant and Chichester

#### **Other comments**

Nearby employment site Lynx House has a planning condition that states that should the building become vacant it would be demolished and returned to KG5 Playing Field - shouldn't this be adhered to?

#### **Initial Council Response:**

The reasonably broad consensus over the future use of Lakeside is welcome. The comments received from the site owners will be carefully considered and the implications for the new Local Plan addressed. It should be noted though that the current targets for employment floor space, based on estimates and plans for economic growth, are for a net increase in overall floorspace rather than a reuse of existing buildings.

There was concern that the diagram in the Issues and Options document indicated that the Council was allocating only a specific part of the site for employment uses. This is not the case - the planning approach to the whole of the Lakeside site is being reviewed in this new Local Plan.

# Opportunity Areas

## 17. City Centre Opportunity Area

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51 comments received regarding this topic.

**What do you think about the future of the city centre? What are the issues we need to address and what do you think the Plan should try to achieve?**

Mixed views on the future purpose, or suitability, of the city centre for further development.

Some feel it is the priority regeneration site for Portsmouth, in a highly sustainable location as key 'hub'. Others feel it is 'too late' and that its current condition should be accepted as an indication of the market and be allowed to turnover into other uses, with no further significant investment.

### Issues for the Plan to address:

- Ambitious vision and implementation plan.
- Radical rethink of the city centre in partnership with the University of Portsmouth.
- An imaginative use of space.
- Consideration of new development in this centre in conjunction with the future of the city to include an impact assessment on local public services, roads and traffic with the necessary mitigation.

### The mix of uses:

- Broaden the mix of uses - a mix of high quality retail, business, social space, cultural attractions, leisure (e.g. cinema and ice rink) facilities and residential.
- A focus around cultural and creative industries is key to the regeneration of the city centre - accompanied by mixed use development.
- A major entertainment complex on the former Tricorn site.
- Include residential uses; the centre should be a designated Strategic Housing area.
- Develop the northern end with mixed housing. The additional population would support existing retail and any new retail floorspace.
- Develop as a distinctive, enclosed residential area with a community centre in St Agatha's Church, to create a sense of place and a pedestrian crossing at Market Way.
- Keep the city centre primarily for retail supported by a strong cultural aspect. Only include a small amount of sustainable, high quality homes.
- Place restrictions on the quantity of student accommodation.
- Develop the Charlotte Street area into commercial and eating facilities.
- One comment suggested there may be more demand for mixing high rise residential with fast food and low end retail plus entertainment options.
- Unoccupied shops on Market Way roundabout should be demolished and the area used for new housing or offices.

## Public Realm and Quality of Development

- Public realm work/investment to parallel provision in Gunwharf to make a joined up retail and leisure offer in the city. A more pleasant environment to match popular centres elsewhere.
- Less use of the paved area.
- Improve the quality of eating facilities on Commercial Road.
- Improve and upgrade Guildhall Walk and enhance the Guildhall area back to its original civic status.
- Provide council services in the local hubs to lessen the impact on Guildhall Square.
- Provide dedicated facilities for tackling homelessness and drug abuse. E.g. convert vacant commercial properties into temporary accommodation for the homeless.
- Improve the standards and quality of new homes.
- Improve the image of Landport area; relocate job centre, tackle homelessness, take advantage of the links to the M275. Improve standards and quality of new homes.
- **Historic England** wish to see the conservation and enhancement of heritage assets and of the public realm. The addressing of any assets at risk of neglect, decay or other threats.

## Retail Issues:

- Consolidate unused retail space or improve existing offer before, or instead of, creating additional. Additional empty shops would not improve the centre.
- Aim to improve retail sales and attract quality retailers.
- Focus on the primary retail area where large stores are leaving (M&S, Matalan).
- Find out what the real issues are that prevent Commercial Road from thriving. Are the rent costs too high or the population too poor/ small to sustain a retail centre?
- Any new retail floorspace must be covered mall to be more appealing in all weathers and strengthen the ability to tackle cleanliness and overnight occupation.
- Alternatively - look beyond 'the mall' style attractions of the past. What will be popular in the future?
- Understand the changing face of retail: city centre uses should be reconsidered with reference to emerging patterns of retail and business activity; all forms of retail outlets are declining not just high streets. New or additional purposes need to be considered for retail spaces, although sector trends should continue to be monitored.
- Currently no evening activity: Cascades closed its food hall and there is no year-round late night shopping.

## Employment/ Economic issues:

- Attract big businesses to the city centre.
- Define the need for office space prior to actually developing. Understand the development needs arising from the additional student accommodation in the city centre. Look at footfall, the evening economy and lack of food/leisure offer in the city centre once the shops close - diversify the offer.
- Offices should be encouraged above shops to keep people in the city centre and improve lunchtime trade and footfall.
- Station Street as an office area/ commercial focus. Including high quality public realm and mix of uses to avoid dominance by student accommodation.

**Gosport Borough Council** note that their Borough is an important source of workers, shoppers and visitors to the Portsmouth City Centre Opportunity Area. The recent regeneration of the Hard is welcomed, as would any further developments that improve the appearance of the area. Any proposals that create employment opportunities, including high quality office, accommodation are supported.

**Northwood (Lakeside):** The delivery of new offices through refurbishment could create opportunities within the city centre for regeneration as well improvements to the local economy. They make the following suggestions:

- Make attracting a major office occupier into the city centre a key objective to generate more economic activity for Portsmouth.
- A coordinated approach to delivering projects and/or services to regenerate city centre, for example through a Business Improvement District (BID).
- Consider the role of the university in creating activity and vitality, in addition to improved retailing.
- Encourage high quality Build to Rent residential development.

They state that while Lakeside Campus will remain an office destination, other uses must also be considered to ensure that it remains viable and sustainable for the future. They consider that distributing an element of the office allocation from Lakeside to allow other uses will benefit both the future of Lakeside and the regeneration of the city centre.

**Portsmouth's Tackling Poverty Strategy Steering** Group note that the city centre is located in Charles Dickens Ward, the area of Portsmouth with the highest levels of deprivation. In view of this the Local Plan must:

- Balance development needs with inclusive growth.
- Ensure new development considers the needs of the local community to reduce social exclusion and mitigate the risk of community tensions.
- Development and investment plans identify and meet the needs of local residents, not only those with higher levels of disposable income (such as students and tourists).

#### **Transport/ Connectivity issues:**

- Parking and access issues. E.g. consider underground parking.
- Use existing empty space for major road reorganisation - to be integrated with improved public transport hubs.
- Pedestrian/cycle link between the Guildhall (city centre) and the Northern Quarter.
- Links between the city centre, Gunwharf and Southsea to encourage shoppers to go from one to the other with different retail offer at each.
- **Portsmouth Cycle Forum:** the city centre boundary covers a large area which looks and feels different and disconnected. To join up, make Queen Street a more welcoming and continuous environment to linger, walk and cycle along. Areas close to the city centre do not feel part of it or connected to it. Buckland is cut off by Lake Road traffic - the subway crossing is a single, narrow alleyway between blocks of flats.
- Ban cycling in the pedestrianised areas.
- Make the city centre predominately a walking and cycling district.
- Utilise proximity and links to Somerstown.

**Southern Water** cannot provide a capacity assessment at this stage without specific housing numbers. However, if redevelopment proposals can demonstrate that flows to the sewerage network will be no greater than the current input by existing development, then infrastructure capacity may not be an issue in principle, subject to further assessments when housing numbers are quantified and when proposals come forward.

### **City Centre Landowners / Stakeholder Views:**

**The University of Portsmouth** supports the identification of the city centre as an Opportunity Area. The city centre has significant capacity to accommodate growth across a range of land uses which in turn can deliver a wide range of social, economic and environmental benefits, of which the University Quarter can play a very important role. The University Quarter is mainly with the University's ownership/ control. There is an investment and development programme for significant transformative change as part of their University Masterplan, considered to be deliverable in the next 10-12 years.

It is requested that the Local Plan:

- Gives the University Quarter policy recognition and priority in the Plan.
- Amends the Opportunity Area boundary to include the whole of the University Quarter.
- Identifies the University Quarter as an additional Potential Strategic Site.
- Reviews the City Centre Masterplan (2013) to take into account the University's Masterplan, to ensure the latter has policy support.

The role of a University and the important contribution it can make to positive change and growth is recognised in Development Plans in other parts of the country. Examples of planning policies from a range of university cities are provided in the University of Portsmouth full response.

**Railways Pension Fund** (city centre land owner) supports the principle of the Portsmouth City Centre Opportunity Area and Strategic Site designation for the Northern Quarter and recognises the role that the Cascades Shopping Centre has within these designations.

They request:

- Comprehensive approach to the planning of the strategic site with the rest of the city centre, including the relationship with Cascades Shopping Centre.
- Flexible policy approach that allows for suitable elements to be brought forward on an individual basis. This would allow for a phased approach which underpins and enhances the existing retail and other offers and 'sign posts' further potential.

They note that the proposed allocation retains the existing city centre boundary that encompasses Gunwharf Quays. It is requested that the Plan recognises that the retail core of the city centre is focused on the Cascades Shopping Centre with the Northern Quarter Strategic Site as the principal regeneration initiative. Currently the Opportunity Area does not sufficiently recognise the priorities for the separate sites or distinguish between them.

Railways Pension Fund suggest a specific policy requiring applications for planning permission involving more than 200 sqm of retail or leisure floorspace within the city centre, but outside of a defined core retail area (to include Cascades) as identified on a proposals map. This would require

an application for additional retail or leisure floorspace at Gunwharf Quays to be fully justified. Furthermore, they recommend that the role of Gunwharf Quays in the city centre is further distinguished by requiring all new Class A1 retail floorspace at Gunwharf Quays to be limited to designer outlet operations, and be required to identify the range and type of goods permitted to be sold.

**Centros Portsmouth Limited Partnership (city centre land owner):** The Plan's aspiration for northern end of the city centre, or its proposed policy status, isn't clear. The details for the City Centre Opportunity Area don't describe what sets the 'Potential Strategic Site' apart from the rest of the centre. They also note that the boundary shown on the "Opportunity Area 1 Portsmouth City Centre" plan differs from the adopted city centre boundary, as additional land is included. They query the rationale for this.

Centros agree that the identified need for new retail floorspace should be focused in the city centre, and in particular on the City Centre Potential Strategic Site. They request that this is formally identified in the Plan. They would wish to see Gunwharf Quays and the core 'city centre' maintain their separate roles so not to jeopardise the prospects for regeneration of the City Centre Potential Strategic Site.

The Local Plan should ensure clarity regarding the definition and reference to the city centre and the sub sites (Gunwharf Quays/ Commercial Road/ Strategic Site) in order to ensure new development is directed to the intended locations. Further detail is needed on the vision for City Centre Strategic Site and the proposed new road layout and environmental improvements said to be critical to its redevelopment.

**RPMI Railpen (owners of the Cascades Shopping Centre)** are keen to ensure that the emerging Local Plan recognises the importance and role of the existing shopping centre alongside the appropriate level of ambition for growth and regeneration. The recognition of the need for regeneration of the city centre is welcomed with the acknowledgement that coordinated investment is required to prevent the city centre falling further down the retail rankings.

They are supportive in principal of the proposed Opportunity Area and Potential Strategic Site. They would wish to see inclusion and/ or clarity for the following:

- Continued Plan support for the on-going management and enhancement of key existing assets in the heart of the city centre, including Cascades Shopping Centre.
- The specific development aspirations for the Potential Strategic Site, particularly how it is set apart from the wider City Centre Opportunity Area and its proposed integration with key sites such as Cascade Shopping Centre.
- The allocation of forecast retail floorspace needs located to the Potential Strategic Site and key adjacent sites on Commercial Road (such as Cascades Shopping Centre), as opposed to other city centre locations, to enable the key regeneration aspirations of the city centre to be realised.
- Consideration of the proposed road re-routing in the context of their land holding, and the land owned by Delancey immediately north, whose sites are likely to be redeveloped as a first phase of regeneration of the core retail area.

**Landsec (Gunwharf Quays)** are supportive of the potential strategic allocation and recommend that the City Centre Opportunity Area has its own suite of policies to set out the development

framework and range of land uses for the city centre. Landsec would also support the need for a refreshed masterplan for the city in partnership with key stakeholders, such as themselves.

They request that a further Strategic Site is identified for the southern and south-western parts of the Opportunity Area, covering Gunwharf Quays as a focal point within a potential redevelopment area (for a mixture of residential, employment, retail, leisure, education, entertainment and sporting uses). This would provide an enhanced route between the waterfront and other parts of the city centre, particularly pedestrian and cycle connectivity routes between the north-eastern part of the city centre and the waterfront area (including Gunwharf Quays). They suggest the following planning principles for this allocation:

- Gunwharf Quays as the preferred location for town centre uses, with support for additional retail, leisure food & beverage, hotel and entertainment uses.
- Continued support for the development of the Hard as a vibrant waterfront destination with improved public realm and access and linkages to Gunwharf Quays and the railway station.
- Improved railway station and ferry terminal area, in order to improve the attractiveness and operation of these transport links with introduction of additional town centre uses where appropriate.
- Recognise that the HMS Temeraire area sporting facility is not an efficient use of land in a city centre location. If alternative suitable replacement provision can be made, then this area represents a key intensification opportunity for mixed use development which provides an important pedestrian and cycle connectivity link between the waterfront, historic dockland and Gunwharf Quays and other parts of the city centre, and could accommodate potential land uses including housing, employment, education, sporting, leisure and retail.

**Sainsbury's Supermarkets Ltd** owns and operates a store within the area identified for the Potential Strategic Site. In principle, Sainsbury's supports the identification of the northern part of the city centre as a Potential Strategic Site for mixed use development. However, in line with para. 173 of the NPPF, they would encourage the Council to ensure, at every stage of the Plan's development, that proposals are realistic, viable and deliverable - in the context of an understanding of local economic conditions and market realities.

Any redevelopment/ regeneration proposals should have regard to the need to retain food retailer in the area. As a major landowner, they request to be kept fully informed at all stages. They highlight that Plans which do not respect landowner requirements are unlikely to be deliverable and would therefore fail the tests set out in the Framework.

#### **Other comments:**

- Focus efforts on making Gunwharf the significant regional shopping centre instead of Commercial Road.
- Traditional highstreets unsustainable in the long term.
- It was questioned whether the idea of a city centre, as opposed to just a series of centres or use clusters, is still relevant in the 21st Century.

**Initial Council Response:**

The challenges facing the city centre are acknowledged but there is a clear way forward with the new city centre road proposals seeking to facilitate regeneration of the northern part of the city centre. There is a need to complement this work with an investigation into likely land uses and routes to delivery for new development, likely to include residential, retail, employment and cultural uses both in this part of the centre and the Commercial Road area more generally. The Portsmouth Retail Study set out evidence on the need for retail floorspace across the city but this work needs developing further to provide further detail on the current vision for the city centre and Commercial Road. This work will be informed by the representations made by the main landowners submitted to this consultation but further engagement will be necessary.

The University masterplan needs to be considered given its potential to contribute towards the wider regeneration of the city.

## 18. Cosham Opportunity Area

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22 comments received regarding this topic.

**What do you think about development in the Cosham area? Are there any specific sites we should consider or specific issues we need to address?**

4 respondents (including **Northwood Investors International Ltd (Lakeside)**) directly supported Cosham as a good location for further development. One respondent didn't think the area was capable of supporting further development.

Most respondents made comments on specific aspects of the area as below:

### Opportunity Area:

- Northwood Investors International Ltd (Lakeside) suggests that the Opportunity Area is extended around the train station - it would benefit from public realm improvements and would promote sustainable transport.
- One respondent disagrees that there isn't further potential on Cosham High Street - seek to improve the quality and diversity of the retail offer.
- Extend the Opportunity Area south of the railway line to include Roebuck House and Lynx House.
- Proximity to QA Hospital should be reflected in the development of the area; its future growth needs, signage from the train station.
- Overdue for redevelopment.

### Future Growth:

- High quality development and public realm - focus on character and on-going maintenance.
- Create mixed, sustainable communities.
- Build links between the existing communities and facilities in Cosham, Wymering and Paulsgrove.
- Impact assessment of development needed in conjunction with the growth of the city.

### Housing and Employment

- Increasing the population of Cosham could provide a valuable employee and community base for businesses and supporting uses located at Lakeside (**Northwood Investors International Ltd (Lakeside)**).
- Balance of residential and employment provision.
- Create a separate area away from the high street for employment, residential and commercial facilities.
- Retain employment opportunities.
- Position affordable housing in the area.
- Old Roebuck house building could be created into social housing.

### Community Facilities

- Strengthen as a community.

- Retain community facilities.
- Do not identify the police station and fire station as potential development sites.
- Look to retain services of the PCMI in Cosham, even if relocated.
- Consider where a new health and community centre would be located.

### **Traffic, transport and parking**

- Address High street traffic congestion from the railway crossing.
- Improve public transport facilities.
- Reduce parking fees to encourage shoppers.
- Focus on walking and cycling connection.

### **Retail**

- Balance and improve the retail offer, moving away from betting / charity shops - consider local produce markets.
- Encourage small retailers and cafes.

### **Other comments**

Are the range of Opportunity Areas to replace city centre provision or are the proposals just improvements?

One respondent felt that Cosham has fewer identified opportunities and attention than other areas in the document.

### **Initial Council Response:**

The responses indicate that the centre of Cosham is an area which is broadly considered to be suitable for new investment and development. The boundaries of the opportunity area will be revisited to ensure they are appropriate and we are actively considering the full potential. Further work on considering the approach to retail provision in this centre will also be undertaken, along with an assessment of individual sites in the Housing and Economic Land Availability Assessment.

## 19. North End Opportunity Area

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31 comments received regarding this topic.

**What do you think about development in the North End area? Are there any specific sites we should consider or specific issues we need to address?**

There was some indirect support for making North End an Opportunity Area in the sense that it is overdue for investment and environmental improvements.

They were a few objections. One respondent felt the area is too constrained for significant additional development and another didn't think North End should be a priority.

Others stated that key constraints must be addressed first before additional development.

### Key Issues to Address

- Levels of crime.
- Measures to reduce congestion and address poor air quality.
- Lack of green infrastructure.
- Upgrade of public transport, walking and cycling infrastructure
- Need for an impact assessment in conjunction with the future growth of the city.

### Suggested Uses in the Opportunity Area:

A focus on residential and commercial uses, including suggestions for:

- Improvements to North End and Fratton shopping areas.
- An additional supermarket or more small, independent food retailers.
- Running promotions to fill vacant units and allow changes of use.
- Providing assurances to businesses that the area is a priority for investment.
- Preventing residential development on the frontages of Kingston Crescent or London Road.

Alternatively, concentrate retail in Commercial Road and replace vacant retail with needed green space (**Portsmouth Labour Party**).

**Portsmouth's Tackling Poverty Strategy Steering Group** want to see new development focus on maintaining and improving access to local facilities and to green spaces, as well as avoiding concentrations of businesses that pose risk to health and well-being.

One development opportunity was put forward: the long vacant former Kwik Save in Stubbington Avenue.

### Traffic, Transport and Congestion Suggestions

- Improve public transport provision and link employment sites such as Anchorage Park.
- The Fratton-North End north-south corridor could be utilised for future public transport schemes e.g. Rapid Bus Route.

- Pedestrianise Stubbington Avenue/ Gladys Avenue roundabout to Kingston Crescent, at least during core hours.
- Turn London Road into a Pedestrian Priority Area or public transport only zone - particularly to the south of Stubbington and Gladys Avenues and Angerstein Road.
- **Portsmouth Cycle Forum** suggest rerouting traffic off London Road for a cleaner, safer environment (e.g. off Kingston Crescent and Derby Road, around the back of the new Lidl store).

### **Other Comments**

- The existing library is said to be very successful.
- Don't neglect the older areas of Portsmouth; encourage a sense of pride and belonging.

### **Initial Council Response:**

The responses indicate that this area is suitable for new investment and development but the comments regarding capacity, and air quality, are noted. Further work on considering the approach to retail provision in this centre will also be undertaken, along with an assessment of individual sites in the Housing and Economic Land Availability Assessment. The forthcoming Air Quality impact study will be relevant in helping to understand the future impacts and possible actions.

## 20. Fratton Opportunity Area

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23 comments received regarding this topic.

**What do you think about development in the Fratton area? Are there any specific sites we should consider or specific issues we need to address?**

Most responses focused on specific aspects of the Opportunity Area for improvement.

A few didn't feel that the centre is suitable for significant further development as its too physically constrained, or that the area doesn't need to be a priority - partly due to its proximity to Commercial Road.

### **Key issues to address:**

- Poor, bleak environment.
- Over concentrations of particular commercial uses.
- Poor air quality and traffic congestion.
- Need for an impact assessment in conjunction with the future growth of the city.

**Portsmouth's Tackling Poverty Strategy Steering Group** want to see new development focus on maintaining and improving access to local facilities and to green spaces as well as avoiding concentrations of businesses that pose risk to health and well-being.

### **Opportunity Area Uses**

No residential development on the frontage of Fratton Road.

It is recommended that the Council seek to understand what type of businesses are attracted to the area and work in partnership with Big Fratton Local on the priorities for development.

### **Portsmouth Football Club**

- Relocate to reduce traffic congestion issues (2 comments) and utilise site for social housing.

### **Asda and the Bridge Centre**

- Increase the amount and range of retail uses.
- Focus on local amenities.
- Unattractive, poor quality centre that replaced the original Old Coop and Methodist building - design quality needs to be higher in future.
- Site has potential to add vibrancy to the area if its frontage can be improved.

### **Traffic, Transport and Congestion**

- New development would need sufficient parking.
- Pedestrianisation or pedestrian priority between Arundel Street and Fratton Bridge and reroute traffic.

- Cycling and Walking infrastructure needs upgrading including connectivity to Fratton station.
- Remove through-traffic between Fratton Bridge and Arundel Street by a physical barrier at Selborne Terrace - allow bus access via automatic bollards.

**Other comments:**

- Encourage a sense of pride and belonging; don't neglect the older areas of Portsmouth.

**Initial Council Response:**

The responses indicate that this area is suitable for new investment and development but the comments regarding capacity, and air quality are noted. Further work on considering the approach to retail provision in this centre will also be undertaken, along with an assessment of individual sites in the Housing and Economic Land Availability Assessment. The forthcoming Air Quality impact study will be relevant in helping to understand the future impacts and possible actions. Further discussion needs to take place with parties including the football club on the future of this area.

## 21. Somerstown Opportunity Area

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17 comments received regarding this topic.

**What do you think about development in the Somertown area? Are there any specific sites we should consider or specific issues we need to address?**

There were no objections to focusing additional new development in Somertown. Comments focused on the issues and suggested uses for the area.

### **Key issues to address:**

- Crime levels and the fear/ perceptions of crime.
- The quality of the existing housing.
- Engagement with the local community.
- Community cohesion: **Portsmouth's Tackling Poverty Strategy Steering Group** notes the contrast between scale of new student accommodation and the local redevelopment undertaken to date; new development must benefit all members of the community.
- Need for an impact assessment in conjunction with the future growth of the city.

### **Walking and cycling connectivity:**

- Build upon the close proximity to the city centre.
- Safe and appealing walking and cycling routes. Improve walking and cycling navigability through the area and wider connectivity to the city centre and Southsea (Portsmouth Cycle Forum).
- Improve walking and cycling connectivity along Winston Churchill Avenue and it's north-south connecting routes.

### **Opportunity Area uses:**

- Focus on supporting the University's requirements (2 comments).
- Social housing provision.
- Improvements to existing housing.
- Increased greenspace provision with new development.
- There was a positive comment regarding the Somerstown Community Hub - they would like to see residential upgrades continued in this manner.

### **Development Opportunities:**

- Better use of the Listed Omega Building - increased community and education uses.
- One respondent suggested the relocation of the fire station.

### **Other comments:**

- Encourage a sense of pride and belonging; don't neglect the older areas of Portsmouth.

**Initial Council Response:**

The responses indicate that this area is suitable for new investment and development but the comments , including those regarding student accommodation and improving cycling and pedestrian links are noted. An assessment of individual sites will be undertaken in the Housing and Economic Land Availability Assessment.

## 22. Seafront Opportunity Area

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81 comments received regarding this topic.

### **What do you think about the future of the seafront? What are the issues we need to address and what do you think the Plan should try to achieve?**

Several responses noted the high value of the seafront and surrounding open space as an asset for residents, visitors and wildlife (including health and well-being benefits). It should be reflected as a priority for investment accordingly.

Views were split on the nature, size and scale of development in the identified Seafront Opportunity Area; some felt it is in need of regeneration and more should be done to promote/ enhance the seafront and Portsmouth's tourism industry through high quality new development. Others feel the priority should be to protect the natural environment and its existing character, which would be negatively impacted by additional or 'too much' development.

In terms of existing development, some respondents feel new development has been contrary to the goals of the Council's Seafront Strategy (2013). However positive comments were also received on recent development including: Hot Walls, Southsea Castle, the garden centre on Ave de Caen, Canteen and pier redevelopment.

Other views on development principles included:

- Prioritising the marketing the significant historic and conservation assets.
- Prioritising brownfield sites over greenfield land.
- Make a destination for supporting seasonal businesses.
- Environmentally sensitive development - retaining its 'open' character.
- Ensuring high quality design - sensitive to Southsea's existing architecture.
- Investment in making the seafront a major attraction - e.g. take over and upgrade the piers.
- Not considering this opportunity area for development until all other sites have been completed.
- Work in partnership with all relevant agencies (including sea defence bodies).
- Need for an impact assessment in conjunction with the future growth of the city.

Detailed comments were received on sea defence, transport and biodiversity issues:

### **Sea defences**

A significant issue for a number of respondents in the consultation, many of the comments related to their design with respondents highlighting that more detail was desired on their design, and that the flood defences are unpopular as they remove the seafront view and the Common itself. Others felt that they need to be robust but in keeping with the historic environment, whilst also attractive to tourists. Furthermore:

- Seafront defences should be incorporated into the seafront masterplan.
- Protection against floods should be reasonable and proportionate to the likelihood of flood risk.
- Alternative 'soft engineering' solutions should be fully investigated.

- Incorporation of sustainable travel modes. Defence design should include a mixture of pedestrian/cycle routes to be used as an opportunity for increasing active travel along the seafront.

## Transport

- Improve the connectivity of the seafront with the wider city to allow all residents to benefit from the coastal space.
- Encourage more sustainable travel around/to the seafront.
- Better walking and cycling routes from the city centre, Gunwharf, Central Southsea, the Eastern Road and the train stations to Eastney beach.
- Infrastructure to encourage active travel will cost much less to maintain than other methods of public transport.
- High quality cycle infrastructure should be put in along the length of the seafront.
- Should try to limit the amount of additional cars from tourists.
- No capacity to accommodate any new development to the east of the area.
- Southsea parking limitations.
- Make it safer to use the Hayling Ferry, both on foot and for cycling, by enforcing the 20mph limit (or using suitable traffic calming methods).
- New cycle lanes are dangerous and should be removed.
- The roads infrastructure is detrimental to the local environment and wildlife.

## Biodiversity/ Natural environment

A few respondents raised concerns regarding the natural environment and biodiversity of the seafront area. **Hampshire & Isle of Wight Wildlife Trust** made the following points:

- The seafront is an important area for recreation and wildlife.
- Several sites along the seafront are included as part of the core/primary network for overwintering waders and brent geese and the sea defences support the only regular overwintering flock of purple sandpiper *Calidris maritima* in the county. Eastney Beach and the coastal vegetated shingle habitats present are of international importance and Dartford warbler and black redstart are known to breed at Eastney and around the former QinetiQ Fraser battery site.
- Any proposals should be developed in conjunction with mitigation and management strategies which are informed by robust ecological information.
- Proposals should look to protect and enhance the natural environment delivering net gains in biodiversity, where possible.
- Any proposals should look to provide long term recreation and SINC management strategies.

The **RSPB** also made several points:

- Given the proximity of the Opportunity Area to Langstone Harbour SPA / SSSI in the east and several important areas of supporting SPA habitat providing Brent Geese feeding habitat we have serious concerns regarding impacts on the designated features of the adjacent wildlife sites from possible developments in this area.
- The significance of Langstone Harbour SSSI/SPA designation and its supporting habitats needs to be acknowledged and impacts appropriately assessed.

- Appropriate screening of the Qinetiq site as part of the Habitats Regulation Screening Assessment and the need for further assessment must be recognised in the Local Plan.
- At the next stage of the emerging plan, we would anticipate a comprehensive analysis of the emerging development proposals (including any mitigation) as part of a robust draft HRA and any sites which fail to meet the legal tests as set out in the Habitat Regulations would need to be removed from the plan.

One member of the public suggested extending the promenade to Eastney Point to include the natural environment and the setting of Fort Cumberland. Two respondents suggested that the seafront should be considered as an essential 'blue lung' for the city.

### **Opportunity Area**

- It is important to maintain the distinctive characters and identities of each area so that the city is legible.
- The city centre with the Harbour Waterfront should not be grouped together as they have very different economic functions. Remove Portsea from the city centre boundary and re-define as part of the 'Harbour Waterfront' area together with the Historic Dockyard and Gunwharf Quays.
- The Wightlink Ferry terminal, BAR Racing, the old fishing harbour and the seafront down to Clarence Pier form a natural grouping.

### **Opportunity Area Uses**

A summary of uses suggested:

- Retain the approach in the existing Seafront Strategy (2013).
- The Common should be utilised for events and needs more toilets to support it.
- More community space and provision for local people.
- Provision for more cafes, bars, shops and stalls, leisure venues, venues promoting exercise, more to attract families.
- More facilities are needed at the eastern end of the seafront.
- That the area is unsuitable for any residential development.

**Barton Willmore** believe that the seafront presents the opportunity to reshape Portsmouth's image. The area should be more fully utilised for tourism, hotels and sports facilities. To achieve the vision for the city, Portsmouth should develop linked tourism activities along the seafront with new places to live, work or visit, in combination with selective redevelopment and regeneration.

### **Specific Sites**

The Plan shouldn't focus on particular named sites for housing in this area; add 'plus other sites' in the text.

A couple of responses related to South Parade Pier and reflected similar desires for new uses as above, including more restaurants/bars, and future development that aspires to create a diverse seafront that is not only arcades and low quality food establishments but has more, high quality commercial and food/drink uses.

A few requests for the removal or redevelopment of the Pyramids Leisure Centre site, as either an improved facility, luxury hotel or an open air lido.

Protect Eastney beach as a nature reserve; refuse any further commercial development.

Several comments were received regarding the Fort Cumberland site and surroundings, and the need for affording it greater protection and enhancement. Suggestions included:

- Protect and develop as a heritage tourism attraction. One respondent suggested that the Royal Armouries could be re-sited here also.
- Open up its main frontage by the demolition of the QinetiQ Trials Site.
- Reopen the original entrance and expand to encompass the SINC adjoining it, in order to conserve/enhance the historic environment and heritage assets of the area.

### **Fraser Range and Eastney Caravan Park and adjacent SINC**

The Issues and Options consultation process itself was the subject of a few comments. One respondent expressed dissatisfaction because they felt that the consultation was misleading. Two other members of the public were dissatisfied because the consultation did not directly address the details of any proposed housing development at Fraser Range or the caravan park and that such plans are not obvious on the website and at the exhibitions. It was felt work needs to be done to ensure local residents' views are considered.

### **Objections to new development**

31 respondents voiced objections to, or concerns about, any potential development proposals for the Fraser Range site, Caravan Park and car park adjacent to the SINC - specifically a reported proposal for 300 dwellings. The most common objections were on the following basis:

- Conflict with the principles of the Seafront Masterplan SPD (2013).
- Perceived existing lack of services, facilities or infrastructure capacity impeding its capability of accommodating any new development (including sewerage, schools, roads, health services and shops) with more vehicles associated with new development adding to current congestion issues.
- New development disturbing contaminated land in the area (pollutants including heavy metals and asbestos).
- Coastal and surface flood risk, partly as a result of the increase in impermeable land from new development.
- Negative impacts of development on the Fort Cumberland Scheduled Monument.
- Loss of the caravan park; a valued low-cost tourism facility.
- Negative implications for the natural environment, biodiversity and protected species including:
  - Permanent loss of open green space that is already limited (and its well-being benefits).
  - Impacts upon bird migration routes and upon protected species such as Dartford Warbler, bats in derelict buildings and other flora/fauna.
  - Environmental impacts from additional vehicles inc. air pollution.
  - Impacts on designated areas including the SINC and nearby RAMSAR and SSSI sites.
  - Compromised access to the seafront as a 'blue lung'.

Other comments included:

- Housing or large development in this location is inappropriate and inconsistent with sustainable development principles.
- Overcrowding in the city from additional homes, increases in anti-social behaviour and other negative social problems.
- Any new housing built in the area would outprice those who need housing most.
- Impacts on the views from existing homes.
- Conflict with the Council's duty to provide and protect recreational and specified areas for the residents and visitors and to protect open space important for community health and well-being, education and biodiversity.
- Doubt over whether the HRA recommendations would protect wildlife, particularly in the SINC.
- Financial implications of land remediation and CIL requirements. Should consider sites that are more affordable to develop and more appropriate for potential residents, especially off the island.
- The SINC/car park are used daily by a variety of people.
- Loss / relocation of the nudist beach.
- Consultation is needed with organisations such as the RSPB, about the level and nature of development that could be achieved while sustaining the habitat.

The Plan should look at maintaining and enhancing public transport in the area (which was felt to be limited in some areas) and reduce its impact upon the environment. It was noted that there are issues on local roads with blind spots, speeding and parking in the local area, particularly Eastern Road, Bransbury Road, Henderson Road and Fort Cumberland Road. Cycling along Fort Cumberland Road can also be treacherous.

Alternatively, a number of responses made suggestions for uses for the area:

- Green space - returned to a natural setting/ redevelop as a nature reserve. Would also enhance the setting of Fort Cumberland.
- A focus on health and wellbeing, education, the creation of business or creative workspaces.
- Limit to affordable or semi/detached housing.
- Mixed use scheme with high quality designs and additional family homes.
- Mixed residential and hotel site.
- Office facilities in combination with a small solar farm.
- Luxury flats with sympathetic grounds to improve the area.
- A public park with the car park retained.
- Future development of the Caravan Park should be restricted to low rise.
- Residential amenity of Centurion Gate should be protected and/or enhanced by any new development.
- Development should be environmentally sustainable.

One individual responded to say that they welcomed development/ thoughtful investment because the site is currently poor quality and dangerous, impacting negatively on the wider area. Five respondents suggested that Fraser Range should be a strategic site in the plan but not necessarily for housing primarily, but that the area was in need of better transport links to encourage new development.

## **Other Comments**

- New housing should be located off the island or at the northern end of the city, where there is easy access to major trunk and motorway routes in/out of the city.
- Consider the impacts of new and permitted student housing on freeing up private housing on the housing needs of the city.
- Council should work with community, wildlife and cultural bodies to protect the coastal area.
- The quality of the housing in Eastney is poor. Potential for small scale new housing in the Henderson Road area.
- Eight respondents felt the Council should resist the housing targets being imposed on them by the government as they are not feasible for the city.
- The seafront masterplan should focus on ensuring that existing wildlife habitats, housing and businesses are protected from over-urbanisation.

### **Initial Council Response:**

Responses to this broad area covered a wide range of issues, reflecting in part the differing nature of various areas.

The comments regarding the ability of the seafront to be a stage for social, cultural and recreational events and activities are noted. One key consideration for the Plan going forward is to ensure that this is reinforced and enhanced in the future while retaining important qualities, including the character and nature conservation value of the area.

The ecological value of the seafront and neighbouring areas will need to be recognised and responded to in the new Local Plan. Work on green infrastructure, the Sustainability Appraisal and the Habitats Regulations Assessment will need to address this.

Fraser Range and the Caravan Park were not the specific subject of consultation in the Issues and Options document because the sites had not been identified as having the potential for 250 homes - the threshold used for a strategic site. The comments received in this consultation are however helpful in highlighting relevant considerations for the future of these areas. Further work will be undertaken to understand these constraints as the Plan progresses.

## 23. Other Strategic Sites and Areas of Opportunity

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25 comments received regarding this topic.

### Have we identified all the potential Strategic Sites and Areas of Opportunity? What others should we be looking at?

Three respondents thought that the consultation document identified all the potential strategic sites and areas of opportunity. Two respondents stated no more areas should be considered, due to lack of space and inadequate infrastructure.

#### Current Sites:

One respondent thought that the city centre is understated as a housing opportunity.

**Milton Neighbourhood Forum** and one other respondent questioned the inclusion of St James' Hospital and Langstone Campus, which should not be considered a strategic site as it is too remote from public transport and there is insufficient capacity for sustainable development.

Two respondents questioned the suitability of identification of the seafront.

#### Other Specific Sites/ Uses and Areas of Opportunity:

Respondents mentioned specific sites for consideration, including the dockyard, the University area, The Hard (including Brunel House), Frasers Battery in Eastney, and the area around Airport Service Road.

Three respondents highlighted the northern part of the island, specifically Hilsea as a broad area, with one mentioning Hilsea Station as a specific site. Others mentioned areas off Portsea Island - Paulsgrove, Drayton, Farlington and Portsdown Hill.

One commented that the document should identify sites for schools, cemeteries and allotments.

#### Other Comments:

One respondent found the consultation difficult to respond to and struggled to find the plan on the Council's website.

#### Initial Council Response:

Given the evidence of need for housing, employment and other uses it is proposed for further work and investigation to be undertaken in investigating the potential of these other suggested areas to deliver development. Hilsea, Buckland and Paulsgrove in particular should be re-examined because of the level of interest and the position of the Council as a significant landowner.

The wide ranging nature of the comments regarding the seafront are thought due in part to the different characteristics of various parts. Further consideration will be given to whether this area represents a "broad area of opportunity" or instead should be thought of in a different way. It is thought that St James / Langstone should continue to be considered as a potential strategic site. The suitability and deliverability of the site, and the appropriate mixture of uses, will be determined through the ongoing work outlined in the response to comments made in section 13.

## 24. Any Other Comments

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### Do you have any other comments or suggestions on matters not covered by the consultation questions?

A range of general issues/concerns were highlighted in the 'other comments' section such as follows.

#### The Local Plan's Strategic Approach to Development

- Portsmouth's planning needs to be considered carefully, overdevelopment will detract from the city's appeal.
- The plan does not creatively investigate the real potential of our claim to be "The Premier Waterfront City".
- The aim of being an attractive waterfront city, welcoming visitors to strengthen its economy, appears to be in conflict with the aim of encouraging a huge building programme and population growth in an already overburdened city.
- The strategic context (paragraph 2.1) should include a section on flood defences as one of the major issues for the planning period.
- A policy framework should be generated at Local Government level and not more remote organisations who cannot appreciate all the issues.

**Portsmouth Cultural Trust** felt that places continue to succeed despite changes in economic conditions because their built form is highly adaptable. A good cultural quarter should be authentic but also innovative and changing.

**Havant Borough Council** expressed their commitment to continuing to work with Portsmouth City Council regarding landholdings that the Council owns in Havant Borough. It is highlighted that this land portfolio offer has already provided significant development, most notably at Dunsbury Park. As well as optimism expressed for continuing a positive working relationship regarding positively planning for the future of the Solent area so that the challenges of housing need and affordability to the benefit of future generations can continue to be addressed.

In their response, **Landsec (Gunwharf Quays)** considered that there were other matters to take into account when considering the city's overall growth strategy including:

- The importance of accommodating other main town centre uses (such as offices, leisure and hotel) in the correct locations, particularly in the city centre.
- The need to ensure that transport considerations are taken into account when assessing alternative growth options in the new Local Plan.

Landsec also suggests that Opportunity Areas may be able to come forward for (re)development before the 6-15 year timeframe stated in the issues and options document. In addition, that Strategic Development Sites and Opportunity Areas should be given the same weight and status in terms of allocations and strategy in the new Local Plan. Furthermore they considered that there is merit in extending the proposed opportunity area boundary for the city centre southwards to cover the ferry terminal and BAR Racing areas.

## **Constraints in the city**

Several respondents, including the Milton Neighbourhood Planning Forum, highlighted concerns that the Council was planning for development without appropriately considering the current constraints in the city first, and that the island presented limited opportunities for further intensification.

- Infrastructure must be in place first in order to meet the aims of the Local Plan.
- Development should not overload the city's infrastructure and new infrastructure should encourage sustainable transport.
- Plan does not address the strategic implications of changes in population nor the anticipated increasing demands of the future population.
- The student population is too large.
- Financial incentives from new development are not sufficient to outweigh their impacts.
- "The city does not have the room to grow its way out of its current problems".

One respondent considered that "the fundamental decisions have already been made about the quota of new homes, jobs, and retail and it's just a case of fitting them in as best we can, which is the Local Plan's job."

## **Meeting needs of current residents**

Another common theme arising in the responses to the 'other comments' section, was that of the need for the Plan to meet the needs of current residents. Two responses, for example, specifically stated that the plan needs to be written for the benefit of existing residents rather than as a development opportunity for the property industry. Other points raised highlighted the need to address current issues for local people including poor health, lack of education, lack of affordable housing, high unemployment, congestion, parking, poor housing quality, low wages, lower life expectancy, general quality of life and challenges stemming from the expanding university. Redevelopment in the opportunity areas should focus on the people; local residents need somewhere within walking distance to work, to live, to relax.

Other comments highlighted that the Plan needs to solve issues of lacking infrastructure, lack of schools, healthcare services, and community centres, as well as trying to improve the environment and prioritise the cultural and historical aspects of the city; in order to support building more houses.

One member of the public had some particular comments about the Cosham area stating the need for more leisure uses on the High Street and a better lit/safer route from the High Street, through to Wooton Street via the community centre to reduce crime.

In terms of waste related concerns it was suggested that the recycling offer by Portsmouth City Council needs to improve. The city should be kept clean with fly tipping, litter and dog mess addressed.

## **Education**

Education and school provision was touched upon by a couple of respondents with one member of the public observing that "none of the strategic sites offer new school provision as a suitable option".

The **Education & Skills Funding Agency** stated several points:

- "One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments."
- "The next version of the plan should make clear the proposed funding mechanisms for how infrastructure required to support new development will be delivered, with cross-reference to the IDP and other evidence as appropriate. Such evidence should explain the basis for pupil yield calculations and the costs of delivering school places for both expansions and new schools, including special educational needs provision."
- "Paragraph 7.6 states that Development Management policies will cover the key priorities for developer contributions, though education is not specifically identified among the types of infrastructure listed. The ESFA recommends an overarching strategic policy on Infrastructure Delivery to support the growth set out in the plan."

## Transport

There were a number of issues raised relating to transport considerations such as:

- Consideration of a city wide residents parking scheme.
- Traffic on Queen Street getting worse.

There were some conflicting views regarding public transport with one resident remarking that public transport, specifically buses, are unreliable; whilst another expressed that the bus network is a positive and should be kept going. A couple of other points were raised relating to public transport:

- The bus lanes next to moneyfields allotments should be protected to avoid 'rat run' links forming.
- Investigate making the Lakeside area easier to get to via public transport.

A couple of individuals raised concerns over air pollution in this section, with one respondent raising concern over the potential for more housing leading to more traffic and therefore air pollution.

## Housing

There were some issues raised regarding housing provision in the city including that there was simply too much housing being built on Portsea at present.

The **Portsmouth Labour Party** gave support to their affordable housing plan making the following specific points:

- Use council resources to build local affordable housing.
- Enforce affordable housing requirements on private developers.
- Make new student housing/accommodation contribute towards affordable housing.

**The Portsmouth & District Private Landlords Association** consider that the continued negativity towards HMO's and the resistance to many new developments hinders the city as a whole and discourages the refurbishment of individual properties which is required if whole areas are not to fall into dereliction.

## **Working together**

A couple of points were made about the need for the Council to work with other organisations during the plan-making process particularly the University and the Milton Neighbourhood Forum.

The **Portsmouth Cultural Trust** expressed support for the development of the Local Plan as did several others.

One member of the public expressed that there should be a diagram illustrating the hierarchy of decision-making and explaining how the plan fits into wider government and sub-regional strategies (e.g. NPPF, SSPS and SEP).

Another respondent felt there should be a mechanism for updating the document based on new data during the Plan's life.

Three respondents expressed the desire to see the feedback from the consultation with a paper summarising the findings from the Issues and Options Consultation and how these will influence the process.

## **Issues and Options consultation**

A number of consultation responses related to the Issues and Options consultation documents. Whilst the Portsmouth Society commented positively on the document writing that it was "A well written and presented document, and the glossary is very helpful." Amongst other respondents there was some feeling that it had been difficult to engage with the materials that the Council had produced for the consultation. One respondent felt that there was too much information scattered throughout the documents making it difficult to provide a structured response. Whilst another expressed the opposing view that the Issues and Options document was too vague for comment at this stage.

In terms of the content itself, one member of the public expressed dissatisfaction with the Issues and Options document and commented that "Actual figures for housing, employment and retail are not given until section 5 and 6, under 'Strategic Options for Growth' and Strategic Development Sites and Opportunity Areas for Growth. The first forty pages are just a systematic list of issues to be covered."

Another response indicated that they felt people should have been directed to read the Sustainability Appraisal Scoping Report first.

A couple of respondents raised issues over the accuracy of some of the data underpinning the document as the following comments suggest:

- Friends of Old Portsmouth Association stated that "It is evident that the survey data, particularly relating to retail, is out of date and that perhaps this information needs reviewing and updating for inclusion in the next draft."
- Another respondent stated that the data relating to retail and flood defences used in the document is out of date.
- Whilst another posed the correction: the dockyard is not the largest employer in Portsmouth, the NHS is.

## Issues and Options consultation process

Several respondents have expressed thanks for having the opportunity to comment and to make suggestion regarding the new Local Plan. However, at least six respondents commented that they felt the Issues and Options consultation had not been publicised enough or for too little time for such a lengthy document. One of those respondents concluded that "this has created a feeling that the Council is indifferent to the views of the people who live in the city."

Issues were also raised regarding the accessibility of the consultation process and more specifically the online elements. One member of the public wrote that they felt the website to be poorly designed and difficult to complete.

The online survey was referenced as a source of difficulty for at least three respondents when trying to respond to the consultation. A couple of these comments related to the requirement for having to complete the survey form in one go, rather than being able to save it along the way and fill it out in multiple sessions before submitting it. Furthermore two comments highlighted concerns that the survey questions would steer consultation responses down a particular direction or towards a narrow set of issues rather than encouraging wider dialogue around the issues.

**Friends of Old Portsmouth Association** expressed that "There should have been ample opportunity to dedicate forum meetings and focus groups to this subject and have meaningful face-to-face exchanges of ideas." They expressed hope that in the next rounds of consultation over the new Local Plan, this will happen.

### Initial Council Response:

These comments cover a wide range of issues which will be reflected upon as the Plan progresses. Regarding the consultation arrangements, in total, 300 persons attended the exhibitions and consultation responses were received from 363 individuals, businesses and organisations, which is considered a reasonable outcome. However, there may be ways in which future consultations can be conducted to improve this outcome and the Cabinet report sets out some initial thoughts on how this could be achieved, which will be reflected on by officers.

Regarding the consultation materials themselves, there is always a balance to be achieved between giving parties information to inform their responses, and (particularly in the case of individuals and others considering the consultation in their spare time) overloading people. The rationale of the consultation was that the Issues and Options document itself had sufficient information to cover the wide range of subjects in the Local Plan, with additional, more detailed information available in the supporting material, should people wish to access it and comment upon it. During the consultation itself, officers handed out summary leaflets at exhibitions, and the exhibition materials (which summarised the consultation) were placed online to provide people with a shorter summary. A few respondents to the consultation did however comment that they found the material difficult to access. While overall it is thought the approach used was appropriate for the consultation, future rounds could make use of additional accessible materials focussed on key issues.

## 25. Comments on Other Documents

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14 comments were made on this topic.

### Do you have any comments regarding the other supporting documents?

#### Draft Sustainability Appraisal Scoping Report (March 2017)

One party considered the document contains some useful base data, but questioned why there were no plans to increase numbers of electric charging points, no data on vacant housing stock, or plans to improve accommodation space in new dwellings and reduce deprivation. The following suggestions were made for amendments to the Sustainability Framework:

- SA7 Conserving and enhancing the historic townscape. Needs firmer indicators, suggest: No listed buildings, tall buildings or developments in Conservation Areas will be permitted unless they positively preserve or enhance the area. Further supporting evidence should be provided.
- SA8 Requiring good urban design in Portsmouth. Suggests that PCC produce a guideline for architects and developers which they must have consulted before submitting designs. This document would state that good innovative designs, respecting their site, are preferred and poor or bland designs are likely to be refused (Mentions Greetham Street student accommodation).

The **Portsmouth Tackling Poverty Steering Group** has made comments regarding how social issues are stated in the SA and has offered to discuss potential indicators that could help to demonstrate appropriate objectives. It also highlights the role Section 106 legal agreements can play in delivering benefits for the city and encourages their use in targeting deprived areas and groups.

**Portsmouth Cycle Forum** suggested sustainability objective SA7 should contain the word 'safe' within it, and raised the following detailed points on the Promoting Sustainable Transport in Portsmouth section:

- The document should talk about enabling rather than encouraging cycling and recognise the age of the census data used and make more use of other sources, such as outputs from cycle counters and potentially make outputs public to encourage cycling. This data could also be used for monitoring progress (p27).
- 2016 road casualty data for cycling will be available circa October 2017 and should be added to future documents (p33).
- Question the mention of the Cycle Defect Rectification Scheme which implies cyclists are not sensible road users. There should be data from Hants Constabulary close pass operations in the city to highlight the danger cyclists face on a daily basis from motor vehicles (p34).
- Limited highway space should not preclude reconsidering the potential for segregated routes for the benefit of all users, particularly as safety is identified as a deterrent to cycling (p35).
- Should reference the recently published Cycling and Walking Investment strategy from the DfT (p38).

**Initial Council Response:**

The SA is a key part of the Local Plan process. It is anticipated that further specialist advice is required to assist in this work as the Plan progresses to ensure the Council's responsibilities in this area are fulfilled. Responses made to the Interim SA document will be discussed with those specialist advisers and inform the way forward.

**Interim Sustainability Appraisal (SA)**

One respondent stated the SA implies the recreational stresses on the coastal sites can be mitigated which they disagree with. Another considered the SA does not address the costs of the social and environmental impacts of development- it merely identifies them and should appraise those costs (e.g. health costs) in the same way as economic viability.

One respondent stated no mention is made of the Fort Cumberland SINC adjacent to Fraser Range, and outlined previous acknowledgments of the biodiversity of the site.

**Portsmouth Cycle Forum** made the following detailed points regarding the assessments of Transport Options:

- Point 4 – Climate Change – should recognise active travel and the role they could play in reducing emissions given further priority.
- Point 5 – High Quality Homes – should recognise that new homes increase parking requirements, and there should be a minimum off road parking requirement for all new developments.
- Point 9 – Natural Environment - questions how will PCC ensure there are a higher proportion of electric vehicles? Will this be a stronger part of the parking standards?
- Appendix A: Key Sustainability Issues – Transport: None of these items relate to transport, and are in fact a cut and paste repeat of the retail sections which appear immediately above it.

**Initial Council Response:**

The SA is a key part of the Local Plan process. It is anticipated that further specialist advice is required to assist in this work as the Plan progresses to ensure the Council's responsibilities in this area are fulfilled. Responses made to the Interim SA document will be discussed with those specialist advisers and inform the way forward. Regarding the final point on transport, the comments are agreed. Appendix 1 of the Interim Appraisal SA document sets out the sustainability issues identified in Part 2 of the SA Scoping Report. In the case of transport, the main issues have been taken from the wrong part of the report. The key sustainability issues identified for Transport in the Scoping Report are as follows -

- 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.

These issues were used to form the Sustainability Objectives which were published in the Scoping Report and Interim Appraisal and have been included in this consultation. Therefore it is considered that the consultation has provided people with the opportunity to comment on this aspect. Future iterations of the SA will include reference to the correct transport issues.

## Habitats Regulations Assessment (HRA)

The **RSPB** considered the HRA screening report appropriately recognises the need to consider supporting habitat and, along with **Hampshire and Isle of Wight Wildlife Trust**, noted the Solent Wader and Brent Goose Strategy, which is being updated, will provide greater clarity on the importance of sites, which will be an important tool for informing the emerging Local Plan and HRA.

In addition, the RSPB noted the Solent Recreation Mitigation Partnership definitive strategy is near finalised and should be available for consideration as part of the emerging Local Plan and draft HRA.

One respondent commented that a map of potential residential sites is too high level on which to comment. Specific addresses should be provided.

A respondent disagrees that the recreational stresses on the coastal sites can be mitigated - consider the HRA to be flawed because it implies a developer can make a financial contribution to mitigate environmental damage.

### **Council Response:**

The HRA is a key part of the Local Plan process. Progress made in initiatives such as the Solent Recreation Mitigation Partnership definitive strategy will be useful in taking the work forward, but it is anticipated that further specialist advice is required to assist in this work as the Plan progresses to ensure the Council's responsibilities in this area are fulfilled.

## Statement of Community Involvement (SCI)

One respondent considered the consultation process is not made easy for the person in the street to contribute.

**Portsmouth Cycle Forum** suggested the Council consider how on-street notices are used to encourage more public engagement in planning decisions, that the statement should include details of how to sign up to the planning application mailing list, and the SCI should outline the role of travel plans, the obligations developers have under them, and the engagement that should be encouraged between developers re travel plans.

### **Council Response:**

Comments regarding the arrangements for planning applications have been passed to colleagues in Development Management for consideration as and when the Statement of Community Involvement is reviewed. Overall it is considered the lack of responses here mean that measures are broadly supported, but there are ways in which Local Plan consultations can be improved. Some initial consideration of how the Local Plan consultations were undertaken, and the outcomes of that consultation, will be reported to Members for consideration.

## Authority Monitoring Report

Document contains useful base data, but should have been published earlier and better monitoring indicators could be used to judge progress.

### **Council Response:**

Some of the comments here are acknowledged. It is intended that future monitoring reports are published as soon as possible after the year end. The next monitoring report is being prepared and the selection of monitoring indicators will be reviewed as part of preparing that document and the

### **General comments on consultation**

One person considered many of the supporting documents should not have been part of the consultation as they are less relevant for most people.

Two respondents noted that existing adopted Supplementary Planning Documents (SPDs) were listed in the consultation document but were not included and no reference given as to how to find them.

### **Council Response:**

The intention was for the Issues and Options document to provide sufficient information for people to be able to respond to the consultation, with additional information available on particular topics, such as housing and sustainability, should people wish to read in further detail. The adopted SPDs were on the Council website and were not part of the consultation. However, comments raised here about making all materials easier to find will be taken on board when future consultation documents are prepared.

## Index of Consultation Respondents

The following table sets out the names of individuals and organisations who responded to the consultation. A respondent number has been assigned to each respondent to assist in administering the responses. The purpose of the table is to enable respondents to find where their points have been summarised in this document.

Respondent ID No	Name / Organisation (if applicable)	Topics Commented on
IO 01	M. Birchmore	1
IO 12	R. Coghlan	1, 3, 4, 13, 14, 17, 18, 19, 20, 22, 23, 25
IO 24	J. Meade	1
IO 25	P Clark	1
IO 26	L. Farmer	1
IO 31	J. Brown	1
IO 32	S. White	10
IO 37	C. Bradshaw	4, 15, 16, 18, 22
IO 46	O. Robertson	1, 2
IO 50	H. Gill	1
IO 52	J. Galloway	1, 2, 3, 5, 6, 8, 10, 12, 13, 14, 15, 18, 19, 22
IO 54	S. Thomas	1, 2, 3, 4
IO 56	R. Emery	1, 2, 3, 4
IO 57	S. Potter	1, 2, 3, 4, 5, 6, 10
IO 59	S Rudra	1, 2, 3, 4, 5, 6, 7, 10, 13, 14, 15, 16, 22
IO 60	K Bailey	1, 2, 3, 4, 5, 6, 7, 8
IO 62	C Birkby	1, 2, 3, 4, 5, 6, 9, 10, 17, 22
IO 65	R. Kiddle	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 22, 24
IO 66	K. Bailey	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 16, 17, 21, 22
IO 74	C. Lawrence	1
IO 75	C. Barber	1
IO 76	J. Cullen	1
IO 77	Paulsgrove Residents Association	1, 2, 5, 6, 9, 10, 13, 14, 16, 18
IO 82	P Pattington	1, 2, 3, 4, 5, 6, 8, 9, 10, 13, 14, 15, 16, 22, 25
IO 83	A Henderson	1
IO 85	J. Bateman	1, 2, 13, 14
IO 86	D. Smith	1, 2, 3, 4, 5, 6, 7, 8, 10, 13, 14, 15, 16, 22, 24
IO 87	C Wood	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25
IO 88	I Walker	1, 2, 4
IO 90	P Harling	1
IO 93	E. Harry	6, 10
IO 94	P Higgins	13, 15, 25
IO 95	S Harry	2, 15, 17
IO 96	M Ball	2, 10, 22, 24
IO 97	A Barnes	1, 2, 4, 13, 15, 22, 24
IO 98	R Barnes	10, 15
IO 99	D. Dron	1, 2, 3, 24
IO 100	L Hilborne	1, 2, 8, 24

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IO 101	P Daly	15
IO 102	K Baker	1, 15, 17, 24
IO 103	V Chatwin	13, 14, 18, 24
IO 105	A Griffin	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 12, 13, 14, 15, 16, 17, 20, 22, 23, 24, 25
IO 106	R Ellcome	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23
IO 107	P Higgins	1, 2, 4, 15, 17, 23
IO 109	N Hicks	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 14, 15, 16
IO 110	Theatres Trust	1, 5
IO 113	R Bailey	22
IO 117	K Pitt	2, 3, 4, 5, 6
IO 118	G Curtis	1, 2, 3, 4, 5, 6, 7, 8, 10, 13, 14, 15, 16, 17, 21, 22, 24
IO 119	J Holt	10, 24
IO 120	D Dod	2, 4, 6, 7, 10
IO 121	C Gregory	4, 10, 11, 24
IO 122	C Corkery	2, 13, 15, 24
IO 123	Portsmouth Labour Party, GMB	2, 8, 19, 24
IO 124	M Johnson	1
IO 125	R Stanley	24
IO 126	S Boden	24
IO 127	Anon	1
IO 129	B Harmer	6
IO 131	POSOL	1, 14, 24
IO 132	R Cady	1, 2, 3, 4, 5, 7, 10, 17, 22
IO 134	M Mansfield	15, 24
IO 135	B Mansfield	24
IO 136	M Hunt	1
IO 137	J Skila	1
IO 139	J Bailey	1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 15, 16, 17, 22, 24, 25
IO 140	S McLean	1
IO 141	K Pitt	2, 6, 10, 13, 14, 15, 16, 20
IO 144	P Rimmer	2, 3, 4, 5, 6, 7, 13, 14, 15, 16, 17
IO 145	L Turner	1, 2
IO 147	RAPS (Residents Association of Port Solent)	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25
IO 148	M Grice	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24
IO 149	T Pearson	11
IO 151	P Grunchy	11
IO 152	K Jordan	1, 2, 3, 4, 8, 10, 13, 14, 15, 16, 17, 22, 24
IO 154	R Hudson	1, 2, 3, 4, 5, 6, 7, 8, 9, 10
IO 155	T Bridgen	1, 2
IO 157	A Venables	1, 2
IO 158	PDLA	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 22, 23, 24
IO 159	Anon	1, 2, 3, 4
IO 160	H Jamieson	22

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IO 161	D Hawkins	22
IO 163	R Hussey	22
IO 164	D Reid	22
IO 165	C Shek	22
IO 166	R Blackmore	22
IO 167	H West	22
IO 168	J Ramadan	1, 2, 4, 9, 13, 14, 15, 16, 17, 20
IO 169	L Clifton	22
IO 170	D Reynolds	22
IO 171	D Bendel	2, 4, 5, 6, 8, 9, 10, 15
IO 172	Butterfly Conservation	9
IO 173	P Pattington	2, 3, 10, 22
IO 174	Winchester City Council	2, 11
IO 175	Hampshire & Isle of Wight Wildlife Trust	1, 6, 8, 9, 11, 12, 14, 15, 22, 25
IO 177	N Scarlett	2, 9, 22, 24
IO 178	C Langan	22
IO 179	R Langan	22
IO 180	J Thompson	22
IO 181	J and S Dungworth	22
IO 182	K Mansfield	22
IO 183	Forman Homes Ltd	1, 2, 23, 24
IO 184	C Fogden	8
IO 185	B Stancliffe	22
IO 188	P O'Hara	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24
IO 189	Portsmouth Cultural Trust	3, 5, 7, 24
IO 193	J Micheletta	1
IO 195	A Khopkar	2, 3, 4, 7, 8, 10, 22
IO 198	Tetlow-King Planning	2, 24
IO 199	J Lloyd	2, 3, 4, 7, 8, 10, 22, 24
IO 201	J Bateman	2, 3, 4, 7, 8, 10, 22
IO 202	Sport England	1, 6, 15
IO 203	L Prowse	1, 2, 3, 4, 5, 7, 8, 13, 14, 15, 16
IO 206	T Halloran	1, 2, 3, 4, 5, 7, 8, 10, 11, 22, 24, 25
IO 218	K Knowlson- Clark	2, 3, 4
IO 220	C Seek	1, 2, 3, 6, 7, 9, 10, 11, 12, 24
IO 221	Milton Neighbourhood Planning Forum	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 22, 23, 24, 25
IO 238	I Townley	2, 4, 13, 14, 15, 16
IO 239	O Stone-Houghton	1
IO 240	D Ware	1, 2, 4, 10, 15, 22
IO 243	National Landlords Association	2, 3, 10
IO 244	K Wallis	2, 3, 4, 7, 8, 10, 22
IO 245	M Organ	2, 22
IO 246	P Organ	2, 22
IO 247	J Butterworth	22
IO 248	M Doyle	15
IO 249	Southern Water	10, 11, 13, 14, 15, 16, 17, 24
IO 251	Portsmouth Green Party	1
IO 255	N Scalett	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 15, 17, 22, 23,

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		24, 25
IO 256	P Pritchard	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 22
IO 257	Public Health Portsmouth City Council	1, 2, 6, 8, 10, 22
IO 258	P Pritchard	1, 2, 3, 4, 6, 9, 10, 11, 13, 14, 15, 17, 18, 19, 20, 22
IO 259	M Froggatt	1, 2, 3, 4, 8, 10, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22
IO 260	A Gill	1, 2, 6, 10, 12, 15, 22, 24
IO 261	P Docking	2, 3, 6, 10, 11
IO 263	L Nicholas	1, 2, 3, 5, 6, 8, 10, 11, 15, 24
IO 264	K Rimmington	1
IO 265	K Rimmington	1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 13, 14, 15, 17, 18, 19, 20, 22
IO 266	H Stainton	2, 4, 7, 9, 10, 11, 15, 18, 19
IO 267	S Mackie	1, 2, 3, 4, 6, 8, 9, 13, 14, 15, 16, 20
IO 268	F Dalmar	13, 20, 22, 23, 24
IO 269	L Choudhury	6, 11, 24
IO 270	Hampshire County Council (responses from Countryside Services regarding Rights of Way and HCC as a Minerals & Waste Planning Authority)	1, 6, 10, 11
IO 271	LDA Design on behalf of the Homes and Communities Agency (HCA)	2, 15
IO 273	LDA Design on behalf of the Homes and Communities Agency (HCA), NHS Property Trust (NHS) and University of Portsmouth (UoP)	15
IO 275	J Harden	1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 15, 17, 22, 24
IO 276	R Kay	1
IO 277	A Koor	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 17, 19, 20, 21, 22, 23, 24
IO 278	LDA Design on behalf of NHS Property Services Limited (NHSPS)	15
IO 279	Sustrans	1, 2, 4, 5, 6, 7, 10
IO 281	Cllr M Winnington	1,
IO 282	D Leslie	1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 15, 23, 24
IO 283	Cllr M Winnington	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25
IO 284	L Burberry	1, 2, 3
IO 286	Fareham Borough Council	1, 2, 16
IO 287	Portsmouth's Tackling Poverty Strategy Steering Group	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25
IO 288	J Burkinshaw	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 21, 22, 23, 24

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IO 289	S Jenkins	1, 11
IO 290	V Strange	2, 10, 24
IO 291	Portsmouth Liberal Democrat Council Group	1, 2, 10, 17
IO 292	K Nash	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25
IO 293	S Thomas	1
IO 295	S Thomas	1
IO 296	S Thomas	1
IO 298	I Steele	4
IO 299	M Nash	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 19, 20, 21, 22, 23, 24
IO 301	M Callan	1, 2, 3, 4, 5, 6, 8, 9, 10, 12, 13, 14, 15, 22
IO 302	J Mayes	1
IO 303	Cllr B Dowling	15
IO 304	Portsmouth & District Private Landlords Association	1, 2, 3, 4, 5, 6, 7, 8, 10, 22, 24
IO 305	R Cobb	22
IO 306	S Simmons	2, 9, 15, 24
IO 307	Historic England	1, 2, 5, 6, 7, 8, 12, 13, 15, 16, 17
IO 308	CBRE Ltd On behalf of Premier Marinas Limited and CBRE Global Investors (on behalf of USF Nominees Ltd)	14
IO 309	Portsmouth Cycle Forum	1, 2, 3, 4, 5, 6, 10, 15, 17, 18, 19, 20, 21, 22
IO 310	WYG on behalf of Sainsbury's Supermarkets Ltd	17, 24
IO 311	Havant Borough Council	2, 24
IO 312	The Portsmouth Society	1, 2, 4, 6, 7, 8, 9, 10, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24
IO 313	Portsmouth Cycle Forum	1, 7, 10, 14, 15, 16, 24, 25
IO 314	House Builders Federation	2, 24
IO 315	GVA on behalf of Landsec	1, 2, 3, 4, 5, 6, 7, 10, 17, 24
IO 316	Urban Vision Enterprise CIC On behalf of the Milton Neighbourhood Forum	15, 24
IO 317	Quod on behalf of RPMI Railpen	17
IO 318	Barton Willmore on behalf of Centros Portsmouth Limited Partnership (CPLP)	17
IO 319	Barton Willmore	1, 5, 6, 10, 11, 22, 23, 24
IO 321	Friends of Old Portsmouth Association	1, 2, 3, 6, 7, 10, 24
IO 322	Montagu Evans	1, 4, 17, 24
IO 323	S Crouch	1, 2, 3, 4, 5, 6, 7, 9, 10, 15, 17, 22, 23, 24, 25
IO 325	Barton Willmore LLP on behalf of University of Portsmouth	1, 2, 3, 4, 5, 6, 7, 15, 17, 23, 24
IO 326	P Critchett	2
IO 327	Portsmouth Fabian Society	1, 2, 3, 4, 6, 10, 11, 24

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IO 328	S Thomas	2, 4, 10
IO 329	S Wallis	22, 24
IO 330	Natural England	1, 6, 9
IO 331	L Burberry	22
IO 332	P Mills	2
IO 333	B Crawford	22
IO 334	The Royal Society for the Protection of Birds (RSPB)	1, 2, 6, 9, 13, 14, 15, 22, 24, 25
IO 335	R Kay	1, 2, 7, 10, 19, 24
IO 336	J Banforth	1, 2, 4, 7, 10, 13, 22, 24
IO 337	S Morgan MP	15, 24
IO 338	Environment Agency	7, 9, 11, 13, 14, 15, 16
IO 339	Chair of the Portsmouth Labour Housing Forum	2
IO 340	Gosport Borough Council	1, 2, 3, 5, 6, 9, 10, 17
IO 341	R Thomas	3, 4, 8, 24
IO 342	W Crouch	1, 2, 3, 4, 5, 6, 7, 9, 10, 15, 17, 22, 23, 24, 25
IO 343	Health and Safety Executive	11
IO 344	Southsea Association	2, 24
IO 345	Education & Skills Funding Agency	1, 3, 6, 11, 12, 13, 24
IO 346	C Seek	6
IO 347	Hampshire County Council, Hampshire Countryside Access Forum (HCAF)	24
IO 348	M Yang	22
IO 349	Deloitte LLP on behalf of Northwood Investors International Ltd	2, 3, 4, 7, 16, 17, 18
IO 350	K Nash	1, 2, 4, 7, 10, 15, 24
IO 351	A Broome	22