

Local Development Framework

Sustainability Appraisal Report:
Tall Buildings SPD

1. Purpose of the Sustainability Appraisal of the Supplementary Planning Document

- 1.1 The process of undertaking sustainability appraisal (SA) is now mandatory under the Planning & Compulsory Purchase Act (2004) for local development documents in the Local Development Framework (LDF). There is also an EU Directive which requires a 'Strategic Environment Assessment' (SEA) of plans and programmes, including development plans. The Office of the Deputy Prime Minister issued guidance on how to incorporate the two processes. In this report, SA should be taken to mean SA incorporating SEA.
- 1.2 The purpose of sustainability appraisal is to promote sustainable development through the better integration of sustainability considerations into the preparation and adoption of plans. It is an iterative process that identifies and reports on the likely significant effects of the plan, and the extent to which its implementation will achieve the social, environmental and economic objectives by which sustainable development can be defined.
- 1.3 This document is the sustainability appraisal report that sits alongside the Tall Buildings Supplementary Planning Document (SPD). It sets out how a sustainability appraisal has been undertaken on the SPD and what the results of this process were.
- 1.4 The Tall Buildings Supplementary Planning Document (SPD) forms part of the Local Development Framework. The SPD sets out guidance and a clear outline of the list of issues that Portsmouth City Council will expect applicants to address when bringing forward proposals for tall buildings:

- Visual impact
- Siting
- Height
- Effect on local views and vistas
- Alignment
- Mass
- Scale
- Form
- Urban Grain
- Streetscape
- Architectural Lighting
- Public Realm
- Public Access
- Climatic Impact
- Neighbourliness
- Materials

It also sets out areas of opportunity for tall buildings at:

- The Hard
- City centre/Dockyard/Ferryport
- Whale Island
- Kingston Crescent/Estella Road
- Fratton
- Tipner
- Port Solent / Horsea Island
- Cosham
- Western Road / Southampton Road

2. Assessment Methodology

- 2.1 As Sustainability Appraisal has become mandatory for all Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs), the city council has devised a generic sustainability appraisal framework for all of its Local Development Framework Documents, which is adapted to suit the needs of each document to be assessed. That document contains much of the background work that has informed the appraisal of the Tall Buildings SPD and some of the requirements of the SEA Directive have been met in that work. Readers may wish to refer back to the general scoping report published in September 2006, in order to gain a fuller understanding of the approach to SA the city council is taking for all the documents in the Local Development Framework. It is not considered useful to repeat all of that information for the assessment of each LDF document, so the general framework is available at www.portsmouth.gov.uk/living/4238.html. The general framework covers the required elements of the review of plans and programmes and the collection of baseline data. Most importantly, perhaps, it also sets the 14 sustainability objectives for the LDF, along with assessment criteria, against which each DPD and SPD is tested. The objectives are replicated in full at Appendix 2.

- 2.2 Appendix 3 sets out the SA framework for the Tall Buildings SPD. Readers will notice that not all of the SA objectives have been taken forward into the framework. A scoping exercise sought confirmation from key stakeholders of this reduced framework, which removed those objectives irrelevant to the Tall Buildings SPD such as 'education and lifelong learning' or 'climate change & emissions'. The nature of the SPD, a short document setting criteria for the location and design of tall buildings, has influenced the scope of the appraisal. It may help readers of this report to read first the SPD itself, in order to gain a better understanding of the content and scope of that document. Consultees were concerned that biodiversity issues may be affected by tall buildings, and this objective has therefore been included in the SA although it had initially been scoped out. The city council itself scoped the objective of employment and economy back in before undertaking the assessment, given the overlap of its defined town centres with the areas of opportunity for tall buildings identified in the SPD.
- 2.3 The SA has been prepared in accordance with the guidance set out in the OPDM publication 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks' (November 2005). In following the guidance, it is deemed that the appraisal meets the requirements of European Union Directive 2001/42/EC. The table in Appendix 1 sets out how the requirements for the environmental report set out in that Directive have been met in this sustainability appraisal report. The published general sustainability appraisal work for the whole LDF is considered to be part of this report (see paragraph 2.1).
- 2.4 Work on the general scoping report, the collection of baseline data and the document review was updated in 2006. The appraisal of the contents of the SPD was undertaken alongside the development of the SPD in the summer of 2008. Following consultation, changes were made to the SPD, which were again assessed prior to the final adoption of the SPD. The process was devised and led by planning officers, as it was considered important for those responsible for drafting the SPD to be actively involved in the appraisal rather than just reviewing the results at the end of the process.
- 2.5 This report sits alongside the SPD. If you have any questions regarding the SA, please call Jacqueline Boulter on (023) 9284 1276. For questions on the SPD itself please call Ben Cracknell on (023) 9284 1127. For either you can also email LDF@portsmouthcc.gov.uk.

3. Significant social, environmental and economic effects of the SPD

- 3.1 Appendix 3 sets out the assessment answers, including reasons for each assessment, arrived at during the SA.
- 3.2 Generally, officers found it quite difficult to assign scores to the likely impact of the SPD on the SA criteria: the SPD is well-intentioned, setting out design criteria and the best locations for tall buildings with the aim of producing well designed and located buildings for the good of their immediate surroundings as well as the city as a whole. While it could therefore be considered that the SPD will have a positive impact on many of the objectives examined, and indeed this is reflected in the scoring for example for landscape and townscape quality, much depends on the detail of individual schemes, which has resulted in a number of uncertainties being recorded, for example for the heritage objective. It is not the role of the SPD to reduce these uncertainties, as this would make the SPD unnecessarily prescriptive and would result in uninteresting monotonous developments. The uncertainties at policy setting level are therefore considered acceptable as ways for dealing with them at application level are built into the SPD.
- 3.3 One potential negative impact has been highlighted on the biodiversity objective. Some of the areas of opportunity for tall buildings are adjacent to designated intertidal habitats. Conservation interests have voiced concern about disturbance through noise, light or movement that could originate from tall buildings near these sensitive areas. A Habitats Regulations Assessment for the Core Strategy is currently underway and will assess this issue in more detail. It would seem premature to amend the SPD before the results of the Habitats Regs work are known, as this will give the most accurate assessment of the likely impact of tall buildings on the harbour. However, the final version of the SPD has added a criterion to areas of opportunity adjacent to designated sites to ensure that this sensitive location is properly recognised and any impacts are addressed.

4. Monitoring

- 4.1 The sustainability effects of implementing the document will be monitored to identify unforeseen adverse effects and to enable remedial action to be taken. Monitoring work will help assess in more detail the impact of the SPD on the baseline indicators and whether the effects predicted during the assessment are indeed occurring. A monitoring framework for the LDF has been devised and will form the basis of all monitoring work. This framework takes into account the need to monitor what significant effects the implementation of policies is having on the social, environmental and economic objectives by which sustainability is defined and whether these effects are as intended. It is not proposed that monitoring will take place specifically for the Tall Buildings SPD on its own. Rather, it will form part of wider monitoring work for the LDF and will be addressed in the annual monitoring report. In doing so, key sustainability indicators from the SA framework will be used in order to meet the requirements for SA monitoring.

Appendix 1: Compliance with requirements for environmental report under SEA Directive

Information referred to in Article 5(1)	Where has this requirement been addressed
a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Sections 1.3-1.4 of this report
b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Baseline report "Portsmouth 2005" (includes trends)
c) the environmental characteristics of areas likely to be significantly affected	Baseline report "Portsmouth 2005" and Appendix 3 of this report
d) any existing environmental problems which are relevant to the plan or programme, including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Baseline report "Portsmouth 2005"
e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way in those objectives and any environmental considerations have been taken into account during its preparation	General Scoping Report
f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above	Section 3 and Appendix 3 of this report
g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Section 3 of this report
h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Section 3 of this report
i) a description of the measures envisaged concerning monitoring in accordance with Article 10	Section 4 of this report
j) a non-technical summary of the information provided under the above headings	Not necessary as the whole report is short and non-technical.

Appendix 2: Sustainability Objectives

- 1 To minimise the emission of 'greenhouse gases' and other pollutants in order to create a cleaner city, to contribute towards a reduction in pollution, and to minimise the effects of global warming and climate change (*Climate Change & Emissions*)
- 2 To conserve the use of finite natural resources including (non-transport related) fossil fuels and minerals, and to preserve the quality of other valuable natural assets such as soil (*Natural Resources*)
- 3 To manage coastal flood risk, to promote the efficient management of the surface and groundwater system, and to safeguard water quality (*Coast & Water*)
- 4 To make sure that the city's most important wildlife species and habitats are protected and enhanced, including those of international, national and local importance (*Biodiversity*)
- 5 To maximise the use of the city's finite land supply (*Land*)
- 6 To preserve and enhance the character and appearance of the city and its surroundings, including its built-up areas and its open spaces (*Landscape & Townscape Quality*)
- 7 To protect and conserve Portsmouth's historic, cultural and maritime heritage (*Heritage*)
- 8 To ensure that good quality housing is readily available and attainable to all those who need it (*Homes for Everyone*)
- 9 To ensure that there are sufficient jobs within the city for those of working age, and that the city's economy is buoyant and diverse (*Employment & Economy*)
- 10 To ensure that everyone in the city has access to education and learning at all stages of life, and to help everyone achieve the necessary skills to acquire and retain fulfilling employment (*Education & Lifelong Learning*)
- 11 To promote and improve standards of health within the city's population (*Health & Wellbeing*)
- 12 To ensure that there are opportunities for everyone to participate in fulfilling, healthy and rewarding leisure and recreational activities to suit a full range of needs and interests (*Leisure & Recreation*)
- 13 To make Portsmouth a safe, comfortable and friendly place where people want to live, work and visit (*Quality of Life*)
- 14 To minimise unfair disadvantage or discrimination, so that all people in the city have equal access to facilities & services, feel part of a community and have a sense of pride in Portsmouth (*Social Inclusion & Community Satisfaction*)

Appendix 3: Sustainability Appraisal of Tall Buildings SPD

ISSUE & SUSTAINABILITY OBJECTIVE	ASSESSMENT CRITERIA: "What contribution does the SPD make to..."	SA SCORE	REASON FOR SCORE (and possible mitigation measures)
4 Biodiversity	Maintaining and/or improving the condition of internationally, nationally and locally designated nature conservation sites?	(x)	It is not considered that the SPD will impact directly on designated sites. However, the SPD does highlight areas adjacent to intertidal habitats eg Whale Island as possible locations for tall buildings. Conservation interests have voiced concern about disturbance through noise, light or movement that could originate from tall buildings in these sensitive areas. The Habitats Regulations Assessment for the Core Strategy is currently underway and will assesses this issue in more detail. It would seem premature to amend the SPD before the results of the Habitats Regs work are known, as this will give the most accurate assessment of the likely impact of tall buildings on the harbour. However, the final version of the SPD has added a criterion to areas of opportunity adjacent to designated sites to ensure that this sensitive location is properly recognised and any impacts are addressed.
	Safeguarding the role of non-designated sites in supporting wildlife in the city?	∅	The SPD has no impact on this objective
	Maintaining and if possible increasing the area of land actively managed for nature conservation?	∅	The SPD has no impact on this objective
5 Land	Re-using brownfield land, vacant sites and buildings?	∅	The SPD has no impact on this objective
	The density of development?	✓	Tall buildings allow high density development
6 Landscape & Townscape Quality	The quality / appearance of the built environment?	✓	It is acknowledged that some people may consider tall buildings <i>per se</i> to have an adverse impact on the built environment, but this is a subjective view. Whether one likes tall buildings or not, it must be accepted that the SPD will have a positive impact, as it sets parameters for the design and location of tall buildings.
	Fostering positive perceptions of the city's attractiveness?	✓	See above

ISSUE & SUSTAINABILITY OBJECTIVE	ASSESSMENT CRITERIA: "What contribution does the SPD make to..."	SA SCORE	REASON FOR SCORE (and possible mitigation measures)
	To protecting and enhancing the greenness of the city, by improving the quality and quantity of open spaces and trees?	∅	The SPD has no impact on this objective
7 Heritage	Maintaining and protecting conservation areas?	?	Some of the areas of opportunity are in or adjacent to conservation areas. The design parameters will ensure good quality buildings, although it is acknowledged that they will undoubtedly have an impact on the nature and appearance of the area. The council has consciously not sought to avoid conservation areas as opportunity areas for tall buildings as it accepts that conservation areas have to evolve and therefore does not consider these designations to be mutually exclusive. The SPD also points applicants towards pre-application advice from English Heritage.
	Maintaining and protecting listed buildings and scheduled ancient monuments and their settings?	?	Tall buildings will undoubtedly change the setting of certain listed buildings in the city, but design parameters will ensure good quality buildings. In addition, the SPD lists a number of key listed buildings and structures in the city that are particularly sensitive to the intrusion of new tall buildings. The SPD also points applicants towards pre-application advice from English Heritage.
	Maintaining and protecting the city's historic parks and gardens	?	The SPD highlights Southsea Common as an area that is particularly sensitive to the intrusion of new tall buildings. The SPD also points applicants towards pre-application advice from English Heritage. One area of opportunity for tall buildings is adjacent to Victoria Park.
9 Employment & Economy	Creating opportunities for increased employment levels by supporting new and existing businesses?	?	Tall buildings have the potential to accommodate substantial office space, but the SPD does not prescribe the uses to be contained within tall building schemes.
	Maintaining the role of the City Centre as a sub-regional centre and ensuring its continued vitality and viability?	✓	Tall buildings in a city centre can add a sense of drama and help convey a sense of status as a thriving centre of more than local importance.
	Maintaining the role of the Southsea as a town centre and to ensure its continued vitality and viability?	∅	The SPD has no impact on this objective. Tall buildings would not be appropriate in Southsea and the area has therefore not been identified as an area of opportunity in the SPD.

ISSUE & SUSTAINABILITY OBJECTIVE	ASSESSMENT CRITERIA: "What contribution does the SPD make to..."	SA SCORE	REASON FOR SCORE (and possible mitigation measures)
	Maintaining Gunwharf Quays' role as a specialist shopping and leisure destination?	?	Gunwharf Quays is not itself identified as an area of opportunity for tall buildings, but the adjacent Hard area is. Tall buildings here could either highlight the area as a whole as a key destination, or could draw attention to the Hard at the expense of Gunwharf Quays. This will largely be managed through Core Strategy policies on appropriate uses in the two areas.
	Maintaining the vitality and viability of the district shopping centres at Fratton, North End and Cosham?	✓	Fratton and Cosham are designated opportunity areas for tall buildings, which would bring more people into the areas, supporting their vitality and viability.
	Maintaining and enhancing the appeal of Portsmouth's visitor attractions?	✓	The SPD recognises some existing key attraction such as HMS Victory and HMS Warrior and the Spinnaker Tower as being sensitive to the intrusion of new tall buildings. The SPD also includes provisions on public access to tall buildings, which may serve to create new visitor attractions.
13 Quality of Life	Reducing the fear of crime and levels of crime, in particular violent crime and anti-social behaviour?	∅	It is not considered that the tall buildings SPD will have a significant impact on this objective, although it should be noted that the crime prevention design advisor has highlighted that police radio systems could be affected by tall buildings.
	The quality of people's living environment in terms of noise and pollution?	?	The SPD contains provisions to reduce the impact of tall buildings on neighbouring properties in terms of TV reception, general good neighbourliness, outlook, privacy, sunlight and daylight, noise and light glare.
	Reducing danger to all road users and the potential for accidents?	∅	The SPD has no impact on this objective.

✓ Positive effect	Where the document is certain to have a positive impact on the sustainability criterion
(✓) Possible positive effect	Where the document is likely to have a positive impact, but where there is some uncertainty
? Uncertain overall effect	Where the effect of the document on the sustainability criterion is uncertain, or where there are both positive and negative effects, thereby making the overall effect uncertain
(*) Possible negative effect	Where the document is likely to have a negative impact, but where there is some uncertainty
× Negative effect	Where the document is certain to have a negative impact on the sustainability criterion
∅ No direct relationship or no impact	Where there is no direct relationship between the document and the criterion or the document has only a very minor impact on the criterion

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