

# Portsmouth Local Plan Evidence Base Consultation (Feb 19) Summary of Responses

---

**July 2019**

# 1. Introduction

---

Numerous new evidence studies have been prepared to support the development of new Portsmouth Local Plan. These documents were published for consultation from 11<sup>th</sup> February to 25<sup>th</sup> March 2019, receiving a total of 64 comments from 26 respondents. This evidence base consultation follows the previous the *Portsmouth Local Plan Issues and Options consultation document* (August 2017)<sup>1</sup>; the comments received during this previous consultation helped to inform the development of the evidence base documents.

The following evidence studies and consultation documents published in February 2019 (in no particular order):

1. Consultation summary document
2. Housing Needs and Housing Targets Update
3. Housing and Economic Land Availability Assessment (HELAA)
4. Gypsy and Traveller Needs Assessment
5. Employment Land Study
6. Open Spaces Assessment
7. Transport Assessment Evidence Review
8. Retail Background Paper
9. Green Infrastructure Background Paper
10. An Assessment of Tree Cover in Portsmouth
11. Biodiversity Background Paper
12. Health Background Paper

This report summarises the responses received. There is a chapter on each document, plus an additional section to capture other comments received.

This consultation summary focuses on the issues raised, and for that reason the respondents are not named. However, where the identity of the respondent is particularly relevant to the issue being discussed, the organisation is stated in **bold**. A full list of respondents is set out in the appendix to this document and their full comments can be accessed from: <https://www.portsmouth.gov.uk/ext/development-and-planning/planning/the-local-plan>

The document also sets out an initial response to the topics raised. While this does not represent Council's final view, it indicates how further work to be undertaken for the new Local Plan is intended to proceed at this time, and how consultation comments influence the development of the Plan.

---

<sup>1</sup>A summary of the responses is available. PCC (Nov 2017) Portsmouth Local Plan Issues and Opportunities Consultation Summary of Responses. Available from: <https://www.portsmouth.gov.uk/ext/documents-external/pln-portsmouth-local-plan-summary-of-responses.pdf>

## 2. Housing

<b>Document:</b>	Housing Needs and Housing Targets Update
<b>Question:</b>	<i>Do you have any comments regarding housing needs or the contents of the background papers on Housings Needs and Updated Housing Targets?</i>
<b>Author &amp; Date:</b>	Portsmouth City Council, February 2019
<b>Paper overview:</b>	Sets out the national, sub-regional and local context of assessing housing need, and then discusses the current progress in calculating housing need in the city. In this context, the need for housing refers to the scale and mix of housing and the range of tenures that are likely to be needed in the housing market area over the plan period.
<b>Number of responses:</b>	13

### Disagree with rationale for providing more housing

Four respondents considered that the assumptions made in the assessment of housing need does not sufficiently account for local circumstances including:

- Uniquely, Portsmouth is the only island city in the United Kingdom, and is the only city whose population density exceeds that of London. Nationally produced projections are unhelpful in determining what the appropriate level of local housing need really is.
- Needs to reflect the para 72b of the NPPF and refer to the constrained nature of development as a caveat for producing lower levels of development.
- If the current Plan identified a potential supply of 11,484 new homes from 2006 to 2026 and we managed 6,082, including 2,116 "Affordable" additional homes, to 2018 then we are almost balancing supply and delivery on an annual basis.
- The assessment of housing need does not take into account environmental or policy constraints or infrastructure or land capacities. The standard methodology must be questioned.
- The has been change in the nature of the city since it last had a population higher than it is now in the mid-20<sup>th</sup> century, car ownership was much lower and the levels of employment in the city related to the Royal Navy was much higher.
- Assessment of housing needs should take account of subdivision of existing housing stock and the pressure it puts on residential areas.
- Housing need should take account of the provision of student accommodation.
- Housing is being occupied by people moving to the city rather than residents and their children.
- New dwellings will have a negative impact on air quality in the city through increased human activity. The target for housing is unrealistic particularly given the recent on-going air quality issues.
- Support the Council's position of the 26<sup>th</sup> of March on replacing the government's artificial housing target with one that's takes account of air pollution and the climate emergency.
- Students are transitory and should not be included in housing needs (detailed calculation provided).

- Building tens of thousands of new homes along the M27 corridor during the plan period will generate huge volumes of additional vehicles onto an already overloaded highway network. Land use and transportation must be planned together, rather than having a separate Transport Plan to deal with the consequential traffic problems of uncoordinated and unsustainable land use planning.
- A lack of parking and environmental space in the older residential areas, will be aggravated by building the 17,000 extra homes.
- The resident population in the city is increasing at a faster rate than the working population with a growth in population of 4.5% since the 2011 Census; this is higher than the rest of Hampshire and the UK. With resident's wages lower than the Solent average, then the implications for our resident population will face increase housing costs suggesting we need to adjust the "Affordable Housing" Ratio to 40%. The correct procedure is for every site to be qualitatively assessed in terms of what it can deliver to meet balanced housing and other needs and promote a progressive and sustainable future. There must be a carefully balanced judgement taking into account community aspirations, housing and other needs.
- There was a letter, dated 19th December 2014, from Planning and Housing minister Brandon Lewis to the Chief Executive of the Planning Inspectorate. In this letter Mr Lewis states that SHMAs are untested and "should not automatically be seen as a proxy for a final housing requirement in local plans". It continues: *'Councils will need to consider Strategic Housing Market Assessment evidence carefully and take adequate time to consider whether there are environmental and policy constraints, such as Green Belt, which will impact on their overall final housing requirement'*.<sup>2</sup>
- The result of the 2016 referendum is likely to reduce levels of immigration compared with the 2014 OAN projections.
- A plan should really have a joined up approach so that the loss of trees, the increase in housing and development, the increase in traffic, the increase in pollution, the strain on society, and the shortage of hospital and school places are all considered together as one problem.

### **Disagree with approach to provision of more housing in the city**

The **RSPB's** reiterated their previous comments to the 2017 Issues and Options consultation, which are summarised as follows:

- The housing options do not consider housing density. Increasing the density of development would reduce the land take required for housing and could be a possible means for reducing impacts on the SPAs and their supporting habitats, dependent on the location of housing sites in relation to the SPAs and supporting habitat.
- Whilst the pressure the council is under to deliver housing numbers that have been imposed on them by the Government is understood, they do not agree with the approach that is used to determine these numbers, particularly where an area is so tightly constrained by space and the presence of highly designated features of nature conservation value. Also disagree with the approach of trying to deliver unrealistic

---

<sup>2</sup> Capita Objectively-Assessed Housing Need Update Partnership for Urban South Hampshire Final Report  
April 2016 Pg10 1.8

housing numbers in areas that will inevitably be faced with challenges going forward. With the uncertainty surrounding climate change and in particular predicted sea level rise, development proposals should be located in areas where they will not be at risk of such uncertainty in the future. (HIWWT)

### Price of housing

- The cost of social housing is ridiculous at over £250,000 per 2 bed unit, is in excess of anything the private sector would pay.

### Agree with the standard methodology calculation

The Council is using the correct basis for the calculation of its standard methodology; and agree with the Council's assessment that the housing requirement of the new Local Plan should be 17,620 dwellings, 863 per annum, using the standard methodology. (Gladman, Homes Builders Federation (HBF), Fareham BC, Persimmon Homes).

- The Council should look to ensure that as much of its housing target is met within the Portsmouth City Council area (Fareham BC, Premier Marina's and CBRE, Gladmans).
- The Council should ensure a sufficient buffer to meet any changes throughout the Plan preparation period, so that the Plan strategy is resilient and flexible. (Premier Marinas and CBRE).
- The Council has identified undersupply of housing and needs to work with the neighbouring authorities to ensure this is taken into account through the duty to cooperate (HBF, Persimmon)
- Whilst the Council has worked with its partners authorities in preparing the PUSH Spatial Planning Position Statement there has been a collective inability to from the start to ensure that the unmet needs of Portsmouth are met. It is essential that the Council engages with its neighbours through the duty to co-operate to ensure those needs that not met in Portsmouth are delivered elsewhere. (HBF)
- Given that it is a requirement of national policy to prepare, publish and maintain Statement of Common Ground (SoCG) these should be part of the Council's evidence with regard to the duty to co-operate. (HBF)
- **Fareham Borough Council (FBC)** notes the local housing need for the city of 863 homes per annum using the standard methodology resulting in 17,260 new homes over whole plan period and ledge to continue to work with Portsmouth City Council as part of the Duty to Co-operate and as members of the Partnership of Urban South Hampshire (PUSH) in developing statements of common ground

<b>Housing Need and the new Local Plan – Initial Council response:</b>
<i>The comments raised regarding the difficulty in delivering high numbers of new dwellings are understood. However, it should be made clear there is a difference between local housing <u>need</u> (which is derived using the government's standard methodology) and what is then the housing <u>target</u> in the new Local Plan. Clearly, national housing and planning policy places great emphasis on the delivery of new housing but other factors, including many of those raised in the consultation response regarding issues such as pressure on</i>

*infrastructure, physical constraints and environmental impacts are all relevant and will be taken into account when determining the final housing target set in the Local Plan.*

*It should be noted that following publication of this background paper Cabinet at their meeting of 25 March endorsed the Administration's view that the Government's housing target of 863 homes per year be replaced by a local housing target that reflects the desire to cut the city's air pollution, the City Council's resolution to declare a Climate Emergency and the need for relevant transport infrastructure.*

*However, when considering the calculation of housing need only, the responses received have not raised any significant new issues and therefore it is considered that without any change in national planning policy, the starting point for considering housing need for the emerging Local Plan should be the government's standard methodology.*

*Comments regarding the Duty to Cooperate and the need for Statements of Common Ground are broadly accepted. The Council is working on bringing forward Statements of Common Ground with key parties as quickly as possible.*

### 3. Gypsy & Travellers

<b>Document:</b>	Gypsy and Traveller Needs Assessment
<b>Question:</b>	<i>Do you agree with the methodology and conclusions of the Gypsy and Traveller Accommodation Assessment?</i>
<b>Author &amp; Date:</b>	Opinion Research Services for Portsmouth City Council, November 2018
<b>Paper overview:</b>	The findings of an investigation into the need for gypsy travellers and travelling show people for permanent pitches and plots in the Portsmouth. The overall conclusion that was at present there is no current or future need for additional pitches or plots in Portsmouth over the period to 2036.
<b>Number of responses:</b>	Five

Two respondent agreed with the findings of the report that no additional pitches are needed.

One respondent would be against the introduction of any permanent gypsy/traveller sites, but suggested that temporary sites could be located in the north of eastern road industrial estate and Cosham.

While the findings are noted, the Council should be cautious of enabling sites by accident or oversight. E.g. the southern edge of Marina Keep at Port Solent has barriers to prevent vehicular access. **(RAPS)**

The **RSPB, Premier Marinas and CBRE Global Investors** had 'no comment' on the approach and findings of the report.

<b>Gypsy and Travellers and the New Local Plan - Council response:</b>
<i>Overall the consultation responses have not led to any significant new issues being raised or concerns over the findings of the evidence study.</i>

## 4. Housing and Economic Land Availability Assessment (HELAA)

<b>Document:</b>	Housing and Economic Land Availability Assessment (HELAA)
<b>Question:</b>	<i>What do you think of the methodology and conclusions of the HELAA?</i>
<b>Author &amp; Date:</b>	Portsmouth City Council, February 2019
<b>Paper overview:</b>	The document sets out the housing and economic land supply position for Portsmouth City Council's area. The document provides a context for the position in regard to sites in the city and for emerging Local Plan policies.
<b>Number of responses:</b>	18

### Housing mix

The future housing mix in the city must take account of demographic trends:

- Most of the population growth will be driven by the 65 years plus age cohort, although the traditional working age population is also projected to increase by 5,700 persons.

### Balance of housing with other uses

- It is important the right housing mix is settled on so we minimise any further erosion of green space.
- With regards to employment, the Council recognises that the updated Employment Land Study evidence has not yet been included in the current version of the HELAA in terms of the identified employment need, and will welcome the updated need figures in further iterations of the HELAA as the Local Plan progresses. (**Fareham BC**).

### Number of sites identified

- The assessed capacity of the city is less than the identified requirement using the Government's standard methodology and would be interested to find out how the City Council intends to address the identified shortfall of around 2,800 homes. (**Fareham BC**)
- It is important to stress the importance of having realistic delivery expectations within any allocations to ensure the deliverability of the plan across its lifetime. This is particularly important where there is a reliance on strategic sites to deliver the majority of new homes within the plan period and where there is an expectation that strategic sites will deliver as part of the five-year housing land supply. (**HBF**)
- The consultation document and HELAA note that there may be potential higher density development to be achieved in certain locations. In some areas significantly higher densities may be sustainable but it must also be recognised that were this development involves multi-storey flatted schemes it will require the necessary property values for it to be considered a viable development opportunity. Such development is more expensive to develop due to need for use of more extensive foundations, under-croft parking, increased need for steel, provision of lifts, services charges etc. So, whilst the Council may identify where it is considered desirable to

have higher density development the level of density that can be achieved in such locations may be tempered by what can actually be viably developed. (HBF)

- Having completed a HELAA, the Council has identified a likely shortfall of 2,800 dwellings over the plan period. This is currently a best-case scenario and it is unlikely that all sites identified within the HELAA will come forward for a multitude of reasons. In preparing the Local Plan it may be suitable to apply a discount rate to the identified HELAA figure to establish what may realistically be delivered in terms of HELAA capacity of the plan period. (Gladman)
- In applying a windfall rate to this calculation, the Council should also be looking at the likelihood of sites identified in the HELAA delivering. The Council should undertake research to determine how sites have delivered against identification in the HELAA in the past but Gladman would suggest in the interim a 15% discount rate could be applied to this figure. Applying this would result in a likely unmet need of around 4,700 dwellings over the plan period. Likewise, when allocating sites for development the Council should be applying a flexibility factor to account for any non-delivery of proposed allocations. (Gladmans)

#### **Other Comments:**

- Too complicated.

#### **Specific sites**

The following comments relate to specific sites in the HELAA.

#### **St James' and Langstone Campus**

- Object to the levels of development proposed at St James and Langstone. (four individuals)
- The site is currently providing a key link in a 'green corridor' across the city between Milton Common, the hospital grounds, Milton Cemetery, Milton Park and Bransbury Park. Without this area of high tree cover the large numbers of birds which live there now, would not be able to move between the sites.
- Since the city's failure to meet air quality standards has been publicised (March 2019) a programme to increase green spaces and numbers of trees is emerging. This plan must not remove those which are assisting with air quality. How much worse will the levels be when the tree cover has been decimated and 350 new car-owning residents - approx. 700 cars - join the local traffic flow.
- No-one has investigated the option of one high-rise block in St James' Hospital with underground car parking, or ground floor level for parking, leaving the remainder of the parkland totally as at present for public access as a park rather than trying to develop private garden space on the site.
- If Portsmouth residents under achieve educationally compared to national standards by 12.5% at Key Stage 2 and by almost 15% at Key Stage 4 and we also have poor access to health facilities then it is counter-intuitive to include school and health facilities in a Housing Availability Assessment irrespective of the disclaimer. By including for example existing community/employment sites such as St James'

Hospital (340) other objectives around deprivation factors such as poor healthcare and education provision are undermined. (Two individuals).

- Include a new school on Langstone Campus to better serve the SE Quadrant of Portsea Island.

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. (**RSPB**)

## **Port Solent**

- **RAPS** notes that the amount of new homes indicated for building here during the next ten years has been reduced to between 150 and 500, although even a 150-dwelling footprint equates to a development twice the size of The Anchorage, near to which, we are led to believe, it could be sited. The position of Premier is all-important to this: at the drop-in session on March 25th it was claimed that Premier could be interested in such a development at the expense of marina facilities (e.g. winter parking for boats) but any responses from Premier to RAPS questions about their intentions have been denials. A better shared understanding about "who decides who decides" is needed when it comes to land availability at Port Solent. Needless to say, anything that stands to diminish Port Solent's ability to operate as a working marina or its character will be opposed by RAPS. The facility to keep a boat ashore during the winter is a fundamental requirement for a marina.
- The Port Solent site is capable of delivering at least 500 residential units, which would be a key contribution to PCC's housing land supply. Port Solent is a brownfield site which is deliverable and developable and therefore in the context of the NPPF 2019 represents the type of land supply that PCC should be allocating in the Local Plan. It is also noted that Port Solent is capable of accommodating higher densities including potential for a tall building subject to further sensitivity testing. (**Premier Marinas and CBRE**)
- Given the proximity of the proposed Port Solent and Horsea Island site to Portsmouth Harbour SPA / SSSI we have serious concerns regarding impacts on the designated features of the adjacent wildlife sites from development in this location. We note that 'Impacts upon ecologically sensitive Portsmouth Harbour and Brent Goose feeding sites'; has been identified as an issue that will require addressing as part of this plan. (**RSPB**)

## Other sites

Loss of education and community facilities:

- If Portsmouth residents under achieve educationally compared to national standards by 12.5% at Key Stage 2 and by almost 15% at Key Stage 4 and we also have poor access to health facilities then it is counter-intuitive to include school and health facilities in a Housing Availability Assessment irrespective of the disclaimer. By including for example existing community/employment sites such as Eastney Health Centre (50 dwellings), and King Richard School (100), other objectives around deprivation factors such as poor healthcare and education provision are undermined. (Two individuals)
- The loss of an employment site and replace with 50 homes is Eastney Health Centre, affects health facilities for local people.
- It is also misleading to include sites such as Fraser Range (130) and Langstone Campus (120) for your calculations if the sites are unsuitable and would better meet wider deficiencies such as green infrastructure. The inclusion of these sites raise an expectation housing is acceptable notwithstanding the obvious restrictions and constraints (most of which undermine every other Plan Objective). (Two individuals).
- Whilst it is noted that this document does not allocate sites for development, and will be revisited prior to the finalisation of the Local Plan, we are concerned that the following sites are included in the 'Broad locations with potential for development' category in Stage 2 of the assessment: Tipner (BL1). Particularly concerned about the inclusion of Tipner West and Tipner Firing Range, both of which are immediately adjacent to the Portsmouth Harbour Special Protection Area (SPA). See the RSPB's response to the Tipner Strategic Development Area Consultation (Feb 2019) for further detail. (RSPB)

### **Housing and Economic Land Availability Assessment - Council Response:**

*The comments regarding the overall number of sites identified and potential dwellings which could be delivered are noted and broadly agreed. There will be a need as the Plan progresses to ensure that sites allocated in the Plan are shown to be deliverable. The comments regarding mixture of housing types are noted. The council is bringing forward a specialist study to look at the types of housing required in the city and this will be published in due course.*

*The comments raised on individual sites (St James/Langstone Campus, Port Solent, and others) are noted. It is reasonable to assume from the response received that those responding understood that the HELAA document itself does not allocate land for development. The comments raised regarding individual sites are noted and warrant further consideration before any site is proposed to be allocated for development in the emerging new Local Plan.*

## 5. Employment

<b>Document:</b>	Approach to Employment Land Study
<b>Consultation Question:</b>	<i>What do you think of the methodology and conclusions?</i>
<b>Author &amp; Date:</b>	BE Group for Portsmouth City Council (February 2019)
<b>Paper overview:</b>	A review of the existing economic evidence base to provide employment land forecasts for the new Local Plan. The report also considers key strategic employment sites, six small sites not covered by the previous Employment Land Review and the overall relationship of employment need to the city's housing needs. The report's recommended employment land target is based on an analysis of past land and floorspace take-up within the context of land supply realities in Portsmouth.
<b>Number of responses:</b>	Four

### Approach to Employment Land:

- The evidence suggests a good existing supply/ demand for employment land, but highlights the underachievement in educational qualifications by residents, leading to lower wages compared to 'in-commuters'. For an efficient and sustainable city in the long-term, the needs of residents and the needs of city businesses should be linked. An in-commuting reduction would also reduce pressure on the city's transport infrastructure and create more opportunities for Portsmouth residents (**Milton Neighbourhood Planning Forum**).
- The report recommends substantial new employment floorspace for the plan period, particularly for mixed employment use which is much higher than the recommended quantities in the PUSH Spatial Position statement of 2016. The evidence base needs to be much clearer on the justification for this recommended approach and the associated impacts on Portsmouth's ability to meet housing need (**Fareham Borough Council**).
- The approach to employment land should maintain a degree of flexibility to meet changing market needs, working practices and economic circumstances and allow for economic diversification to avoid vacancies and economic turndown (**Premier Marinas and CBREGI**). Therefore disagree with the approach of para. 6.7:

*"a strong argument demonstrating that employment uses are no longer appropriate on the sites should be required to release employment areas for other uses."*

### Approach to Strategic Employment Sites:

**Port Solent:** Premier Marinas and CBREGI act as landlords on their site and want to ensure longevity of Port Solent as a place for work and play. The Site Allocation for Port Solent should therefore:

- be flexible to accommodate the need for renewal and a shift in the way in which the property is considered as tenant's businesses change;
- include tourism and leisure as acceptable uses (inc. visitor accommodation) in addition to marine employment; and
- enable the marina and Boardwalk to be capable of further enhancements to secure the existing position as a 'destination' and to diversify economic activity.

**Tipner West/ Horsea Island:** landowner **John Pounds** representative requests that residential development is not precluded within the identified areas for employment uses at this stage given that there is still further technical work to be undertaken on the viability/ appropriateness of the significant employment allocation at Tipner West and Horsea East<sup>3</sup>; and that John Pounds is acknowledged as one of the landowners of Tipner West alongside the other parties mentioned in the report.

<b>Employment and the New Local Plan - Council Response:</b>
--

<p><i>The limited number of comments on this evidence base are noted.</i></p>
---

<p><i>Striking the right balance between employment and other key uses, including housing and open space, is an essential task of the emerging Local Plan. The call for flexibility on some sites is noted. Careful consideration however will need to be given to ensure that opportunity sites for new and expanding employers exist.</i></p>
---

<p><i>Comments received regarding Tipner are noted and are commented on more fully in the document summarising that consultation. Nonetheless John Pounds ownership of land at Tipner West should be recognised in all relevant planning documents.</i></p>
---

<p><i>One respondent noted asked for the justification of the employment needs figure to be much clearer. Given the importance of this issue, it is intended to revisit the employment needs figure to ensure that it is robust and justifiable in light of existing targets and emerging Local Industrial Strategy for the Solent being brought forward by the Local Enterprise Partnership.</i></p>
---

---

<sup>3</sup> See the Tipner Development Area consultation summary for further comments on this matter.

## 6. Retail and Town Centres

<b>Document:</b>	Portsmouth Retail and Town Centres
<b>Question:</b>	<i>Comments on other support documents</i>
<b>Author &amp; Date:</b>	Portsmouth City Council, February 2019
<b>Paper overview:</b>	A review of Portsmouth's existing retail policies to inform a retail and town centre strategy for the new Local Plan, taking account of wider market trends, national planning policy guidance, local monitoring data and previous public consultation responses.
<b>Number of responses:</b>	Two

### Approach to Retail and Portsmouth Centres:

- The background paper is already considered to be becoming outdated as there are 'clear signs' that the success of Outlets Centres is reversing. E.g. Gunwharf Quays is hard to access, not used by locals or 'millennials' and is compromised by worsening traffic conditions.
- The approach to retail and town centres should build on the recommendations of the Grimsey Report<sup>4</sup>, rather than being limited by the NPPF guidance<sup>5</sup>.
- There are clear examples that there is 'no appetite' for comparison retail in Portsmouth (e.g. the unimplemented Northern Quarter scheme, vacancies in Cascades, closure of Knight & Lee (John Lewis) in Southsea).
- More should be done to promote 2nd and 3rd tier shopping areas so that localities can become more sustainable.

Port Solent should be identified as a district centre (**Premier Marinas and CBRE Global Investors**). Reasons for an upgrade from local to district centre include:

- the significant increase in housing supply on the Western Corridor and at Port Solent itself;
- the unmet retail comparison floorspace requirements;
- to meet the needs of future residents and employees in the area; and
- to enable the growth of a supporting leisure and tourism role (see related comments on employment regarding Port Solent).

<sup>4</sup> See: Grimsey, B. (July 2018) *The Grimsey Review 2* 'It's time to reshape our town centres' available from: <http://www.vanishinghighstreet.com>

<sup>5</sup> See: MHCLG (Feb 2019) *National Planning Policy Framework*, Chapter 7: Ensuring the vitality of town centres

**Retail and Town Centres and the New Local Plan - Council Response:**

*The very low number of responses to this technical evidence paper are noted. Nonetheless, the views set out here are key for the city. Given the importance of the future of the city centre, it is intended there will be further work and consultation on the future of the city centre to better inform both the emerging local plan and other council initiatives.*

*The proposal that Port Solent is identified as a District Centre will be considered further as the retail policies in the emerging Plan are brought forward.*

## 7. Biodiversity

<b>Document:</b>	Biodiversity and Portsmouth background paper
<b>Question:</b>	<i>Comments on other support documents</i>
<b>Author &amp; Date:</b>	Portsmouth City Council, February 2019
	A review of the available evidence to develop an approach to biodiversity for the new Portsmouth Local Plan 2016-2036, taking account of national planning policy guidance, relevant legislation and case law, local and regional monitoring data and public consultation responses.
<b>Number of responses:</b>	Four

The following aspects of the background paper are supported:

- The approach of the paper, including the identification of the Portsmouth ecological network, detailed information on the sites that will be protected and identified actions for the Local Plan in Chapter 7 (**Natural England; RSPB**)
- The commitment to supporting sub regional strategic solutions for habitat protection including the Solent Recreation Mitigation Strategy and the protection of habitat replacement sites and strategic reserves in the Local Plan (**Natural England**).
- The proposal to require all development to achieve net gains in biodiversity and the Council's intention to produce additional guidance in a Supplementary Planning Document at a later date (**Natural England; RSPB; Hampshire Swifts**). However, the **RSPB** consider that Tipner Super Peninsula proposal in Portsmouth Harbour would contradict such commitments to biodiversity net gain.
- The commitment to joint-working with the South Hampshire local planning authorities to develop a strategic approaches to:
  - water quality: including the potential requirement to develop a nutrient neutral approach in due course; and
  - air quality: to ensure that in-combination air quality impacts are addressed.

### Biodiversity Net Gains

Good examples of net gain related SPDs were mentioned: *Basingstoke & Deane* and *Cornwall*. While *Warwickshire*, *Coventry* and *Solihull* were specifically mentioned for their approach to biodiversity off-setting and ensuring net gain.

**Hampshire Swifts** encourage the provision of Swift bricks to be fitted into all new build properties. Swift bricks are maintenance free, contribute to biodiversity net gains and would specially address the decline of Swifts (whose numbers have reduced by 50% in the last 25

years) and support House Sparrows (60% decline in numbers in last 20 years). House Sparrows are a red-listed species of conservation concern and Swifts are expected to be notified as red-listed at the next review.

**Natural England** advises that the funding of conservation projects that deliver biodiversity benefits projects could be appropriate for development with limited opportunities for biodiversity net gain on-site and/ or other development that requires offsite compensation or additional enhancements to achieve net biodiversity gain. Consideration should therefore be given to developing a suite of projects that development within the City can contribute to, thereby ensuring the biodiversity within the authority area is protected and enhanced. E.g. encouraging the submission of proposals from those involved with the management of local habitat sites, open spaces or green infrastructure to enhance the ecological value of these sites and/ or strengthen existing ecological corridors and networks.

### **Protecting Designated Sites**

The **RSPB** request that the objectives for the new Local Plan recognise for the sites of nature conservation importance, particularly those of international and national importance, with the aim of protecting and enhancing these features.

The **RSPB** refers to their major concerns with the Tipner Super Peninsula consultation<sup>6</sup> which involves direct land take from the SPA, the development of a SWBGS Primary Support Area and significant direct and indirect effects on the Portsmouth Harbour SPA and Ramsar site. They expect the next stage of the Local Plan to be accompanied by a comprehensive analysis of the emerging development proposals as part of a robust draft HRA, with any sites which fail to meet the Habitat Regs legal tests to be removed from the Plan.

### **Biodiversity Mitigation and Enhancement Plans**

**Natural England** recommends that the Local Plan requires all development that involves the provision of additional dwellings or employment uses and/ or proposals will lead to the loss of >0.1 ha (1000 sq m) of greenfield land (or known biodiversity interest), are accompanied by a Phase 1 Extended Habitat Survey' and a 'Biodiversity Mitigation and Enhancement Plan' (BMEP) (or "Biodiversity Net Gain Plan"). The BMEP should be informed by the Phase 1 surveys and set out clearly the biodiversity mitigation, compensation and enhancement measures that will be implemented in order to achieve a net gain in a format that can be secured by a planning condition.

In-line with NPPF guidance on pre-engagement, Natural England recommend the Local Plan encourages the agreement of the BMEP at the pre-application stage; an agreed BMEP, submitted upfront with an application, can help address issues at an early stage and reduce the risk of costly delays further down the line. Similarly, if development affects statutory sites and European Protected Species, the Local Plan should encourage applicant's to take advantage of Natural England's Discretionary Advice Service to agree necessary mitigation measures at the pre application stage.

---

<sup>6</sup> A summary of the responses to the Tipner Development Area Consultation is available from: <https://www.portsmouth.gov.uk/ext/development-and-planning/planning/the-local-plan>

## **Sub-regional projects: Solent Waders and Brent Goose Strategy**

In reference to the likely impacts on the Solent Waders and Brent Goose Strategy network from the proposed strategic site allocations (except the city centre) as outlined in the background paper, **Natural England** recommends that:

- The Local Plan includes a stand-alone policy to ensure the protection of the network of SWBGS sites.
- The Local Plan HRA appropriately addresses the impact of development allocations on the network of SWBGS sites.
- Site allocations on or near SWBGS Core Areas and Primary Support Areas should identify mitigation and offsetting replacement habitat, and agree the approach with Natural England at the earliest stage; this is in order to ensure that the replacement habitat can offset any loss and that it can be delivered and secured with the required level of certainty for the Habitats Regulations.
- Consideration is given to any direct or indirect impacts to SWBGS Secondary Support Areas and Low Use sites; primarily focusing on on-site mitigation, offsetting and/or enhancement. Where this has been demonstrated to not be practical or feasible and impacts cannot be avoided or adequately mitigated on-site, off-site options and / or compensation funding should be considered.
- Any compensation funding could include payment towards the management and enhancement of the wider Waders and Brent Geese ecological network, including strategic bird reserves and / or enhancement projects.
- Identification of any strategic compensation funded projects within the Local Plan to ensure that development allocations can be delivered with appropriate offsetting secured with the required level of certainty for the Habitats Regulations.

## **Sub-regional strategic projects: Water quality and resources**

Whilst work is on-going on the Integrated Water Management Strategy (IWMS)<sup>7</sup>, there is currently uncertainty as to whether there is sufficient capacity to accommodate new housing growth as well as issues arising from recent case law decisions, **Natural England** recommends the following:

- the impact of new development on the water quality of the designated sites needs to be thoroughly addressed in appropriate assessments, including strategic appropriate assessments;
- a Local Plan policy to commit to a nutrient management plan or similar strategy to offset the delivery of increased nutrients from local plan development;
- Larger development, including all EIA development and all development over 50 houses on greenfield sites, should calculate a nutrient budget and achieve nutrient neutrality.
- As may be difficult for developments smaller than 50 units and non-EIA developments on brownfield land to achieve nitrogen neutrality, an interim approach that developments can contribute to should be adopted urgently to ensure ensuring

---

<sup>7</sup> PUSH authorities, Natural England (NE) and Environment Agency (EA) have been jointly working to develop an Integrated Water Management Strategy (IWMS). This examines the potential for the PUSH region to accommodate future housing growth without having a detrimental effect upon the water environment. The purpose of this work is to provide a key strategic report to inform the preparation and soundness of the PUSH local plans with regard to both the Habitats Regulations and the Water Framework Directive. A Water Quality Working Group has been set up to identify and analyse the existing evidence gaps, agree a strategic interim solution and evaluate longer term strategic mitigation measures.

that this uncertainty is fully addressed by all applications and meets legal requirements until a wider PUSH IWMS strategy can be developed;

- Local authorities seek and rely upon their own legal advice on the interpretation of the Habitats Regulations and case law;
- the Local Plan should ensure that all new development adopt the higher standard of water efficiency under the Building Regulations (which equates to 110 litres per head/ per day including external water use) and re-use in line with best practice; and
- consideration should be given to the use of grey water recycling systems and waster efficient appliances.

#### **Biodiversity and the Local Plan – Council Response:**

*Overall the comments received in response to this document are extremely helpful and will be reflected upon and in many cases incorporated into ongoing technical work as the Plan progresses.*

*It should be noted that the comments received from Natural England summarised in this document were made in March 2019 and the position regarding nitrates in the Solent has developed since then. Nonetheless the comments regarding securing improved water efficiency standards in new development are acknowledged and are part of the Council's current approach to development.*

*It is acknowledged that there needs to be further discussion with Natural England regarding the Solent Waders and Brent Geese Strategy sites regarding any potential impact.*

*Individual proposals for improving biodiversity will be investigated for potential inclusion in the Plan or supplementary planning documents.*

*Concerns raised about the potential for the Super Peninsula proposal at Tipner are noted and are set out more fully in the Tipner consultation summary document.*

## 8. Open Space, Green Infrastructure and Tree Cover

<b>Document:</b>	Open Space Needs And Opportunities Assessment (Nov 2018); Green Infrastructure Background Paper (Feb 2019); An Assessment of Tree Coverage in Portsmouth (Feb 2019).
<b>Question:</b>	<i>What do you think of the methodology and conclusions of the Open Spaces Assessment? Also any comments on other supporting documents or any other comments in general?</i>
<b>Author &amp; Date:</b>	Portsmouth City Council (dates as above)
<b>Paper overview:</b>	Together this trio of papers helps to present a picture of the current condition of green infrastructure and open space provision in the city. They help to identify current and future needs and set out recommendations to help inform the relevant policies in the Local Plan.
<b>Number of responses:</b>	Nine

### Open spaces assessment

There were a number of comments relating to the open spaces assessment. The majority of the comments voiced positive feedback on the content of the report including that it appeared well researched, or that it made good recommendations for improving wellbeing in the city. There was generally little surprise or disagreement with the assessment's findings.

One resident raised that they felt it important that the Council consider provision of other types of communal spaces (such as pubs, clubs, halls), and their protection from being lost to other forms of development to encourage socialising amongst people to help address social wellbeing.

**Milton Neighbourhood Forum** considered that the document was too conservative on population growth predictions. One respondent from the forum also raised a point of clarification that in the document *'It is not 'a lack' of green space in Central Southsea and North End - it should say 'none'*.

### Green Infrastructure (GI) background paper/ Tree Cover Assessment

There were several comments relating to these pieces of background evidence. Again these were generally positive and did not raise disagreement with the content.

One respondent felt that it usefully expressed positive aims to create, protect, enhance and manage Portsmouth's green infrastructure to balance development needs and highlighted various positives of the document including inclusion of the term Blue-Spaces and the recognition of the city's unique coastal setting, as well as the Green-Grid initiative and the

reference to Green-Roofs and Green-Walls. The link to improvements in physical and mental health and well-being was also welcomed.

It was highlighted that it will be important for people to have an opportunity to comment on the green grid approach again at a later date as this is developed.

The **Woodland Trust** did raise that there was no reference to the Ancient Woodland Inventory or Ancient Tree Inventory (ATI) that Natural England recommend should be consulted. They found one veteran tree and two notable trees listed on the ATI within the city.

The Trust also went on to suggest new paragraphs of wording to enhance the content of the papers, these were in relation to: development near veteran trees, positives of trees in new development, trees and flood risk (including their role in Sustainable Drainage Systems, trees and air quality, trees and urban heat, trees and climate change as well as trees and health. They also pointed out a number of pieces of research and evidence to back up the text and inform ongoing policy formulation.

**Natural England** had a wide ranging response which included a number of comments in relation to green infrastructure. Most of these comments were supportive of the content of the consultation documents, though they also provided some additional thoughts and examples for consideration.

In summary, they fully support having a stand-alone green infrastructure policy to achieve net gain in green infrastructure across the city and prevent any net loss from new development. They welcomed recognition of the various multi-functional benefits of green infrastructure and open space in Portsmouth, and support the proposal to secure better access to high quality open space that is also designed to maximise opportunities for biodiversity enhancement. They also welcomed the proposal to encourage innovative design of green infrastructure in the urban environment (e.g. green roofs/walls) - one example given for consideration related to coastal locations and related to encouraging shingle roofs that may benefit waders, as well as supporting wider coastal habitats.

**Natural England** strongly recommended that opportunities are identified for all greenspace to be more wildlife friendly and cited a range of examples including:

- creating a new pond as an attractive features on the site;
- planting native trees characteristic to the local area;
- using native plants in landscaping schemes for better nectar and seed sources for bees and birds;
- planting additional street trees and or providing gardens with native trees;
- creation of new species rich grasslands on road verges and amenity areas. The stripping of topsoil to reduce fertility prior to appropriate seeding has been demonstrated to produce attractive biodiverse grass verges that have significantly lower annual maintenance costs than the more typical improved amenity verges;
- the use of cut and collect machinery on road verges and amenity areas to improve biodiversity; and
- designing lighting to encourage wildlife.

**Natural England** also give their support for the two new emerging approaches for green infrastructure policy set out in the background evidence: the green corridor approach across

the city, as well as the adoption of an 'Urban Greening Factor' Tool within Portsmouth as a mechanism to help address the current deficit in green infrastructure within the City and to address pressures from future development. A secondary stage to the UGF tool was suggested as having potential within the background paper and in response to this **Natural England** 'strongly encourages that the second stage of the tool is also adopted to help secure biodiversity gain in-line with *National Planning Policy Framework* paragraphs 8, 118, 170, 174 and 175d and Section 40 of the *Natural Environment and Rural Communities Act (2006)*.'

Finally **Natural England** welcomed the background paper on tree cover within the City that has identified areas of the City where targeted tree planting should be focused, for example areas of greatest need and within the ecological networks.

### **Other general comments**

**Sports England** noted that the Council have undertaken a robust and up to date assessment of its outdoor sports facilities in the form of a Playing Pitch Strategy (PPS). This has been carried out in accordance with Sport England's guidance. Sport England strongly recommends that the assessment and strategy is used to inform the development of the Local Plan and makes up a key component of the supporting evidence base.

**Milton Neighbourhood Forum** raised a number of points relating to the consultation documents and to the wider topic:

- The limitations on school-playground/games areas, and deficits in children's play-spaces exposed in the Open-Space document, illustrates a lack of regard for the needs of residents and the needs of our future generations. There are known issues with child obesity and current schools and play spaces near areas of poor air quality.
- Aspirations are good but ensuring deliverability is more important.
- The Council should consider identifying more specific opportunity areas around the city that could meet deficits and focus GI delivery in the future - not just identify challenges that need to be overcome in delivering GI/ open space.
- Whilst the recommendations appeared acceptable, it was unclear how they're to be evaluated in contributing to meeting health improvements
- Greening such as new trees must target public spaces.
- There is a continued uneven distribution of open space in the city, with the development of Horsea Country Park serving an area which benefits from open space already. There are wards in the city that are not well connected to it by public transport and which will benefit less from this space e.g. North Southsea/ Fratton residents.
- Residents need more closely accessible "wild-spaces" they can safely get to.
- Natural England's Objectives in making the British coastline more accessible would also be better respected with an enhanced publicly accessible coastal fringe.

They also raised some more specific queries:

- How will the council find extra allotment space in the future to meet future needs?
- Where will additional cemetery space come from?

## Specific locations

A few specific areas of the city were raised by respondents for the Council to consider as part of its GI/ open space planning:

- Fraser Range and Fort Cumberland (highlighted as opportunities to increase coastal fringe type space for public benefit).
- Inland Revenue Office at Hilsea.
- The vacant Portsmouth University site at Langstone Campus.

<b>Open Space, GI and Tree Cover and the New Local Plan - Council Response:</b>
<p><i>The comments received from all parties raised helpful points which will be reflected upon and in many cases incorporated into the evidence as the Plan progresses. The Playing Pitch Strategy referred to by Sports England, previously approved by the Council, will be placed on the Local Plan Evidence page on the Council's website, so its role is clear.</i></p> <p><i>In addition to the Local Plan work, the Council is progressing a Greening the City agenda after a report to the Cabinet Member for Planning Regeneration and Economic Development in November 2018. An update will set out progress since then.</i></p> <p><i>Finally, there will be another opportunity to comment on the green infrastructure approach in the Plan, including any "green grid" proposals, before the Plan is finalised.</i></p>

## 9. Health and Well Being

<b>Document:</b>	Health and Wellbeing Background Paper
<b>Question:</b>	<i>Do you have any comments on other supporting documents or any other comments in general?</i>
<b>Author &amp; Date:</b>	Portsmouth City Council, February 2019
<b>Paper overview:</b>	This paper focuses on the needs of Portsmouth's residents with regards to public health (as opposed to clinical health) and takes a population level approach to promoting health and preventing disease. It considers the current picture of health and wellbeing in Portsmouth, health themes for the new Local Plan and the development of a Wellbeing Impact Assessment Framework for the assessment of plan policies.
<b>Number of responses:</b>	Four

There were four responses that related to the general topic of health and wellbeing and the Local Plan.

Concern was raised at the implications of additional development on the city's air quality. The point was raised that the plan should be tailored towards improving people's health and avoiding negative impacts of air pollution.

A respondent from the **Milton Neighbourhood Forum** highlighted that the plan needs to address the range of health issues in the city including childhood obesity, mental health, cultural development and access to free play activities.

It was raised that there is a need for a joined up approach so that the loss of trees, the increase in housing and development, the increase in traffic, the increase in pollution, the strain on society, and the shortage of hospital and school places are all considered together as one problem.

Several respondents from the **Milton Neighbourhood Forum** raised a range of other comments:

- The Council has a responsibility to better use planning policies to prohibit a further widening of (health) differences irrespective of political will (both nationally as well as locally).
- The Council should take a longer term view, quantifying in monetary terms the long-term costs and benefits of land-use options so we can make more informed judgments on sustainable development objectives including human health; too long there has been focus on short term objectives rather than longer term ones.
- More effort should be made to enable walking and cycling to be easier, safer and healthier.
- The Plan should have a greater emphasis on improving Portsmouth for residents.

- Should make better use of derelict coastal sites for the benefit of the many and not just a minority of landowners.

**Health and the New Local Plan – Council Response:**

*The comments raised here on health issues are all relevant for the emerging Local Plan. Overall, no particular concerns were raised about the proposed Health Impact Assessment tool set out in the Background Paper and its potential use in helping in drafting the emerging Local Plan. Regarding air quality, it is clear that the new Local Plan will need a clear approach to air quality issues over the whole Local Plan period to 2036.*

## 10. Transport

<b>Document:</b>	Transport Assessment Evidence Review
<b>Question:</b>	<i>Do you agree with the methodology and conclusions of the Transport Evidence Review?</i>
<b>Author &amp; Date:</b>	SYSTRA Ltd for Portsmouth City Council, October 2018
<b>Paper overview:</b>	High level analysis of existing transport evidence to support assessment of strategic sites in the city and identification of key issues, constraints and opportunities. It is the first stage in a full Transport Assessment to accompany the new Local Plan.
<b>Number of responses:</b>	Four

Overall the respondents were supportive of the report's recommendations, but had some reservations. The underlying concern from all respondents was a perceived need for more comprehensive, up-to-date evidence. Traffic congestion and air quality were mentioned by most of the responses on the report.

**The Milton Neighbourhood Forum** believes that the study is insufficient to be used in an Evidence Review. Concerns are raised about varying demographic projections with growth by 2026 differing from previous estimates. They also raise concerns that inadequate consideration is paid to air quality issues and traffic congestion. Furthermore, they contend that a reference is made to a *2015 Strategic Housing Land Allocation Assessment* which was never adopted. They assert that a comprehensive report based on reliable evidence of highway capacity is required, with proper reference to growth projections. Analysis should also include an understanding of Ferry Operators and Commercial Dock operators' projections. They also call for an updated assessment of rail and freight capacity. They point to the *2018 National Infrastructure Commission's Report's* conclusion that Portsmouth observes the 4<sup>th</sup> worst congestion rate outside of London as reason for requiring a new strategic approach. Furthermore, they add that the NPPF mandates that infrastructure be in place to accommodate development - which will need to be addressed in light of traffic volume. Additionally, they discuss air quality concerns, referring to a Public Health Report which purportedly identifies road traffic pollution as contributing to the 19% higher incidences of premature deaths from cardio-vascular disease and nearly 30% higher cancer-related deaths above the national average. Thus, they conclude that sustainable transport improvements and traffic reduction measures are imperative in future development considerations. They express concern that there is only one reference in the paper to active travel and call for more to be done to assess potential sites against sustainable development objectives.

**Premier Marinas and CBRE Global Investors (on behalf of USF Nominees Ltd)** Their representative believes the transport background work needs further study. They would like the City to proactively determine solutions and coordinate with consultees and relevant stakeholders. In particular, congestion hotspots near to Port Solent need to be addressed. In the absence of this, they believe the Plan will fail to be 'deliverable'. Going forward, they expect that previous solutions and proposals will be reassessed, especially in light of further housing development and potential strategic work at Tipner and Horsea.

One respondent disagreed with the Transport Assessment for St James Plot 1 development, which for 107 residential dwellings, concluded that there is no expected change in traffic flows in comparison to the former hospital buildings, and that mitigations to the surrounding road network are not required. (detailed reasons provided including, accuracy of former hospital related journeys, non-hospital admissions related journeys, non-hospital related journeys, assumed capacity of hospital use, miscalculation of trip generation of ancillary buildings, peak hours calculations, walk to work rates).

Specifically in relation to information and possible mitigation options for Tipner, Port Solent and Horsea Island, the representative for **John Pounds** felt that the evidence was outdated. The representative concluded that their client would only support the development proposal for Tipner area<sup>8</sup> should there be sufficient proof that highway capacity would allow for the comprehensive redevelopment of Area B in addition to land in TRC control east of the motorway.

<b>Transport and the New Local Plan - Council response:</b>
<i>The low number of responses to this document is understandable, given that it is a compendium of previous transport evidence rather than a document setting out an approach to transport for the new Local Plan (which will follow). There will be a need to ensure that the identified transport “hot spots “ set out in the document are tested and confirmed before technical work proceeds.</i>

---

<sup>8</sup> See the consultation on the Tipner Strategic Development Area (Feb 19) and summary of responses available from: <https://www.portsmouth.gov.uk/ext/development-and-planning/planning/the-local-plan>

## 11. Other Comments

### Local Plan Process:

The next publication of evidence papers should show how the Council will plan more positively towards sustainable goals and properly appraise and evaluate the costs and benefits associated with them (**Milton Neighbourhood Forum**).

### Heritage:

Historic England commented that there is no reference in the consultation documents to any heritage-related evidence, and their queries on the *Issues and Options* in 2017 on developing a more detailed evidence base remain. The NPPF requires that:

*“Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:*

*a) assess the significance of heritage assets and the contribution they make to their environment; and*

*b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.*

The following research may need to be undertaken to provide a robust evidence base for the new Portsmouth Local Plan:

- visual impact assessments, considering the potential impact of allocations upon the setting of important heritage assets;
- seeking the views of the local community about what they value about the historic environment of their local area; and/or
- an appropriate archaeological assessment to consider whether heritage assets with archaeological potential are likely to be present in areas where the HER indicates that there has been little or no previous investigation.

Council Response:
<p><i>Whilst this consultation was on technical evidence studies, the draft Plan consultation will be accompanied by a Sustainability Appraisal setting out how social environmental and economic factors have been assessed and taken into account in the preparation of the Plan.</i></p> <p><i>The response from Historic England is noted. There is a need for an on-going dialogue with Historic England on these issues and officers will be discussing further with Historic England what further technical work may be appropriate as the Plan progresses.</i></p>

## Appendix 1: Consultation Questions and Index of Consultation Respondents

1	Do you have any comments on the section regarding housing needs or the contents of the Background Paper Housing Needs and Housing Targets Update?
2	What do you think of the methodology and conclusions of the Gypsy and Traveller Accommodation Assessment?
3	What do you think of the methodology and conclusions in the Employment Land Study?
4	What do you think of the methodology and conclusions of the Transport Evidence Review?
5	What do you think of the methodology and conclusions of the Open Spaces Assessment?
6	What do you think of the methodology and conclusions of the Housing and Economic Land Availability Assessment?
7	Do you have any comments at this stage?
8	Do you wish to upload a document in support of your response to this consultation?

The following table sets out the names of individuals and organisations who responded to the consultation.

ID	Respondent	Topics Commented on
1	A Rundle	8
2	Milton Neighbourhood Forum - J Burkinshaw	1,5,6,7
3	P O'Hara	1,5,6,7,8
5	Sport England	7
6	D Dod	5
7	Hampshire Swifts - D Warner	7
10	Hampshire Swifts - A Broadhurst	7
13	RSPB	1,6,7
14	RAPS	26
16	A Broone	1,2,5,6,7
18	J Bamforth	1,7,8
19	B Dowling	6,7,8
20	Fareham Borough Council	1,3,6,8
21	Gladman	1,6,7,8
22	Home Builders Federation	1,6,,7,8
23	Historic England	7,8
24	J Pounds	3,4,8
25	K Doyle	7,8
26	Milton Neighbourhood Planning Forum - R Bailey	1,3,4,5,6,7,8
27	P Docking	1,3,4,5,6,7,8
28	Persimmon Homes South Coast	1,8
29	Premier Marinas and CBRE Global Investors (on behalf of USF Nominees Ltd)	1,3,4,5,6,7,8

30	Natural England	7,8
31	Woodland Trust	7,8