

Local Development Framework

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# Sustainability Appraisal Report: Core Strategy (Regulation 27)



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## 1. Introduction

### Purpose of the Sustainability Appraisal and this report

- 1.1.1 The process of undertaking sustainability appraisal (SA) is mandatory under the 2004 Planning & Compulsory Purchase Act 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. Guidance for carrying out sustainability appraisal on development plan documents is included in the Communities and Local Government plan making manual. Sustainability appraisal incorporates the requirements of the EU Strategic Environmental Assessment (SEA), therefore in this report SA should be understood to mean SA incorporating SEA.
- 1.1.2 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.
- 1.1.3 This document is the sustainability appraisal report that sits alongside the Regulation 27 stage of the Core Strategy, which will be the key document in the Portsmouth Local Development Framework (LDF). The Core Strategy sets the vision for the city up to 2027 and identifies broad locations for development, protection or change. It will provide the context for all other documents in the LDF which over time will replace the adopted City Local Plan.
- 1.1.4 The purpose of the sustainability appraisal is to investigate the social, economic and environmental effects of the Core Strategy as it is developed, so that changes can be made to improve its sustainability impacts before it is finally adopted. This report sets out how SA has been undertaken on the strategy and what the results of this process were. This should be the last SA report given there should not be many significant changes between the Regulation 27 version and the adopted plan.
- 1.1.5 Readers should refer back to the Sustainability Appraisal Framework Update (published in April 2010) to gain a fuller understanding of the approach to SA the city council is taking for all of its Local Development Documents (LDDs). The document updates the September 2006 general scoping report, and contains much of the background work that has informed the appraisal of the Core Strategy. It also reduces the number of sustainability objectives from 14 to 10 in order to reduce overlap between objectives and to focus on those that are most relevant to Portsmouth. For example, it was considered unnecessary to have two separate objectives for 'climate change and emissions' and 'natural resources'. These were combined into one objective in the 2010 update.
- 1.1.6 Furthermore, a flood risk objective was added in 2010, reflecting the importance of this issue to Portsmouth. Flood risk issues had previously come under the vaguer objective of 'coast and water'. This followed a consultation response from the Environment Agency raising the need to highlight flood risk issues more clearly in the SA and integrate the Strategic Flood Risk Assessment (SFRA) into the appraisal process.

Water efficiency was also mentioned as a key sustainability issue. The non flood related assessment criteria under the previous 'coast and water' objective are now covered by the 'natural resources and climate change' objective.

- 1.1.7 Some of the requirements of the SEA Directive have also been met in the framework update. As it is not considered useful to repeat all of that information in this sustainability appraisal report, the framework update is available on the LDF pages of the Portsmouth City Council website at [http://www.portsmouth.gov.uk/media/SA\\_Framework\\_update\\_April\\_2010.pdf](http://www.portsmouth.gov.uk/media/SA_Framework_update_April_2010.pdf). It may also help readers of this report to read the Core Strategy document first, in order to gain a better understanding of the matters that have been assessed.

### **Compliance with the SEA Directive/Regulations**

- 1.2.1 The SA has been prepared in accordance with the guidance set out in the CLG Plan Making Manual (2009) which replaced the ODPM Sustainability Appraisal of Regional Spatial Strategies and Local Development Plan Documents (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 SA report.

### **When and how the SA was carried out**

- 1.3.1 The appraisal process was devised and led by planning officers, as it was considered important for those responsible for drafting the Core Strategy to be actively involved in the appraisal rather than reviewing the results at the end of the process. It is the purpose of the sustainability appraisal to challenge and improve the quality of the final plan, and it is therefore essential that the authors of the plan should be actively involved in the appraisal process.
- 1.3.2 Work on the general scoping report, the collection of baseline data and the document review was first undertaken in 2005 and updated in 2006 by officers in the planning policy team with input from other city council divisions and outside agencies. The methodology set out in that scoping report was tested a number of times in sustainability appraisals of LDF documents, including the Southsea Town Centre Area Action Plan Development Plan Document, which was found sound by an independent inspector in 2007. This framework was therefore considered fit for purpose and has formed the basis for subsequent updates.
- 1.3.3 During development of the core strategy, Sustainability Appraisal has taken place at the following stages:
- 2007 Issues and Options consultation
  - 2008 Preferred Options consultation (Regulation 25)
  - 2010 Two further rounds of Regulation 25 consultation
  - 2011 Regulation 27 pre-submission consultation
- 1.3.4 Further details of the findings of these sustainability appraisals are outlined in section 3 of this report.

### **Consultation arrangements**

- 1.4.1 Throughout the process, the city council considered it important to directly involve those bodies with a clear interest in sustainability matters, whilst retaining the opportunity for a wider audience to comment on the proposed methodology. To this end, and in accordance with the Statement of Community Involvement, the generic scoping documents were made available on the city council website and the three statutory consultees (Natural England, the Environment Agency, and English Heritage), as well as the Local Strategic Partnership and selected interest groups (The Royal Society for the Protection of Birds, the Hampshire Wildlife Trust, the Portsmouth Environmental Forum, Portsmouth Friends of the Earth, the local Chamber of Commerce, the Portsmouth City Primary Care Trust and the Portsmouth Society) were consulted directly.
- 1.4.2 This SA report is itself subject to consultation alongside the Regulation 27 stage of the Core Strategy. Comments are invited on both documents by 20 May 2011. Please address any representations to:

Local Development Framework  
Planning Services  
Portsmouth City Council  
Civic Offices  
Guildhall Square  
Portsmouth  
PO1 2AU

Or to [ldf@portsmouthcc.gov.uk](mailto:ldf@portsmouthcc.gov.uk)

If you have any questions regarding the Core Strategy or this report, please call the planning policy team on 023 9268 8633.

### **Other related assessments**

- 1.5.1 A number of other linked, but distinct assessments were also undertaken to assess the various impacts of the core strategy.

#### *Health Impact Assessment*

- 1.5.2 Although the Sustainability Appraisal Framework includes a specific objective for health and well-being, the city council considered it important to undertake a more thorough Health Impact Assessment (HIA). A HIA looks at the impact of a plan on the determinants of health, which can be grouped under the six headings of lifestyle, personal circumstances, access to services, facilities and amenities, social factors, economic factors and environmental factors. The full list of determinants of health is shown at Appendix 3, with the ones deemed to be most relevant to planning highlighted in bold. In order to determine the overall health impact, each of these determinants was considered in turn. However, as many of them overlap with the criteria in the sustainability appraisal, not all have been discussed in detail in the 'health and wellbeing' row of the assessment tables. Rather, it should be assumed that impacts identified on sustainability criteria that are also determinants of health should be taken to have the same impact on health. Impacts specific to health have then been set out in the health row of the table.

#### *Strategic Flood Risk Assessment*

1.5.3 An SFRA was undertaken on behalf of the Partnership for Urban South Hampshire (PUSH) authorities, to determine which areas in the sub-region were at highest risk of flooding and help make decisions about the most suitable locations for new development up to 2026. The SFRA has been used in assessing the suitability of development sites and the housing trajectory in the Core Strategy. Flood risk is also an objective in the SA framework.

#### *Equalities Impact Assessment*

1.5.4 The city council has put in place a process for assessing the equalities impact of plans, projects and city council operating systems. A preliminary EIA was done on the draft Portsmouth Plan in 2008 which recommended that a full EIA was not necessary. However, given the plan's extensive scope, it was felt that a full EIA would help ensure that the policies and proposals in the plan would not have a negative impact on different communities.

1.5.5 The EIA found that the plan will have an impact on everyone who lives in, works in or visits Portsmouth. The plan may have some beneficial impacts. For example, targeting regeneration efforts in areas of high deprivation may have a positive impact on Black, Asian and minority ethnic groups. Furthermore the plan could also have benefits for some age groups, people with disabilities and socially excluded groups or communities. For further information, see the full EIA at <http://www.portsmouth.gov.uk/equality/18838.html>.

1.5.6 Overall, it was concluded that the plan does not directly or indirectly discriminate, and that implementing the proposals in the Portsmouth Plan will not have a significantly disproportionate impact on any particular individual or group.

1.5.7 Another EIA will be conducted on the final version of the core strategy when it is put forward for adoption. This will highlight the impact on equality of any changes put forward at the examination or any changes made by the inspector.

#### 1.5.8 *Habitats Regulations Assessment*

The screening stage of the Habitats Regulations Assessment of the Core Strategy concluded that a full Appropriate Assessment would be required. The Appropriate Assessment is a much more detailed review of the likely impacts on sites designated at an international level. The HRA is especially important for Portsmouth given the impact the core strategy could have on a number of European Sites and the number of uncertainties relating to biodiversity highlighted in the sustainability appraisal process.

1.5.9 The draft HRA for the Core Strategy concluded that if its recommendations were followed, the negative effects of the core strategy in relation to the conservation objectives of the European sites would be removed and would not require further assessment in combination with effects of other plans and projects. The HRA has been followed meticulously in the core strategy to avoid adversely affecting the European sites. For example, the Tall Buildings policy was revised to further take into account the potential ecological impacts on the designated sites. The final version of the HRA is also available for consultation alongside the Regulation 27 Core Strategy document.

## **2. Appraisal Methodology**

## **The SA framework, including objectives, targets and indicators**

- 2.1.1 The city council has devised a generic sustainability appraisal framework for all of its Local Development Documents (LDDs). A scoping report was initially published in 2005 and was refined through consultation and updates in September 2006. This was updated again in April 2010 to ensure the baseline data was relevant and to review sustainability objectives. The updated framework document sets out the baseline data in tabular form, along with associated targets grouped together in 10 sustainability objectives, assessment criteria and indicators. Supplementary scoping documents are published as individual LDDs come forward, setting out in more detail which elements of the generic approach will be taken on board. The whole framework is relevant for the Core Strategy so there has been no need for a supplementary scoping stage.

## **Links to other strategies, plans and programmes and sustainability objectives**

- 2.2.1 The general scoping report contains a comprehensive review of all plans, strategies, guidance and legislation which relate to sustainability and which will influence the preparation of the LDF in general terms. These documents range from international guidance and legislation at the highest level, through UK government policies and guidance, to corporate policies and strategies at the local level. They also include targets and objectives of regulatory and advisory organisations (for example the Environment Agency and Natural England). The main sustainability objectives from these documents have been recorded in a database. This database is updated as and when documents are superseded and/or new documents are published. The last update occurred in April 2010 during the revision of the framework and before the drafting of the Regulation 27 version of the core strategy.

## **The social, environmental and economic baseline**

- 2.3.1 As part of the preparation of the General Scoping Report, a wide variety of information relating to a number of different sustainability issues was collected. Most of this was presented at city-wide or ward level, in order to provide a broad overview of the key sustainability issues affecting the city as a whole, which would be relevant to the whole LDF. This information was set out in the 'Portsmouth 2005' Baseline Report, and formed the basis of all subsequent updates to the baseline data.
- 2.3.2 An extensive review of the baseline information was carried out during the framework update in 2010. All data was reviewed and updated where possible. Assessment criteria were deleted in some cases where they were considered extremely out of date or no longer relevant to the sustainability appraisal. The plans and programmes were also updated in this way.

## **3. Assessment of the Sustainability Impacts of the Core Strategy**

### **Core Strategy Vision and Objectives and their compatibility with sustainability objectives**

- 3.1.1 The vision for the Core Strategy is taken from the city's Sustainable Community Strategy. It is *To make Portsmouth the premier waterfront city, with an unrivalled maritime heritage – a great place to live, work and visit.*
- 3.1.2 The Core Strategy also includes eight objectives taken from the Sustainable Community Strategy that need to be met in order to achieve this vision. In line with the guidance on sustainability appraisal, these objectives have been checked for their compatibility with the 10 sustainability objectives set in framework update. Appendix 4 shows the full results of this assessment. As both the SA objectives and the plan objectives are designed to achieve sustainable development in the city, it is unsurprising that there were no combinations of objectives that were entirely incompatible. There were, however, combinations of objectives where some tensions are possible, mainly relating to the problem of competition between uses for land. Nonetheless, in all these cases there are also positive aspects to maintaining both objectives. For example, delivering sufficient housing requires a certain amount of land, for which employment uses to develop the economy will also be competing. At the same time, however, house building supports the economy, both as a profit making activity and because good quality housing attracts better skilled workers. Similarly, house building can put pressure on biodiversity and open space, but as the emphasis is on good quality housing this is taken to include high quality environments, which support biodiversity and open space objectives. Overall, the core strategy objectives and the sustainability objectives were considered compatible, and no changes had to be made to the plan objectives as a result of the sustainability appraisal.

## **Options considered and why rejected**

### **Issues and options**

- 3.2.1 The first stage of development of the Portsmouth Plan was an issues and options consultation carried out during 2006 and 2007. Three broad options for future development in the city were put forward during these consultations: greener development, dispersed development and a balanced approach. The greener development option proposed to ensure that future development will be located in accessible locations around existing areas of activity. This was to encourage more people to use public transport and reduce reliance on the private car. Dispersed development would provide the market with more freedom to decide where to develop and would ensure that conditions in the city were right to promote further economic growth. The balanced approach would have sought the middle ground between the other two options. These options were presented as strategic approaches and did not imply a strict adherence to the detriment of other considerations. The sustainability impacts of these approaches were included as part of the consultation and are attached at Appendix 5.
- 3.2.2 Dispersed development was considered to be the least sustainable and also received the least amount of consultee support. Respondents suggested that there was no sense of overall planning in this option and they considered the focus on the economy and the market would not benefit the environment or quality of life. The remaining two options had similar sustainability results to each other, however whilst a balanced approach had the greatest number of total positives, the greener development option had the highest number of certain positive impacts and no negative scores.

Consultees also indicated a clear preference for greener development and therefore it was decided to put forward this approach as the council's preferred option.

- 3.2.3 The greener option is also considered more appropriate for the city because it locates development close to public transport routes and hubs which helps to minimise the need to travel. It also helps to reduce emissions and make the most efficient use of land which is very important in Portsmouth given the scarcity of suitable developable land in the city. The greener option also gave the impetus to greening the city and improving design, both in terms of architectural quality and sustainability.
- 3.2.4 Some elements from the other two options which were considered important by consultees, and did not conflict with the greener approach, were included in the preferred options plan. For example, extending the city centre boundary to include Gunwharf Quays and The Hard was not initially included in the greener development option. However, given this would support the role and vitality of the city centre and may reduce the need to travel, this strategy was considered to have a positive and sustainable impact.

### **Preferred options (Regulation 25)**

- 3.3.1 The Preferred Options consultation took place in 2008 and set out the spatial strategy for Portsmouth to enable its sustainable development through to 2026. A sustainability appraisal of the strategy and policies of the Preferred Options stage was also available for consultation and is available at [http://www.portsmouth.gov.uk/media/SA\\_report\\_-\\_Core\\_Strategy\\_2008\\_.pdf](http://www.portsmouth.gov.uk/media/SA_report_-_Core_Strategy_2008_.pdf).
- 3.3.2 The preferred options draft plan advanced the greener development option chosen in the issues and options stage, and introduced a number of policies to work towards more environmentally friendly development. This included a policy on Sustainable Development which required development to meet either Code for Sustainable Homes or BREEAM standards as well as a number of other sustainability objectives. If dispersed development or a balanced approach were pursued, only the basic level of the Partnership for Urban South Hampshire sustainability policy framework would have been implemented. Furthermore, the greener development option taken by the council means the majority of new housing, retail and employment developments are directed to key development sites, town centres and existing employment sites. These areas either have very good existing public transport links, or will have as a result of the new development.
- 3.3.3 The sustainability appraisal noted that the levels of development proposed could put pressure on water supply and quality and designated sites of conservation and other natural habitats. Furthermore, it could result in an increase of emissions, waste and pollution. The greener approach of the Portsmouth Plan put forward in the Preferred Options stage sought to mitigate these negative impacts. For example, policies were included to protect the city's green and open spaces, provide necessary levels of infrastructure and ensure the highest levels of design quality in development.
- 3.3.4 Although largely positive, the sustainability appraisal noted a significant impact of the proposed plan with regards to flooding. Given the dense urban nature of Portsmouth and the very limited amount of developable land, it is not possible to develop and grow the city's economy without further development in flood risk areas. The flood risk

policy notes this and makes it clear that defences will have to be upgraded and development shown to be safe. At this stage, the city council also began to work more closely with the Environment Agency (EA) to develop an agreed approach to dealing with development and flood risk. For further information, please refer to the paper “Development and Tidal Flood Risk: Statement of Common Ground”.

- 3.3.5 The sustainability appraisal concluded that some policies would have a negative impact on sustainability, but these policies were not changed given there were other sustainability reasons for including them in the plan. For example, the flood risk policy requires sea defences in sensitive areas to protect Portsmouth from tidal flooding. This will result in coastal squeeze and a loss of some important habitats. However, the city has to be defended from flooding into the future to protect both lives and property meaning that flood defences are an overriding necessity. Every effort will be made to mitigate adverse impacts on important habitat. Another example is the requirement to build more family homes in the city which may come forward at lower densities, therefore making less efficient use of land. However, evidence shows there is a lack of suitable family housing in the city, therefore in order to provide an appropriate mix of dwelling types it is considered important to deliver larger units of three bedrooms or more.
- 3.3.6 The most positive policy included at this stage was the sustainable development policy which covered a variety of matters applicable to development across the city. This included energy efficiency, planting and the use of recycled materials in development.
- 3.3.7 Whilst noting that the definitive impact on health in the city would be difficult to determine at this stage given the strategic nature of the document, the Health Impact Assessment indicated the plan will have an overall positive impact. The only change made as a result of this assessment was to insert a requirement to consider training and local labour agreements into S106 agreements under the infrastructure and community benefit policy.

### **Further Regulation 25 consultations 2010**

- 3.4.1 There was broad support for many sections of the Preferred Options plan and as a result these policies have not been significantly changed. However, feedback from the 2008 consultation, together with further evidence gathered, resulted in proposals to change parts of the draft plan as well as introduce new policies. New options for development at the strategic sites of Tipner, Port Solent and Horsea Island were also put forward during the summer. It was decided to undertake an additional round of Regulation 25 consultation on these changes and new options in order to keep the community involved in the development of the Portsmouth Plan.
- 3.4.2 Some of the changes made to the plan at this stage were to strengthen the greener development elements of the first issues and options consultation. For example, rather than have policies relating to sustainable development and green spaces in the same policy, it was decided to create two separate policies where these important environmental issues could be expanded on and further developed. The sustainable development policy became the sustainable design and construction policy and retained requirements relating directly to development such as requiring code for sustainable homes standards. Meanwhile, sections of the sustainable design policy relating to green spaces, such as developer contributions and green walls, were

moved to a wider green infrastructure strategy which also incorporates the former open space policy.

- 3.4.3 A Healthy City policy was also introduced to improve access to healthcare facilities across the city and to provide opportunities for residents to engage in more healthy pursuits. This is to encourage people to make healthy lifestyle choices to address the inequalities in health and life expectancy in the city which can vary depending on which part of Portsmouth someone lives in. Improving health and quality of life is an important part of the greener development option.
- 3.4.4 Other changes included introducing a housing size and affordable housing element to the housing mix policy as well as a separate housing density policy. Whilst the sustainability appraisal indicated these policies would have a negative effect on flood risk, improving the standard and availability of housing would have a positive impact on providing good quality homes that will stand the test of time. Furthermore, setting appropriate density levels across the city could help to make the most efficient use of land in Portsmouth.
- 3.4.5 The overall SA process was favourable. It was considered that no significant changes to policies needed to be made and that they would have a generally positive impact on sustainability. The new A Greener Portsmouth Policy (previously the open space policy) has a positive or possible positive contribution to all the sustainability objectives whilst the Housing Mix, Size and Affordable Homes policy will ensure sufficient numbers of housing are delivered in the city over the plan period. It would also ensure housing is delivered to a high quality standard and will be suitable for future generations.
- 3.4.6 A last round of consultation was conducted between November 2010 and January 2011 on a revised housing target for the city and a policy on Houses of Multiple Occupation. SA for the housing number was generally favourable given the provision of more housing will help to meet the city's needs. Policies such as Sustainable Design and Construction will mitigate adverse impacts of more housing where they arise. Although the SA for the Houses in Multiple Occupation Policy was also generally positive, a negative impact was noted on the Education, Employment and Economy objective given it may make the city a less attractive place to study and seek employment. However, the policy does make a possible positive impact on five other objectives including health and wellbeing where the policy may result in lower levels of burglary and anti-social behaviour.
- 3.4.7 A full sustainability appraisal was conducted on all policies in the summer 2010 consultation and is available at [http://www.portsmouth.gov.uk/media/SA\\_Appraisal.pdf](http://www.portsmouth.gov.uk/media/SA_Appraisal.pdf). The sustainability appraisals for the Housing Number and House in Multiple Occupation policy are available at [http://www.portsmouth.gov.uk/media/Microsoft\\_Word\\_-\\_SA\\_report\\_for\\_housing\\_numbers.pdf](http://www.portsmouth.gov.uk/media/Microsoft_Word_-_SA_report_for_housing_numbers.pdf) and [http://www.portsmouth.gov.uk/media/Sustainability\\_Appraisal.pdf](http://www.portsmouth.gov.uk/media/Sustainability_Appraisal.pdf) respectively.

## **Significant social, environmental and economic effects of the Regulation 27 Core Strategy**

- 3.5.1 The results from the summer consultation, as well as those from the consultation on new housing numbers and houses in multiple occupation, have been taken into consideration in formulating the draft submission core strategy. These new and updated policies have been joined with those from the Preferred Options stage to produce the Regulation 27 document.
- 3.5.2 This Sustainability Appraisal is the final test to show that the council has taken into account all representations received through the consultation process and is putting forward a sustainable core strategy for adoption.
- 3.5.3 Appendix 6 sets out the results of the SA process. The majority of the scores are either positive or indicate no direct relationship. This indicates that the greener development approach taken during the production of the plan has had a positive impact given only a few sustainability objectives will be adversely affected by the core strategy. The SA process has enabled the council to change policies that would otherwise have a negative sustainability impact. Policies that are still shown to have a negative impact in this sustainability appraisal have overriding sustainability imperatives that outweigh the potential harm. The most obvious example is development in flood risk areas which is identified in the sustainability appraisal as having a negative impact, but cannot be avoided in Portsmouth if the city wants to try and meet the demand for new housing and continue to achieve economic growth.
- 3.5.4 Many of the policies will make a certain or possible positive contribution to sustainable development in the city. Uncertain scores are largely because policies will depend on other factors, such as application-specific details, before a firm judgement on their sustainability impacts can be made. For example, the impact of the proposed bridge link from Tipner to Horsea Island cannot be firmly identified until a site for the bridge and a design proposal is put forward. Related policies in the core strategy will help to ensure that in these cases, the final sustainability outcome is positive. As in earlier sustainability appraisals, the most significant adverse impacts outlined relate to flood risk and biodiversity.

## **Main issues from Regulation 27 SA**

### **Negative impacts**

- 3.6.1 The issue of flood risk has come up throughout the SA process because it is impossible for Portsmouth to provide more housing and employment land to try and meet anticipated demand without building in flood risk areas. The Density, Tall Buildings, Housing Delivery and Employment Land policies all score negatively for flood risk. The physical reality of developing in Portsmouth means that no change can be made to these scores as flood risk can never truly be eliminated from the sustainability appraisal relating to these policies. However, mitigation is included in the core strategy through policies on Flood Risk, A Greener Portsmouth and Infrastructure and Community Benefit, to address these negative effects. For example, the flood risk policy will ensure sea defences are protected and enhanced and that important upgrades to the city's sewerage system are undertaken to support development and avoid flooding from this source. The Greener Portsmouth policy will look to protect green spaces which can act as heat sinks and will absorb surface water run off. For further information, please refer to the paper, "Development and Tidal Flood Risk: Statement of Common Ground".

- 3.6.2 Biodiversity has also been identified as an issue through the SA process. The strategic sites of Tipner, Port Solent and Horsea Island are in close proximity to European designated sites of nature conservation. Furthermore, given Portsmouth's relatively small size, the impact of new dwellings at any location in the city could have an adverse impact on these sites in terms of increased recreational disturbance. Similarly to flood risk, a lack of available sites in the city means these areas will need to be regenerated in order to provide for and support future growth. A Habitats Regulations Assessment for the wider core strategy will ensure nature conservation interests are not compromised by development. Furthermore, the Greener Portsmouth policy will work to provide more green and open spaces where possible whilst enhancing the multifunctionality of other spaces in the city in order to relieve recreational pressure resulting from new development.
- 3.6.3 Another significant issue is the proposed bridge link between Horsea Island and Port Solent. This is an important piece of transport infrastructure which will need to be provided to ensure these strategic sites are regenerated to their maximum potential. The score for this policy is uncertain in relation to biodiversity because the details of the bridge link have been signposted to a lower level of plan-making. However, at this lower level a full HRA will be needed on the impacts of the bridge ensuring it will not adversely impact Portsmouth Harbour. This is one of the many indications of the core strategy's greener development stance.

### **Positive impacts**

- 3.6.4 The natural resources and climate change objective generally scores very well during the SA process. This is especially true for the A Greener Portsmouth and Sustainable Design and Construction policies which address the majority of the issues in this objective. For example, the A Greener Portsmouth policy will ensure sites of importance for nature conservation are protected in new development, and will also encourage improved linkages to the green grid which may reduce recreational pressure on designated sites such as Farlington Marshes. The Sustainable Design and Construction policy meanwhile will ensure emissions from new developments are minimised and greener construction methods are used.
- 3.6.5 The Landscape and Townscape objective also scores well in the SA. The Design and Conservation Policy contributes much by ensuring the highest standards in design throughout the city, and therefore will help to foster positive perceptions in the city's attractiveness. Together with the policies for the strategic sites, the Infrastructure and Community Benefit policy will help bring forward regeneration at some of the more prominent locations in the city. This will help to greatly improve the appearance and attractiveness of the gateways into the city.
- 3.6.6 The plan also has positive impacts on a number of other sustainability objectives including providing homes for everyone, culture, leisure and recreation, social inclusion and employment.

### *Health*

- 3.6.7 The Health Impact Assessment showed that in general terms the strategy will have a positive impact on health for the city, with increased access to public transport, cycling and walking and by ensuring that development occurs near existing services and

facilities. The strategy also puts an emphasis on providing adequate infrastructure for any new development. The regeneration of certain areas of the city will also have a positive impact on social cohesion, personal safety and the fear of crime, although it is not possible to say whether this would have an impact on the actual level of crime.

- 3.6.8 The area of most concern was education and skills, as encouraging businesses included in the new developments to recruit local employees and provide training was absent from the area policies. As a result, the policy on infrastructure and community benefit has been amended to address this concern. The policy links community benefit to the improvement of skills in the city through the provision of skills training related to the type of new development or the use of local labour in construction.
- 3.6.9 In general terms, it was noted that it was difficult to determine the definitive impact on health of the proposed core strategy policies, due to the strategic high level nature of the document. Ultimately it would depend on the exact nature of the development proposed. In order to avoid adverse health impacts or an increase in health inequality, careful consideration will have to be given to local residents near and on identified sites for development when proposals come forward.

### **Proposed mitigation measures**

- 3.7.1 The guidance advises that where adverse effects are expected, mitigation measures against these should be considered. Sustainability appraisal through the core strategy process has helped to eliminate most negative effects. However, some have remained, and the detailed assessment tables give reasons why changes have not been made to the wording of those policies. Generally, this is because other sustainability considerations indicate that the policy is needed and that mitigation measures are built into other parts of the plan. For example, possible adverse impacts have been recorded for the objective of Flood Risk, as the strategy does not totally exclude development in flood risk areas. However, the flooding policy makes clear what criteria development will have to in order to reduce and manage any flood risk. As another example, requiring part of the housing supply to come forward as larger family units (of three bedrooms or more) may not be the best use of land in term of densities, but is important if the city is to meet its housing needs and provide an appropriate housing mix in terms of dwelling sizes.
- 3.7.2 The SA process has however, been used not only to minimise negative impacts but also to ensure that positive impacts are maximised. Changes made to the draft strategy during the SA process include:
- The design policy has been altered to better reflect that designing out crime should be a feature of new development. Further detail is set out in the LDF Reducing Crime Through Design SPD.
  - The Sustainable Development policy has been altered to make specific reference to recycling facilities, instead of waste in general; the wording has also been strengthened in relation to recycled construction material, removing the words 'wherever possible'.
  - The seafront: the policy has been altered to include a requirement to protect the nature conservation value of Eastney beach

## 4. Monitoring

### Proposals for monitoring

- 4.1.1 It is proposed that monitoring of the sustainability impacts be part and parcel of the general monitoring of the impacts of the plan. In sustainability terms it will be particularly important to monitor the impacts in relation to flood risk and infrastructure, which have been highlighted in the SA as the areas most likely to be adversely affected. Whether the positive impacts anticipated from the sustainable development policy are actually occurring must also be particularly monitored.
- 4.1.2 Monitoring indicators for these matters will include:
- % of Portsmouth's coastline protected to a 1 in 1000 yr flood event.
  - Number of dwellings at risk from flooding
  - Provision of infrastructure in line with infrastructure plan
  - Level of contributions collected for community infrastructure and schemes implemented as a result
  - % of developments meeting at least code level 4 or BREEAM very good standards
  - The density of new residential development
  - Net additional dwellings
  - Change in areas and populations of biodiversity importance including change in priority habitats and species and change in areas designated for their environmental value
  - % of SSSI's in favourable condition
  - Renewable energy capacity installed by type

### **Appendix 1: Compliance with the requirements for the environmental report under the 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 1.3-2.3.2 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	Framework update April 2010
c) the environmental characteristics of areas likely to be significantly affected	Framework update April 2010 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	Framework update April 2010
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 3.4 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 1.3.1-1.3.4 and 3.2.1-3.2.3 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 Appraisal – Objectives and Assessment Criteria

Sustainability Appraisal Framework (2010) – Summary of SA Objectives & Assessment Criteria	
ISSUE & SUSTAINABILITY OBJECTIVE	ASSESSMENT CRITERIA: “What contribution does the policy make to...”
<b>1 Natural Resources &amp; Climate Change</b> To protect the quality and minimise the consumption of natural resources, and minimise emissions to address the causes of climate change	Minimising the need to travel?
	Reducing the reliance on, and the consumption of, finite fossil fuels in transport and reducing emissions?
	Reducing the reliance on, and the consumption of, finite fossil fuels through energy efficiency in development?
	Improving air quality?
	Reducing final disposal of waste, including avoiding waste, re-using and recycling?
	Reducing the extraction of minerals and increasing the use of recycled aggregate?
	Maintaining and enhancing water quality?
	Conserving water resources?
	Re-using brownfield land, vacant sites and buildings?
	The density of development?
<b>2 Flood Risk</b> To reduce flood risk from all sources of flooding	Avoiding development in flood risk areas?
	Managing flood risk on sites at risk of flooding?
	Minimising the impact of development on the city’s sewer system?
<b>3 Biodiversity</b> To make sure that the city’s most important wildlife species and habitats are protected and enhanced	Maintaining and/or improving the condition of internationally, nationally and locally designated nature conservation sites?
	Safeguarding the role of non-designated sites in supporting wildlife in the city?
<b>4 Landscape &amp; Townscape Quality</b> To preserve and enhance the character and appearance of the city and its surroundings, including its built-up areas and its open spaces	The quality / appearance of the built environment?
	Fostering positive perceptions of the city’s attractiveness?
	To protecting and enhancing the greenness of the city, by improving the quality and quantity of open spaces and trees?
<b>5 Heritage</b> To protect and conserve Portsmouth’s historic, cultural and maritime heritage	Maintaining and protecting conservation areas?
	Maintaining and protecting listed buildings and scheduled ancient monuments and their settings?
<b>6 Homes for Everyone</b> To ensure that good quality housing is readily available and attainable to all those who need it	Delivering sufficient housing numbers to satisfy overall housing need within the city?
	Delivering sufficient affordable housing units to satisfy the needs of those on lower incomes?
	Ensuring an appropriate mix and balance of housing types and tenures across the city and at neighbourhood level?
	Promoting good quality homes that will stand the test of time?
<b>7 Education, Employment &amp; Economy</b> To ensure that the city’s economy is buoyant and diverse, and to develop and maintain a skilled workforce to support long-term competitiveness	Employment levels?
	Supporting new and existing businesses?
	Economic growth?
	Maintaining and enhancing the appeal of Portsmouth’s visitor attractions?
	The provision of adequate education & training facilities?
	Creating opportunities to increase the skills level of the local population?
<b>8 Health &amp; Wellbeing</b> To promote standards of health within the city’s population and to make Portsmouth a city where everyone feels safe and is safe	Improving people’s perception of their own health?
	Improving the health of the city’s population?
	Increasing opportunities for healthy pursuits?
	Ensuring access to adequate healthcare facilities?
	Reducing Health inequalities?
	Reducing danger to all road users and the potential for accidents?
	Reducing the fear of crime and levels of crime, in particular violent crime and anti-social behaviour?

<b>9 Culture, Leisure &amp; Recreation</b> To ensure that there are opportunities for everyone to participate in fulfilling healthy and rewarding leisure activities to suit a full range of needs and interests	Ensuring that everyone has easy access to pleasant, multi-functional green spaces across the city? (NB sports facilities are covered in 'health' objective)
	Ensuring that all the city's children have easy access to a high quality play area?
	Ensuring that the city maintains adequate cultural and entertainment facilities to satisfy residents' expectations
<b>10 Social Inclusion &amp; Quality of Life</b> 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	Maintaining the role of the city's town and local centres and ensuring their continued vitality and viability?
	Ensuring that as many people as possible have good access to shops and services?
	Reducing concentrations of social disadvantage in certain areas of the city?

**Appendix 3: Determinants of health** (Bold denotes those most relevant to LDF)  
Health Impact Assessment.

Ison, E. (2002) Rapid appraisal tool for

Lifestyle	Personal circumstances	Access to services, facilities and amenities
<ul style="list-style-type: none"> <li>• Diet</li> <li>• <b>Exercise and physical activity</b></li> <li>• Smoking habit</li> <li>• Exposure to passive smoking</li> <li>• Alcohol intake</li> <li>• Dependency on prescription drugs</li> <li>• Illicit drug and substance use</li> <li>• Sexual behaviour</li> <li>• Other health-related behaviours, such as tooth-brushing, bathing, and food preparation</li> <li>• <b>Travel choices</b></li> <li>• <b>Where you work in relation to where you live</b></li> </ul>	<ul style="list-style-type: none"> <li>• Structure and cohesion of family unit</li> <li>• Parenting</li> <li>• Childhood development</li> <li>• Life skills</li> <li>• <b>Personal safety</b></li> <li>• <b>Employment status</b></li> <li>• Working conditions</li> <li>• Level of income, including benefits</li> <li>• Level of disposable income</li> <li>• <b>Housing tenure</b></li> <li>• <b>Housing conditions</b></li> <li>• Educational attainment</li> <li>• <b>Skills levels including literacy and numeracy</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>to Employment Opportunities and Workplaces</b></li> <li>• <b>to Housing</b></li> <li>• <b>to Shops (to supply basic needs)</b></li> <li>• <b>to Amenities (e.g. bank, Post Office)</b></li> <li>• <b>to Community facilities</b></li> <li>• <b>to Public transport</b></li> <li>• <b>to education, training and skills development</b></li> <li>• <b>to Healthcare</b></li> <li>• <b>to Social Services</b></li> <li>• <b>to Childcare</b></li> <li>• <b>to Respite Care</b></li> <li>• <b>to Leisure and recreation services and facilities, including open space</b></li> </ul>

Social Factors	Economic Factors	Environmental Factors
<ul style="list-style-type: none"> <li>• <b>Social contact</b></li> <li>• Social support</li> <li>• <b>Social cohesion</b></li> <li>• Neighbourliness</li> <li>• Participation in the community</li> <li>• Membership of community groups</li> <li>• Reputation of community/area</li> <li>• Participation in public affairs</li> <li>• <b>Level of crime and disorder</b></li> <li>• <b>Fear of crime and disorder</b></li> <li>• Level of antisocial behaviour</li> <li>• Fear of antisocial behaviour</li> <li>• Discrimination</li> <li>• Fear of discrimination</li> <li>• <b>Public safety measures</b></li> <li>• <b>Road safety measures</b></li> </ul>	<ul style="list-style-type: none"> <li>• Creation of wealth</li> <li>• Distribution of wealth</li> <li>• <b>Retention of wealth in local area/economy</b></li> <li>• Distribution of income</li> <li>• Business activity</li> <li>• <b>Job creation</b></li> <li>• <b>Availability of employment opportunities</b></li> <li>• <b>Quality of employment opportunities</b></li> <li>• <b>Availability of education opportunities</b></li> <li>• Quality of education opportunities</li> <li>• <b>Availability of training and skills development opportunities</b></li> <li>• Quality of training and skills development opportunities</li> <li>• Technological development</li> <li>• <b>Amount of traffic congestion</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Air quality</b></li> <li>• <b>Water quality</b></li> <li>• <b>Soil quality/Level of contamination</b></li> <li>• <b>Noise, odour, vibration levels</b></li> <li>• <b>Hazards</b></li> <li>• <b>Land use</b></li> <li>• <b>Natural habitats and Biodiversity</b></li> <li>• <b>Landscape, including green and open spaces</b></li> <li>• <b>Townscape, including civic areas and public realm</b></li> <li>• <b>Use/consumption of natural resources</b></li> <li>• <b>Energy use: CO2/other greenhouse gas emissions</b></li> <li>• <b>Solid waste management</b></li> <li>• <b>Public transport infrastructure</b></li> <li>• <b>Active travel infrastructure</b></li> <li>• <b>Flood Risk</b></li> </ul>

## **Appendix 4: Compatibility of Plan Objectives with Sustainability Objectives**

### **Core Strategy Objectives: \***

#### **To make Portsmouth an attractive and sustainable city**

This objective addresses the issues of the quality of the urban and natural environment and will be achieved through:

- aspiring to high architectural quality and protecting the local architectural heritage;
- improving public realm to enhance city life especially at the seafront, the city centre, Southsea town centre and Fratton, North End, Albert Road & Elm Grove and Cosham district centres.;
- greening the city through developing on brownfield sites, protecting existing green and open spaces and creating a green network through the city.
- protecting biodiversity and nature conservation areas and, where possible, improving their condition, in particular Portsmouth and Langstone Harbours, which are internationally designated;
- using sustainable design and construction techniques as well as exploiting opportunities for generating and incorporating renewable energy technologies;
- seeking to continue the trend of highly accessible shops and services by focussing development on large strategic sites which include the provision of services and links to the rest of the city and smaller sites in accessible locations; and
- developing our strategic sites of Tipner, Port Solent, Horsea Island, Somerstown & North Southsea and the city centre for homes, employment, leisure and retail.

#### **To make Portsmouth an accessible city with sustainable and integrated transport**

This objective address the issue of transport and will be achieved by:

- focussing developments around town centres and public transport routes so that communities have easy access by a choice of modes of transport for getting around the city and are within easy reach of goods and services;
- focussing travel around the city on cycling, walking and public transport making the most of the city's compact and flat geography and mild climate;
- requiring travel plans from new residential developments, businesses, shops and schools;
- improving the city's transport hubs and interchanges such as a train/bus interchange at Portsmouth & Southsea train station and physical improvements to the Hard interchange at Portsmouth Harbour;
- working with the sub region as part of TfSH to ensure networks are enhanced and managed efficiently;
- working with partners to improve the public transport system within the city and connecting the city to adjacent areas of Fareham, Gosport, Havant and the Strategic Development Areas; and
- developing a Premium Bus network and a bus rapid transit linking Fareham, Gosport, and Havant with Portsmouth and improved access to Port Solent, Horsea Island and Tipner.

## **To develop Portsmouth as a city of innovation and enterprise, with a strong economy and employment opportunities for all**

This objective addresses the issues of accommodating the development, improving employment opportunities and promoting the city centre. The objective will be achieved through:

- enlarging and improving the city centre so Portsmouth can offer a high quality shopping experience, businesses premises, a cultural / civic area, a choice of restaurants/ bars/cafes, tourist activities & accommodation and city centre living;
- supporting our other town centres of Southsea, Fratton, North End, Albert Road & Elm Grove and Cosham so that they remain viable and vibrant;
- ensuring there is an available pool of skilled labour through raising and diversifying the skills of the local population and attracting graduates and skills from outside;
- providing additional employment land mainly along the western corridor of the city, with a focus on the city centre, and the existing industrial areas on the eastern side of the city;
- developing an office market in the city centre through highlighting development opportunities, improving transport and encouraging supporting uses such as hotels to the area;
- protecting the city's large industrial estates so that they are improved and retained for employment uses;
- supporting development that strengthens the marine sector and supports the commercial port;
- improving the visitor experience especially around the Hard where better links will be made between the visitor destinations of the Historic Dockyard, Gunwharf Quays and the seafront. and
- providing tourist related facilities, including hotels, to support the visitor industry in the areas linked to the city's waterfront and maritime heritage.

## **To make Portsmouth a city in which everyone feels and is safe**

This objective mainly addresses the issue of flood risk and also that of improving the quality of the urban environment. The objective will be achieved by:

- reducing flood risk in the city by improving flood defences, promoting development in lower flood risk areas first, ensuring that the siting, design and layout of developments mitigate against flooding and implementing sustainable drainage systems;
- improving community safety through designing developments to reduce opportunities for crime, ensuring safe walking routes in the city, working with transport operators to provide safe public transport and improving our green and open spaces so people feel safe in them; and
- encouraging uses in town centres that are open into the evening.

## **To deliver affordable / quality housing where people want to live**

This objective tackles the issues of accommodating development and housing mix & affordable housing and will be achieved by:

- providing homes, depending on infrastructure provision, to meet the needs of the existing and new population;
- ensuring that the types of homes built meet the city's needs; and
- creating quality places to live where facilities and services are close to new housing, developments are well designed to high environmental standards and open spaces are provided or improved as part of developments.

### **To encourage and enable healthy choices for all and provide appropriate access to health care and support**

This objective tackles the issues of health inequalities and can be achieved through:

- making it easier for people to adopt healthier lifestyles through active travel, and ensuring there are enough play and open spaces for people to exercise and relax;
- improving access to and enhancing the seafront to increase people's use of the area for exercise and relaxation;
- targeting regeneration initiatives at the most deprived neighbourhoods to reduce health inequalities and social deprivation; and
- working with the local Primary Care Trust to fill identified gaps in healthcare provision.

### **To enhance Portsmouth's reputation as a city of culture, energy and passion offering access for all to arts, sport and leisure**

This objective will be achieved through:

- promoting the city as a major tourist destination with its attractions of the waterfront, historic dockyard, Spinnaker Tower and museums & theatres;
- upgrading and improving the seafront and its facilities while maintaining its open and traditional character;
- celebrating the local football club and supporting the club's desire for a new stadium at Fratton Park;
- protecting open spaces and the natural environment and providing a new country park on the former Paulsgrove Tip to offer healthy recreational opportunities for Portsmouth's communities; and
- improving the character and offer of our city and town centres.

### **To ensure there is adequate supporting infrastructure for the new development and growth of the city**

This objective tackles the issues of accommodating development and transport and will be achieved by:

- identifying needs created by additional development in the city and ensure it is delivered;
- using the council's community infrastructure levy (as set out in our charging schedule 2011) to ensure new development, together with public funding, contributes fairly towards the provision of infrastructure;
- exploring new funding initiatives such as Tax Incremental Funding (TIF) or Local Asset Backed Vehicles (LABV) to finance infrastructure provision; and

- producing an infrastructure delivery plan to set out details on what infrastructure is needed, how much it will cost, how it will be funded and who is responsible for providing the infrastructure.

\* for SA objectives see Appendix 2



**Appendix 5: Sustainability Appraisal of three broad options put forward at Issues & Options 2007**

Sustainability Objectives	Effects of Option 1 (greener development)	Reason for Score
1 Climate Change & Emissions	✓	Minimises the need to travel and therefore emissions, given new employment and housing is to be located in close proximity to transport nodes and activity centres; developing better public transport systems may become more viable; Implementation of PUSH sustainability policy with renewable energy requirements on all sites would reduce emissions.
2 Natural Resources	(✓)	Implementation of PUSH sustainability policy with renewable energy requirements on all sites would reduce the use of natural resources; but no particular emphasis on reducing the use of finite resources.
3 Coast & Water	(✓)	Notwithstanding the sequential approach to flood risk in allocating land for housing and employment, focusing development on the activity centres as proposed in this scenario broadly aligns the areas of lowest flood risk.
4 Biodiversity	✓	Development will contribute to greening the city and increasing biodiversity.
5 Land	✓	By the nature of the city all new development will be on previously developed land, thus maximising the use of the city's finite land supply
6 Landscape & Townscape Quality	✓	Characterisation study would seek to influence design policies to ensure the form of future development is in line with existing patterns of development; There will be an emphasis on good design; A 'percent for art' scheme will provide more public art; Development itself will contribute to greening the city; Maintains traditional scale of development along the seafront.
7 Heritage	✓	Maintains traditional scale of development along the seafront; Comprehensive conservation policy framework ensures the active protection of the historic environment.

Sustainability Objectives	Effects of Option 1 (greener development)	Reason for Score
8 Homes for Everyone	?	Characterisation study will identify areas to meet the need for larger housing, however, the consequent design guidelines may discourage a mix of housing types in some areas; Policies on design and sustainable construction will lead to better quality housing.
9 Employment & Economy	?	Accessibility of jobs to local communities is safeguarded by providing employment close to housing areas; Skills development and job opportunities will be focused in the area of greatest deprivation through regeneration schemes; Focus of development around town centres will strengthen their role and ability to attract a diverse range of uses and new businesses; However, this scenario has no particular focus on the economy and the promotion of all uses in centres and around transport corridors could increase competition between land uses in these areas, and employment uses could lose out, especially to housing; Potential for growth at Gunwharf Quays and The Hard would be limited; Allowing small-scale town centre uses to locate out of centre could have a small impact on the vitality and viability of existing centres.
10 Education & Lifelong Learning	(✓)	Medium and large schemes may use local labour and enhance skill development in the area of greatest deprivation.
11 Health & Well-being	?	Regeneration would be broadly targeted at those areas where health is poorest; Location of development reduces the need to travel and is therefore likely to increase levels of walking and cycling; However, location of new housing around centres and transport corridors may expose increased numbers of people to poor air quality.
12 Leisure & Recreation	?	Promoting the close proximity of uses to each other in centres and along transport corridors, which could mean increased competition between land uses, where leisure could lose out to other uses; This scenario allows for a varied evening economy offer in different parts of the city.
13 Quality of	✓	Design policies can help ensure that crime prevention is designed into new development and

Sustainability Objectives	Effects of Option 1 (greener development)	Reason for Score
Life		will help ensure a pleasant urban environment; quality of life in Portsmouth's most deprived areas will be improved through targeted regeneration; Option focuses on the creation of sustainable communities, where quality of life is key.
14 Social Inclusion & Community Satisfaction	?	Reducing the need to travel will enable better access to services and facilities for all; regeneration efforts focused on the poorest area may have benefits for community cohesion and improve civic pride, but conversely other parts of the city will not be targeted and residents may perceive that they are being neglected.

Sustainability Objectives	Effects of Option 2 (dispersed development)	Reason for Score
1 Climate Change & Emissions	(?)	Some positive impacts through the given policy framework, but scenario does not take a very strong stance on sustainable design and construction. Lenient approach to the location of new housing and promotion of employment clusters may mean that opportunities to reduce the need to travel and hence emissions will be missed. More dispersed development reduces opportunities to implement high quality public transport to reduce unnecessary car use.
2 Natural Resources	(✓)	Implementation of PUSH sustainability policy framework will improve energy and water efficiency but no particular emphasis on reducing the use of finite resources.
3 Coast & Water	(✗)	Notwithstanding the sequential approach to flood risk in allocating land for housing and employment, the lenient approach to new development all across the city proposed in this scenario may increase the numbers at risk from flooding.
4 Biodiversity	∅	No direct relationship between the proposed scenario and this objective.
5 Land	✓	By the nature of the city all new development will be on previously developed land, thus maximising the use of the city's finite land supply.

Sustainability Objectives	Effects of Option 2 (dispersed development)	Reason for Score
6 Landscape & Townscape Quality	?	Only limited design policies, no site specific guidelines; No particular restrictions on the built form on the seafront but allowing for opportunities for good, innovative design to come forward.
7 Heritage	(*)	No particular restrictions on built form on the seafront; no formal status of conservation area guidelines or protection of locally important buildings through the LDF.
8 Homes for Everyone	?	No specific requirements for design or types of dwellings may mean a poorer mix, may not meet the housing needs of the local population, but at the same time may encourage developers to supply more housing in the city.
9 Employment & Economy	?	Scenario has an economic focus, prioritising the economic development of the city. Scenario builds on the existing strengths of the local economy. Increased leisure offer on the southern waterfront could help attract visitors and increase spend in the local economy. Incorporating Gunwharf Quays and the Hard into the city centre could potentially impact on the area around Commercial Road and other retail centres. Missed opportunity to develop a strong design framework which can help create attractive environments that stimulate investor confidence.
10 Education & Lifelong Learning	∅	The option has no particular focus on education.
11 Health & Well-being	?	The option has no particular focus on reducing the need to travel, which may encourage driving rather than cycling and walking; conversely, in spreading development across the city, development in areas of poor air quality could be avoided.
12 Leisure & Recreation	?	The southern waterfront could become a focus for commercial leisure operations helping to develop the city's leisure and tourism offer. Scenario will not ensure a varied evening economy offer.
13 Quality of	?	The lack of regeneration focus could lead to greater levels of deprivation in the worst

Sustainability Objectives	Effects of Option 2 (dispersed development)	Reason for Score
Life		identified areas, although the city wide spread of funds could help to lift the quality of life across the whole city and in smaller not easily identifiable pockets of deprivation. The scenario's main focus on the economy may help attract people to work in the city.
14 Social Inclusion & Community Satisfaction	(✖)	The scenario does not require development to be accessible, which could lead to unequal access to facilities and services and poorly connected neighbourhoods. Conversely there could be localised benefits from the citywide spread of all types of development. The scenario could promote commercial leisure operations, which are not free at the point of access, thereby creating inequalities in people's ability to access recreation opportunities.

Sustainability Objectives	Effects of Option 3 (balanced approach)	Reason for Score
1 Climate Change & Emissions	(✓)	Would not actively pursue the creation of sustainable communities that help to reduce the need to travel, but the option would require development to be accessible by sustainable modes of transport. Implementation of PUSH sustainability policy and renewable energy requirements in larger sites would reduce emissions.
2 Natural Resources	✓	Implementation of PUSH sustainability policy and renewable energy requirements in larger sites would reduce the use of natural resources; but no particular emphasis on reducing the use of finite resources.
3 Coast & Water	✓	The sequential approach to flood risk in allocating land for housing and employment seeks to reduce flood risk.
4 Biodiversity	∅	No direct relationship between the proposed scenario and this objective.
5 Land	✓	By the nature of the city, all new development will be on previously developed land, thus maximising the use of the city's finite land supply.

Sustainability Objectives	Effects of Option 3 (balanced approach)	Reason for Score
6 Landscape & Townscape Quality	?	No specific design advice proposed, only basic design parameters proposed for all developments, although more detailed policies will be set for landmark sites and town centres. Requirement for housing mix could lead to incongruous development in some areas.
7 Heritage	(✓)	Updated planning guidance on historic townscape will improve protection; the type of built form along the whole of the seafront plus guidelines for specific development sites will ensure good quality buildings. However, significant development on those key sites could impact on the traditional character of the area.
8 Homes for Everyone	(✓)	Percentage policy will ensure mix of housing types on larger sites and will help to create mixed and balanced communities with a variety of occupants. Will not apply to small sites.
9 Employment & Economy	(✗)	Employment uses would have to compete with each other for land, which could lead to the loss of some employment uses to others; key sites on the seafront could improve the tourist and leisure offer and increase visitor spend. Incorporating Gunwharf Quays and the Hard into the city centre could potentially impact on the area around Commercial Road and other retail centres; Allowing small-scale town centre uses to locate out of centre could have a small impact on the vitality and viability of existing centres.
10 Education & Lifelong Learning	(✓)	Medium and large schemes may use local labour and enhance skill development in the area of greatest deprivation.
11 Health & Wellbeing	(✓)	In spreading development across the city, areas of poor air quality could be avoided.
12 Leisure & Recreation	(✓)	Development of key sites on the seafront could improve the tourist and leisure offer. This option allows for a varied evening economy offer in different parts of the city.
13 Quality of Life	✓	Targeted regeneration can alleviate identified inequalities across the city.

Sustainability Objectives	Effects of Option 3 (balanced approach)	Reason for Score
14 Social Inclusion & Community Satisfaction	?	Would not actively pursue the creation of sustainable communities that help to reduce the need to travel, but the scenario would require development to be accessible by a number of modes of transport, allowing those without access to a car to get to services and facilities. Commercial leisure operations on the southern waterfront, which are not free at the point of access, could create inequalities in people's ability to access recreation opportunities.

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

## Appendix 6 – SA of the Regulation 27 stage of the Core Strategy

PCS1 Tipner			
Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	?	Developing Tipner for at least 480 dwellings with associated local shops and services will generate more transport movements both on site and in the local area. Furthermore, the provision of infrastructure needed so that development can take place, such as a new junction with the M275, will also increase the amount of traffic in the city. However, the development will regenerate an area of contaminated land located at a major gateway to the city. It will also be developed at density levels which will ensure the most effective use of the land is made.	Despite the uncertain score, no change is needed to the policy. Tipner is a vital strategic site and will need to be developed if Portsmouth is going to deliver appropriate levels of new housing over the plan period. Furthermore, apart from the city's other strategic sites, there are no other options for sites within the city boundary that can deliver this amount of housing. Other policies in the Portsmouth Plan, such as sustainable design and construction, will mitigate adverse environmental impacts of new development whilst the upgrades in transport infrastructure should ensure the city's road network is not adversely affected by this development.
2 Flood Risk	(✓)	Tipner is located within flood risk zones 2 and 3. However, the policy requires that any development on site needs to provide appropriate flood risk management measures and will require surface and foul water drainage to be separated out on site and either discharged into the sea or kept in attenuation tanks. Furthermore, the planned cross city sewer connection will increase sewer capacity on site.	Despite being located in a flood risk area, mitigation is built into the policy so that development must consider flood risk issues. Furthermore, evidence shows that development in flood risk areas in Portsmouth cannot be avoided given that the city does not have enough suitable sites in non-flood risk areas to provide appropriate levels of housing.
3 Biodiversity	?	Tipner is adjacent to Portsmouth Harbour which is designated as an SPA, RAMSAR and SSSI. The policy requires an Environmental Impact Assessment and Appropriate Assessment to be carried out at the planning application stage to ensure nature conservation interests are protected and enhanced.	As noted above, Tipner is a vital site for the delivery of new housing in the city. The nature conservation interests of Portsmouth Harbour SPA, RAMSAR and SSSI will be protected by the required EIA and AA at the planning application stage. However, since no details are currently available on the type or form of development that will take place at Tipner (outside of the existing planning application for a section of the site) the overall impact remains uncertain. The A Greener Portsmouth policy will also ensure the protection of biodiversity features at internationally, nationally and locally designated sites.
4 Landscape & Townscape Quality		Tipner is a prominent gateway site into the city and is home to various insalubrious uses including a disused Greyhound stadium, aggregates wharf and scrap yard. The new development offers the potential to significantly improve the built environment and therefore the first impressions of	No change is needed. The Design and Conservation policy will also help to ensure the highest architectural standards are delivered on site.

	✓	Portsmouth given to visitors to the city. Development will also improve access to the waterside and provide new public open space.	
5 Heritage	✓	The policy will ensure that the listed buildings at Tipner Point will be retained and repaired. Furthermore, improvements to the surrounding built environment will help to improve the setting of these buildings.	No change needed.
6 Homes for Everyone	✓	Tipner is a strategic site for delivering new housing in the city. Except from the other identified strategic sites, there is nowhere else in the city that can provide the land for significant numbers of new dwellings.	Policies such as Housing mix, size and provision of affordable homes will ensure the right balance of tenures is achieved on site. The design and conservation and sustainable design and construction policies will ensure new development on site will provide good quality homes.
7 Education, Employment & Economy	(✓)	The policy makes provisions for developing 25,000m <sup>2</sup> of B1 office space at Tipner. This would help to provide new jobs in the city and support economic growth. However, this office development is dependent on sufficient supporting infrastructure. New housing in the city will also help to support a growing economy.	No change needed. The uncertainty in the score reflects the need for infrastructure provision to be provided before employment can be brought forward on site.
8 Health & Wellbeing	∅	There is no direct impact on this objective.	No change needed.
9 Culture, Leisure & Recreation	(✓)	The policy will help to deliver new facilities in the area for cycling and walking. Public open space and access to the waterfront will also be provided.	No change needed. Whilst access will be improved to the waterfront on site, the type of cultural or leisure activity may be limited in order to avoid disturbance of the Portsmouth Harbour SPA.
10 Social Inclusion & Quality of Life	∅	There is no significant impact on this sustainability objective.	No change needed.

## PCS2 Port Solent and Horsea Island

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate		In order to provide a higher number of houses on site, a bridge link from Port Solent and Horsea Island to Tipner will be needed. This will increase the amount of traffic in the area. Furthermore, if the lower number of housing was	Despite the negative score, no change is needed to the policy. Port Solent and Horsea Island is a vital strategic site and will need to be developed if Portsmouth is going

Change	x	delivered on site (500 at Port Solent only if funding for the bridge link does not come forward) this would still generate more traffic on the A27 and within Port Solent itself.	to deliver appropriate levels of new housing over the plan period. Furthermore, apart from the city's other strategic sites, there are no other options for sites within the city boundary that can deliver the required amount of housing. At the lower development figure, the policy does require some highway improvement works to accommodate 500 proposed dwellings. However, this will still have an adverse impact on the minimising the need to travel criteria in this sustainability objective.
2 Flood Risk	(✓)	Some parts of both Port Solent and Horsea Island are located within flood risk zones 2 and 3. However, the policy requires that any development on site needs to provide appropriate flood risk management measures for a 1 in 1000 year event and will require surface and foul water drainage to be separated out on site and either discharged into the sea or kept in attenuation tanks. Furthermore, the planned cross city sewer connection will increase sewer capacity on site.	Despite being located in a flood risk area, mitigation is built into the policy so that development cannot take place without appropriate flood risk measures. Furthermore, development in flood risk areas in Portsmouth cannot be avoided given that the city does not have enough suitable sites in non-flood risk areas to provide appropriate levels of housing.
3 Biodiversity	?	Port Solent and Horsea Island are adjacent to Portsmouth Harbour which is designated as an SPA, RAMSAR and SSSI. The policy requires an Environmental Impact Assessment and Habitats Regulation Assessment to investigate the impact of development on local wildlife, and to consider necessary mitigation. Marina Keep (an important Brent Goose site) will also remain undeveloped and protected.	As noted above, Port Solent and Horsea Island are vital for the delivery of new housing in the city. The nature conservation interests of Portsmouth Harbour SPA will be protected by the required EIA and HRA. However, since no details are currently available on the type or form of development that will take place on site the overall impact of development at this site remains uncertain. The A Greener Portsmouth policy will also ensure the protection of biodiversity features at internationally, nationally and locally designated sites.
4 Landscape & Townscape Quality	✓	The landscape and townscape quality at Port Solent would be maintained and enhanced by new development. The new country park and the retention of Marina Keep will also help to improve the quality of the built environment and help make this area of the city more attractive.	No change is needed. The Design and Conservation policy will also help to ensure the highest architectural standards are delivered on site.
5 Heritage	∅	Although there are no listed buildings or conservation areas in Port Solent or Horsea, any new development will need to consider the impact on, and views to, Portchester Castle.	No change needed.
6 Homes for Everyone	✓	Port Solent and Tipner are strategic sites for delivering new housing in the city. Except from the other identified strategic sites, there is nowhere else in the city that can provide the land for significant numbers of new dwellings. New housing on this site will increase the opportunity for people to have their own homes and contribute toward meeting the city's housing need.	Policies such as Housing mix, size and provisional of affordable homes will ensure the right balance of tenures is achieved on site. The design and conservation and sustainable design and construction policies will ensure new development on site will provide good quality homes.

7 Education, Employment & Economy	(✓)	The policy ensures the protection of the marina which will safeguard existing businesses on site. Furthermore, the Boardwalk will be designated as a local centre. This will support existing businesses whilst encouraging further growth at Port Solent.	No change needed.
8 Health & Wellbeing	∅	There is no direct impact on this objective.	No change needed.
9 Culture, Leisure & Recreation	(✓)	The policy will help to safeguard the future of the Port Solent marina which is an important leisure facility in the city. The provision of the country park and the protection of Marina Keep will also ensure a good amount of green and open spaces in this part of the city for the enjoyment of local residents.	No change needed.
10 Social Inclusion & Quality of Life	✓	The designation of the boardwalk as a local centre, and the provision of local services such as a doctors surgery or dental practice, will ensure local residents have access to local services and that the boardwalk receives the necessary support to maintain its vitality and viability.	No change needed.

### PCS3 Lakeside Business Park

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	?	The provision of 69,000m <sup>2</sup> of new office space in this location will result in more people travelling to this area. Some of the office development may also result in a loss of open green space at this site.	No change is needed. Although in an out-of-centre location, this is historically an important site for office use in Portsmouth. Expansion of this site is considered acceptable given the need for more offices in the city and a lack of suitable alternative sites. Furthermore, Portsmouth is a compact and generally very accessible city, and provided that the balance of office space remains in favour of in-centre locations, the city council does not consider that some out-of-centre office provision will have detrimental effects. The city centre will continue to be promoted as an office hub.
2 Flood Risk	✓	The site is located within flood zone 3 in a low to medium hazard area, and there are also noted drainage issues. New development is required by the policy to provide flood mitigation measures, sewage infrastructure and	Given the mitigation required in the policy, no change is needed.

		sustainable drainage systems.	
3 Biodiversity	x	Development may result in the loss of some non-designated green open space and trees.	This is an important site that will provide some 40% of the office floorspace that the core strategy seeks to deliver up to 2027. As noted in the above policies, Portsmouth has a dearth of large sites capable of providing for this size of development. It is noted that the open space on site has value for biodiversity despite not being a designated site. The recently approved outline application requires a Landscape and Wildlife management plan on condition to ensure biodiversity interests are taken into account. This indicates the council's commitment to biodiversity on this site.
4 Landscape & Townscape Quality	?	The built environment will be improved by well designed new office buildings. This will also help improve the attractiveness of the built environment in the north of the city, especially when viewed from busy parts of the strategic road network. However, the loss of some open space may be considered to be a negative impact on this part of the city.	No change is needed. Uncertainty relates to the consideration of how people perceive landscape or quality new development in terms of attractiveness.
5 Heritage	∅	There is no direct impact on this objective.	No change needed.
6 Homes for Everyone	∅	There is no direct impact on this objective.	No change needed.
7 Education, Employment & Economy	✓	New office space on this site will help to increase the number of new jobs and businesses in the city which will have a positive impact on economic growth both in the city and at a sub-regional level. It is also possible that new businesses may result in training for employees which would enhance the skill levels in some of the local population.	No change needed.
8 Health & Wellbeing	∅	There is no direct impact on this objective.	No change needed.
9 Culture, Leisure & Recreation	∅	There is no direct impact on this objective.	No change needed.

10 Social Inclusion & Quality of Life	∅	There is no direct impact on this objective.	No change needed.
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### PCS4 Somerstown and North Southsea

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	(✓)	Community facilities, local shops and services and employment uses in the area will be concentrated. This will mean that whilst some residents may have further to travel, facilities will be within easy reach of others. Overall, however, the safeguarding of these facilities will reduce the need to travel to other areas of the city. Whilst the policy may result in a net increase in the amount of local residents, clear routes will be created through the area providing more opportunity for walking and cycling. The supporting AAP requires new development to be of the highest quality in terms of design and energy efficiency. This is also supported through the sustainable design and construction and the design and conservation policies in the core strategy. Much of the redevelopment will also take place on previously developed land.	No change is needed. Uncertainty exists at the time of writing, however, as the future of the AAP has not been finalised following a withdrawal of PFI funding. Policies in the core strategy should ensure new development is of the highest quality and is sustainable in terms of this objective. The site is also in close proximity to the city centre meaning it is very accessible.
2 Flood Risk	✓	New development is not proposed within flood risk zones. Sustainable drainage measures to control the rate of discharge of both surface and foul water are also required.	No change is needed.
3 Biodiversity	(✓)	New usable open space will be created and existing areas will be improved therefore maximising biodiversity potential in the area.	No change needed. The Appropriate Assessment for the AAP concluded that any negative impacts in relation to the conservation objectives of the European Sites had effectively been removed by the process.
4 Landscape & Townscape Quality	✓	The landscape and townscape quality of Somerstown and North Southsea will be improved by this policy given the overall aim of the policy is to improve the look and feel of the area. Landscape quality will be improved by the provision of more green spaces in the area.	No change is needed.
5 Heritage		The AAP requires any new development to be of the highest quality, whilst provisions in the core strategy will ensure that the character and setting of any listed building is protected or enhanced by new development.	No change needed.

	✓		
6 Homes for Everyone	✓	This policy aims to deliver an overall increase of a minimum of 539 homes in Somerstown and North Southsea, which will contribute to providing for the housing need in the city. The AAP and the core strategy contain policies to ensure an appropriate mix of tenure and size to increase the choice of housing for the city's residents and to promote mixed and balanced communities. The policy will also result in the redevelopment of some of the poorer developments in the area, replacing them with well designed and sustainable developments that will stand the test of time.	No change is needed.
7 Education, Employment & Economy	∅	The policy seeks to retain and consolidate employment uses in the area. This may have a detrimental impact on businesses that are required to change location, but could also create opportunities for new business. The policy is unlikely to have a direct impact on the city's visitor attractions, education and training facilities or skill levels of the local population.	No change needed.
8 Health & Wellbeing	✓	It is likely that an improved physical environment in a balanced community will help to improve people's perceptions of their own health. Furthermore, new community facilities, open spaces and opportunities for cycling and walking could increase the amount of people taking part in healthy pursuits. New health facilities will also be provided as part of the community hub.	No change needed.
9 Culture, Leisure & Recreation	✓	Although some open space will be lost as part of redevelopment, new open spaces will be provided of a better quality, therefore outweighing the loss of the previous space. New children's play areas will also be provided, whilst existing play sites will be enhanced. Whilst the policy will have no direct impact on cultural and entertainment facilities, it should be noted that the new community facility could be used for various cultural and leisure activities.	No change needed.
10 Social Inclusion & Quality of Life	(✓)	The policy will protect the future of the local centres in the area, although some businesses may have to relocate from existing sites. Residents in this area are also very close to the city centre, and the policy will ensure access routes are improved. The mix of tenures of the new housing stock could help people to move out of social rented accommodation in this area.	No change needed.

PCS5 Fratton Park and the south side of Rodney Road

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	?	The policy supports sustainable travel to the football ground including cycling and walking. This may contribute to a reduction in fossil fuel use and improvements in air quality. Facilities will also be improved at Fratton station which will help to promote public transport use. However, any redevelopment of the ground will increase the existing capacity and encourage travel to the area. This could result in an increase in car use over existing levels and a reduction in air quality.	Development on this site will likely increase both fossil fuel consumption and air pollution. The provisions of the sustainable design and construction policy will ensure adverse impacts will be kept to a minimum, therefore no change is needed to the policy.
2 Flood Risk	∅	The policy does not have a significant direct effect on this objective.	No change needed.
3 Biodiversity	∅	The policy does not have a significant direct effect on this objective.	No change is needed.
4 Landscape & Townscape Quality	(✓)	Any new or redeveloped football stadium at Fratton Park is likely to have a positive visual impact on the surrounding landscape and townscape. It will also promote a positive vision to visitors to the city.	The Design and Conservation and Sustainable Design and Construction policies will further militate against any adverse impacts on this objective. No change is needed.
5 Heritage	(✓)	Ensuring the ground is redeveloped, and that the football club not only retain a home within the city but remain on their home site at Fratton Park, helps to protect the cultural heritage of Portsmouth Football Club and the city.	No change needed.
6 Homes for Everyone	∅	The policy does not have a significant direct effect on this objective.	No change needed.
7 Education, Employment & Economy	(✓)	The policy will maintain and safeguard the existing employment at the site, or ensure its re-provision should the land be required for the redevelopment of the football ground. It may also help support the local economy given the influx of away fans on match days.	No change needed.

8 Health & Wellbeing	∅	The policy does not have a significant direct effect on this objective.	No change needed.
9 Culture, Leisure & Recreation	(✓)	The policy ensures the retention of a cultural and entertainment facility within the city.	No change needed.
10 Social Inclusion & Quality of Life	(✓)	The redevelopment of a modern football stadium may increase the sense of pride in the city. It may also contribute to the viability and vitality of nearby town and local centres given the influx of away fans to the city on match days.	No change needed.

### PCS6 City Centre

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	(✓)	Enhancing the city centre and providing new retail space will reduce the need for Portsmouth residents to travel outside of the city for shopping. However, it could increase the amount of people travelling into the city which could have a negative impact on air quality. New development at the north of the city centre will however facilitate the reuse of derelict brownfield land.	Development in the city centre will likely increase both fossil fuel consumption and air pollution. The provisions of the sustainable design and construction policy will ensure adverse impacts will be kept to a minimum, therefore no change is needed to the policy. The location is also highly accessible by public transport.
2 Flood Risk	∅	Some areas of the city centre are in flood risk areas, primarily in The Hard.	The majority of the city centre is not in a flood risk area. The supporting SPD for The Hard area includes requirements for flood risk measures on at risk sites. No change needed.
3 Biodiversity	∅	The policy does not have a significant direct effect on this objective.	No change is needed.
4 Landscape & Townscape Quality		The redevelopment of the city centre north or market way would deliver a high quality and well designed retail destination in the heart of the city centre, replacing poorly designed buildings, transport networks and derelict	No change is needed.

	✓	brownfield land. This will create a positive impression of the city to both residents and visitors, especially those entering the city centre from the north. Contributions collecting for open space from new development may also contribute to improving the overall quality of green space in the city.	
5 Heritage	✓	The policy will ensure the continued protection and enhancement of the historic dockyard, as well as other listed buildings in the city centre including Saint Agatha's church. Development will also need to respect the character and appearance of the Guildhall and Victoria Park Conservation Area.	No change needed.
6 Homes for Everyone	✓	The policy makes provision for some 1600 new homes in the city centre.	No change needed. The provisions of the Housing Mix, Size, and provision of affordable homes policy will ensure an appropriate mix of dwelling size and tenure is provided. The sustainable design and construction and design and conservation policies will ensure a high quality development with dwellings that will stand the test of time.
7 Education, Employment & Economy	✓	The city centre will remain the retail hub of Portsmouth, and when expanded should also become a major sub-regional hub. This will ensure the protection of existing employment as well as significant growth in terms of growth and the economy. New office and hotel development will also contribute to the continued growth of the city. An expanded city centre will also bring more visitors to Portsmouth which may have a positive impact on other visitor attractions in the city. The city's university quarter will also be protected and enhanced which will have a positive benefit on local skills and education.	No change needed.
8 Health & Wellbeing	(✓)	People may benefit from being surrounded by a high quality built environment which would be delivered in new development in the city centre. New dwellings in the city centre would also introduce passive surveillance. This would be particularly important in the evening and may help to reduce the fear of crime and anti-social behaviour.	No change needed. The location and design of new dwellings will influence the degree of impact on passive surveillance in the city.
9 Culture, Leisure & Recreation	(✓)	An expansion of the city centre will enhance culture, leisure and recreation quality and possibility for residents of the city and the wider sub-region.	No change needed. Although more leisure and cultural opportunities will be provided, it is unlikely that every taste will be provided for.
10 Social Inclusion & Quality of Life	(✓)	Expanding and enhancing the role of the city centre could have a positive impact on the city's other local centres if more people are brought into the city, and it will also enhance the access to shops and services for the city's	No change needed.

		residents. However, it may also have an adverse impact if local residents become more inclined to go into the city centre rather than visit their district or local centres. Investment in the city centre is also likely to have positive benefits for residents of Portsea who may have more opportunity for employment.	
PCS7 District Centres			
Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	(✓)	Cycling and transport improvements in the district centres will make a positive contribution to cutting fossil fuel emissions and improving air quality. Furthermore, residential uses are encouraged within the centres. This will increase density levels, help reduce the need to travel and contribute to the reuse of brownfield land and vacant buildings for new housing development.	No change is needed.
2 Flood Risk	∅	This policy does not have a significant direct impact on this objective.	No change is needed.
3 Biodiversity	∅	This policy does not have a significant direct impact on this objective.	No change is needed.
4 Landscape & Townscape Quality	✓	The policy supports physical improvements to the public realm and the provision of public art and festivals within the district centres. This will help to improve the quality of the built environment, and foster positive perceptions of the city's attractiveness.	No change is needed.
5 Heritage	(✓)	The district centres have been used for shops and service provision for many years and are part of the city's cultural heritage. The policy will help to maintain these areas of the city whilst improving their vitality and viability. However, given there are relatively few protected or listed buildings in these areas, its impact on this part of the objective may be minimal.	No change needed.
6 Homes for Everyone	∅	This policy does not have a significant direct impact on this objective, although residential uses are encouraged at upper floors.	No change is needed.

7 Education, Employment & Economy	✓	The policy supports the existing businesses within the district centres whilst encouraging new businesses to locate to these areas. This will contribute to growth in the city's economy. Furthermore, some of the district centres are located in close proximity to the city's visitor attractions. Enhancing these areas will therefore also help to improve the image of tourism in the city.	No change is needed.
8 Health & Wellbeing	(✓)	The policy may contribute to limiting anti-social behaviour and the fear of crime given it promotes residential dwellings in appropriate places with the centre. This will help to maintain the vibrancy of an area after the shops have shut and increase the overlooking of an area. Furthermore, limits on the number of food and drink uses may also reduce anti-social behaviour in these areas.	No change is needed.
9 Culture, Leisure & Recreation	✓	Some of the district centres are located in close proximity to the city's visitor attractions. Enhancing these areas will therefore also help to improve the image of tourism in the city. Cultural and entertainment facilities located within the district centres are also protected by the policy which will help to meet resident's leisure expectations.	No change is needed.
10 Social Inclusion & Quality of Life	✓	Maintaining town and local centres will help to ensure their vitality and viability. Improving the facilities for shops and services in the district centres will also ensure that as many people as possible have access to them, and may help reduce concentrations of social disadvantage in certain areas of the city.	No change is needed.

### PCS8 Seafront

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	?	The policy seeks to improve the seafront, encouraging people to linger, walk and cycle. This may, however, attract greater numbers of visitors, who may travel by car. Encouraging small scale uses such as cafés and restaurants on the seafront could also mean that people make specific trips to the area to visit these uses. However, people already at the seafront may combine their trip with a visit to a café or restaurant, rather than driving to a different area of the city.	No change is needed. It is important to diversify the offer of the seafront area and make it easily accessible by all modes of transport. The type and nature of development that comes forward will largely dictate how people wish to travel to it.
2 Flood Risk	✓	The policy acknowledges the need for sea defences and requires them to integrate sensitively with the surrounding environment.	No change is needed.

3 Biodiversity	(✓)	The open spaces on the seafront are not particularly noted for their contribution to biodiversity, due to their very open and/or formal nature. Eastney Beach, which is covered by the policy, does have some significant local nature conservation value however which would be protected by the policy. The policy recognises the need for sea defences, which may have some adverse biodiversity impacts.	There is no need to alter the policy in relation to sea defences, as the policy merely recognises the need for a proposal made in other policies and proposals. The seafront policy seeks to make a positive contribution by requiring defences to integrate sensitively with the environment in which they are proposed.
4 Landscape & Townscape Quality	✓	The aim of the policy is specifically to enhance the area visually, both in terms of the buildings in the area and the public areas of the promenade and the open spaces whilst maintaining the open nature of the area, specifically around Southsea Common.	No change is needed - the design and conservation policy in the core strategy will further contribute towards this SA objective.
5 Heritage	✓	The seafront, particularly its western end, is part of the city's maritime heritage. The inclusion of this seafront policy exemplifies the city council's desire to protect and enhance this area.	No change needed - the design and conservation policy in the core strategy will further contribute towards this SA objective.
6 Homes for Everyone	∅	This policy does not have a significant direct impact on this objective.	No change is needed.
7 Education, Employment & Economy	✓	The seafront is a key part of the city's attraction to visitors who make a significant contribution to the city economy. The policy also seeks to make stronger links between the seafront and the nearby centres, which again could benefit the local economy.	No change is needed.
8 Health & Wellbeing	✓	Improving the seafront so that residents have an excellent outdoor area on their doorstep where they can walk, breathe fresh air or enjoy informal sports and games, will contribute to the aim of improving people's health and their perception of it.	No change is needed.
9 Culture, Leisure & Recreation	✓	The seafront already is a great leisure destination for the city's population. Improving this area, diversifying the range of services and events and protecting the open spaces will make it an even more valuable resource.	No change is needed.
10 Social Inclusion & Quality of Life	✓	Improving the seafront will contribute to making Portsmouth a safe, comfortable and friendly place where people want to live, work and visit. Furthermore, improving the area of the city that most residents are already proud of, as well as promoting events (particularly where they are free to all) will help give people a sense of belonging in the city.	No change is needed.

PCS9 Housing Delivery

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	(✓)	All housing sites within the city will be located on brownfield land (with only a handful of possible exceptions). This reduces pressure on greenfield areas and contributes toward regeneration of disused buildings and formally contaminated land. The density of housing development is likely to be high given the densely urban character of Portsmouth. This will ensure land is used appropriately across the city. Housing development may, however, increase the pressure on water resources in the city and increase the amount of domestic waste generated.	Any new housing development in the city will need to be supported by appropriate levels of infrastructure so that adequate sewerage and water provision are available. New infrastructure requirements and how they will be delivered are outlined in the Infrastructure Delivery Plan. Measures to ensure use of natural resources is minimised, both in housing construction and whilst in use, are outlined in the Sustainable Design and Construction policy.
2 Flood Risk	x	The majority of the strategic housing sites are located within flood risk areas. Furthermore, large scale development on the western side of the city will increase pressure on the western interceptor which is already at capacity.	Building new housing in flood risk areas is unavoidable in Portsmouth if the city wants to try and meet the housing need of existing and future residents, whilst supporting economic growth. The core strategy includes policies on flood risk and sustainable design and construction which seek to mitigate the potential impacts of flooding, both in terms of tidal inundation and surface water retention.
3 Biodiversity	(x)	Significant levels of housing delivery are expected to come forward on strategic sites located in close proximity to designated sites of nature conservation. It is also recognised that recreational disturbance can arise some distance from development sites. Whilst no green space should be lost by new development, the amount and quality of additional green spaces resulting from housing development will vary on a site-by-site basis.	No change is needed. Policy relating to development at the strategic sites will ensure mitigation to avoid disturbance and other adverse impacts. Furthermore, the designated sites are protected by law in the European Habitats Regulations and by the A Greener Portsmouth policy. A Habitats Regulation Assessment is also being conducted on the core strategy to ensure the nature conservation interests of the designated sites are not compromised by development.
4 Landscape & Townscape Quality	(✓)	Regenerating the strategic sites of Tipner and Horsea Island will help to improve the landscape quality of important gateways into the city. New housing will also primarily be on brownfield sites which could help to improve the quality and appearance of many other parts of the city.	No change is needed, although the quality of the housing delivered will be reliant on the Design and Conservation policy as well as those for the individual strategic sites to ensure the best quality of townscape is delivered.
5 Heritage	?	There may be an impact if new housing is built near heritage assets or within conservation areas.	No change is needed given protection of any heritage assets on strategic sites will be covered within these dedicated policies. When housing comes forward on a site-by-site basis, the design and conservation policy will ensure best possible care is taken when developing in proximity to heritage assets or within conservation areas.

6 Homes for Everyone	(✓)	This policy will make a positive contribution toward meeting the need for new homes in the city. However, it is considered impossible to meet overall long term need over the course of the plan period given the limits on urban capacity in Portsmouth. Increasing the number of homes in the city will also make more affordable homes available through implementation of the housing mix, size and provision of affordable homes policy.	No change. Whilst there is an estimated need for housing in the city of just under 19,000 new homes during the plan period, the urban capacity in Portsmouth is some 13,000 homes. The council has set a housing target that aims to balance the need for more family homes and larger sized dwellings with the need to maintain an attractive environment.
7 Education, Employment & Economy	(✓)	New housing will need to be delivered in the city to support economic growth. Other policies will contribute to growth in the economy, but new businesses may be discouraged from investing in Portsmouth without new housing.	No change. Although there is no direct impact, this policy will need to deliver new housing in support of other policies of the core strategy.
8 Health & Wellbeing	(✓)	If more homes are delivered in the city, this will increase the opportunity for people to own their own house or flat. This could help to improve quality of life and perceptions of health.	No change needed.
9 Culture, Leisure & Recreation	∅	This policy has no direct impact on this objective.	No change needed.
10 Social Inclusion & Quality of Life	(✓)	If new housing is delivered in town or district centres, or in the city centre, this will contribute to the vitality and viability of these areas. Furthermore, it will ensure these areas continue to be populated after normal shopping hours which can keep town centres populated into the early evening. This can introduce passive surveillance which can help reduce crime and the fear of crime. New housing will also increase opportunities for people to own their own home which may help to reduce social disadvantage.	No change needed.

### PCS10 Employment Land

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	?	The areas of the city outlined in the policy for the provision of employment land are all brownfield sites (contaminated land, vacant buildings or disused areas). This will help bring these parts of the city back into use whilst reducing development pressure on greenfield sites in and around the city. New employment could have a negative impact on air quality depending on the nature of the employment use and the level of traffic generated. This will depend on site-by-site applications, however, and will not be the same at each employment site.	The score is uncertain given it is not known what type of employment use will come forward on each site. Furthermore, policies elsewhere in the core strategy, such as sustainable design and construction, will mitigate many of the possible adverse impacts. It should also be acknowledged that waste management facilities can also come forward on industrial estates which would contribute toward waste disposal, avoiding waste, re-use and recycling. Further details will be outlined in the Hampshire

			Minerals and Waste Plan.
2 Flood Risk	x	Some new employment land will have to come forward within flood risk areas because of the existing dense urban character of the city. If Portsmouth is to keep growing as a city it will need to make the most of all available land. If new development is brought forward in the identified areas this will also put an increased strain on infrastructure such as the sewerage system, and may increase the risk of flooding from surface water retention.	Despite the negative score, no change is needed to the policy. Developing in flood risk areas is unavoidable in Portsmouth if the city is to grow and develop. Measures are in place to reduce and manage flood risk as set out in the flood risk policy or site-specific policies. The land chosen for employment land is the most appropriate in the city, and policies such as the Sustainable Design and Construction policy will help mitigate negative impacts. Furthermore, new infrastructure need in relation to sewerage capacity is outlined in the Infrastructure Delivery Plan.
3 Biodiversity	?	Some of the proposed employment land is located in proximity to designated sites of nature conservation. Furthermore, land at the commercial port and naval dockyard is also protected in the policy. Any intensification of uses in these areas will have a direct impact on the Portsmouth Harbour SPA/RAMSAR/SSSI.	Although the score is uncertain, this is because it is not yet clear what type of employment use will come forward, nor in which identified areas. A Habitats Regulation Assessment is also being conducted on the core strategy to ensure the nature conservation interests of the designated sites are not compromised by development. This will ensure the designated sites will not be adversely effected by the development of employment land in their vicinity.
4 Landscape & Townscape Quality	?	Developing new employment land may improve the quality and appearance of the built environment around the city. For example, further development in the city centre will improve the overall appearance of the main shopping area of the city, whilst regeneration at Tipner may create an impressive gateway into the city. However, this will depend on the type of employment use coming forward in each area.	The uncertainty is a result of not knowing yet what type of employment use will come forward and what style of building will be delivered. Although the city centre will be developed for retail and leisure uses, the final design of city centre north is not finalised. Furthermore, more industrial uses are less likely to be in architecturally interesting buildings. However, the Design and Conservation policy will ensure buildings are of the best quality and appropriate to their surroundings.
5 Heritage	?	There may be an impact if new employment is developed in proximity to heritage assets or within conservation areas. There are also a number of historic buildings in proximity to the naval dockyard which could be affected by new uses in this area.	Employment land in this policy covers several areas that may include heritage assets, although this will not become apparent until applications are made in accordance with the policy. When this happens, the Design and Conservation Policy and PPS5: Planning for the Historic Environment will ensure heritage in the city is protected.
6 Homes for Everyone	∅	There is no direct impact on this sustainability objective.	No change is needed.

7 Education, Employment & Economy	✓	The promotion of employment land in the policy will help to increase levels of employment in the city by providing the opportunity for the development of new jobs. This may also attract new businesses to the city which will stimulate economic growth in the city and may support existing businesses. New employment in the city may also improve access to training in the city enabling development of new skills. More growth and employment in the city may also attract more visitors to the city's tourist attractions.	No change is needed.
8 Health & Wellbeing	∅	Whilst there is no direct impact, it should be noted that new jobs in the city may help more people into employment and consequently improve perceptions of health.	No change needed. The amount of new people employed depends on the type of employment delivered in these areas.
9 Culture, Leisure & Recreation	∅	New cultural and employment facilities may be delivered in the city centre if the city centre north scheme goes ahead. However, this will depend on the detailed plans for the scheme which are not yet known.	No change needed.
10 Social Inclusion & Quality of Life	✓	New employment within the existing city centre and town and district centre will help to maintain their role locally and ensure their continued vitality and viability. This will ensure residents have continued access to local shops and services in the city. Furthermore, the possible increase in the amount of available jobs may help some into employment and reduce social disadvantage in some areas of the city.	No change needed.

### PCS11 Flood Risk

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	(✓)	The policy ensures that measures are taken to avoid flood risk in new development. If flooding is avoided, this will ensure water quality is maintained and does not become contaminated as a result of a flood event.	No change is needed to the policy.
2 Flood Risk	✓	Development in flood risk areas is unavoidable in Portsmouth given the dense urban character of the city and lack of extensive urban capacity for expansion and growth. Therefore this policy is very important and needs to address all issues of flood risk. The policy will ensure all development allocations are assessed and that those at a lower risk from flooding are developed first. It will ensure the city's flood defences are maintained and improved where possible and seek contributions towards this from new development. No development permitted until necessary surface water drainage or sewerage capacity is available. This will ensure flood risk is	No change is needed. This policy will also be supported by the Sustainable Design and Construction policy.

		managed on site and that impact on the sewerage system is minimised.	
3 Biodiversity	x	This policy ensures the city's coastal flood defences are maintained and enhanced. Adding to or creating new sea walls will result in coastal squeeze which may adversely impact designated sites of nature conservation or other areas of biodiversity importance.	Coastal defences need to be maintained or enhanced to protect life and property in at risk areas. Although this can result in coastal squeeze through the loss of intertidal zones, some losses are considered acceptable as Imperative Reasons of Overriding Public Interest in order to protect life and property. This is set out in the draft Appropriate Assessment for the core strategy. Therefore, although a negative impact is identified, no change is needed to the policy.
4 Landscape & Townscape Quality	∅	The policy has no direct impact on this objective.	No change needed.
5 Heritage	(✓)	Several heritage assets are located within flood zones, whilst a number of conservation areas are also completely or partially within flood risk areas. Therefore, protecting and enhancing sea defences to prevent flooding will ensure heritage assets are not damaged by a flood event.	No change is needed, although it should be noted that flood defences are not guaranteed to protect against an extreme flood event.
6 Homes for Everyone	(✓)	The flood risk policy will enable new homes to come forward on sites that would otherwise be undevelopable because of an unacceptable risk of flooding.	No change is needed. The policy is likely to have a positive impact but this will depend on the implementation of other policies such as housing delivery and those relating to the strategic sites.
7 Education, Employment & Economy	(✓)	The flood risk policy will enable new employment land to come forward on sites that would otherwise be undevelopable because of an unacceptable risk of flooding.	No change is needed. The policy is likely to have a positive impact but this will depend on the implementation of other policies such as housing delivery and those relating to the strategic sites.
8 Health & Wellbeing	(✓)	Ensuring that flood defences are protected and maintained may lessen the fear of flooding for local residents. This may have a positive benefit on health issues such as levels of stress.	No change needed to the policy since the only identifiable impact of the policy on this objective is potentially a positive one.
9 Culture, Leisure & Recreation	∅	There is no direct impact on this sustainability objective.	No change needed.
10 Social Inclusion & Quality of Life	∅	There is no direct impact on this sustainability objective.	No change needed.

## PCS12 A Greener Portsmouth

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	✓	This policy contributes to a number of the assessment criteria for this objective. It outlines measures to protect, enhance and increase provision of green infrastructure assets in the city which will have a positive effect on air quality in the city. The policy promotes development on brownfield sites by protecting against the loss of the city's open spaces, and encourages improved linkages to the city's green grid which could reduce the need to travel by car to these sites. Green roofs and walls are encouraged in new development which will help to manage surface water run off and therefore reduce the risk of pollution. There is also evidence that green spaces can help reduce the urban heat island effect thereby helping to mitigate the effects of climate change.	No change needed.
2 Flood Risk	(✓)	Protecting and, where possible, increasing the provision of green infrastructure in the city will help reduce the impact of surface water run-off and standing water following rainfall.	No change needed. The impact on this objective may vary on a site-by-site basis depending on the size of development and the levels of planting undertaken.
3 Biodiversity	✓	The policy will protect and enhance the condition of the city's international, national and locally designated nature conservation sites. Wildlife sites that are not designated will be safeguarded given the policy resists development on open space and makes provision to enhance these spaces where possible. Any new green spaces delivered as a result of the policy may also contribute to supporting wildlife in the city.	No change is needed.
4 Landscape & Townscape Quality	✓	Protecting and enhancing the green grid in Portsmouth will improve the quality and appearance of the built environment and help to foster positive perceptions of the city. Contributions will be sought from developers in order to improve the quality and quantity of green spaces.	The core strategy is not the appropriate document to outline which particular sites need enhancement and how this will be done. The city council's Parks and Open Spaces strategy will include further details.
5 Heritage	✓	Green spaces surrounding heritage assets will be protected, thereby contributing to the setting of historic buildings and scheduled ancient monuments. The city's historic parks and gardens are also protected and will be eligible for enhancement under the policy.	No change needed.

6 Homes for Everyone	(✓)	Landscape improvements and the provision of pocket parks on larger development sites will help to improve the overall quality of homes in the city. Furthermore, the policy will ensure that financial contributions are obtained from new housing development which will help improve the quality and multifunctionality of green spaces in the city. Private amenity space will also be required from new build residential development which may also contribute to green infrastructure in the city.	No change needed. The levels of green infrastructure required as a result of new landscaping will vary on a site-by-site basis.
7 Education, Employment & Economy	(✓)	Protecting and enhancing Portsmouth's green infrastructure assets will help to enhance the appeal of visitor attractions. This is especially true for the parks and gardens in the city. A greener city can also help improve the attractiveness of the cityscape to attract new businesses, thereby supporting economic growth.	No change needed.
8 Health & Wellbeing	✓	Protecting and enhancing green spaces whilst making them as multifunctional as possible will encourage people to use them for sports, leisure and healthy pursuits. The policy will improve many people's accessibility to a green space where they can partake in exercise or just enjoy a walk away from the built up areas of the city. This can help to increase perceptions of physical and mental health. It may also help to reduce health inequalities across the city. Furthermore, financial contributions may lead to enhancements within the green grid to reduce the fear of crime in some of these areas.	No change needed. This policy will also be supported by the Healthy City policy.
9 Culture, Leisure & Recreation	✓	The policy will protect parks and gardens, enhance them where possible and improve accessibility across the city. It will also ensure the highest play value of green sites are achieved which will improve access to high quality play areas for children.	No change needed.
10 Social Inclusion & Quality of Life	✓	The policy will help to ensure all residents have equal access to parks, gardens and green spaces, thereby helping to reduce social disadvantage or discrimination within the city.	No change needed.

### PCS13 A Healthy City

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources &		Air quality in the city will be enhanced by the provision of more green spaces and green planting. Access to public transport and healthy lifestyle choices,	No change is needed.

Climate Change	✓	such as walking and cycling, are encouraged which may reduce car use in the city, reducing natural resource depletion and having a positive impact on air quality.	
2 Flood Risk	(✓)	Increasing the provision of open space in the city will help reduce the impact of run-off and standing water following rainfall.	No change is needed. It should be noted this impact will also be dependent on implementation of the Flood Risk policy and the Greener Portsmouth policy.
3 Biodiversity	∅	The policy will contribute toward the goals of the Greening the City policy, which has a positive impact on biodiversity. However, it does not have a significant direct impact on this objective.	No change is needed.
4 Landscape & Townscape Quality	∅	The policy will contribute toward the goals of the Greening the City policy and thereby help to improve the attractiveness of the built environment. However, it does not have a significant direct impact on this objective.	No change needed.
5 Heritage	∅	The policy does not have a significant direct impact on this objective.	No change needed.
6 Homes for Everyone	∅	The policy does not have a significant direct impact on this objective	No change needed.
7 Education, Employment & Economy	∅	The policy does not have a significant direct impact on this objective.	No change needed.
8 Health & Wellbeing	✓	Provisions in the policy to improve opportunities for sports, leisure and recreation will increase opportunities for healthy pursuits and should help some people improve both their health and their perceptions of their health. The policy will also improve access to, and the distribution of, healthcare facilities in the city as well as the provision of new healthcare facilities. This will help to reduce health inequalities.	No change needed.
9 Culture, Leisure & Recreation	(✓)	The policy will contribute toward the goals of the greener city policy through the provision of open space, play, recreation and leisure facilities.	No change.

10 Social Inclusion & Quality of Life	✓	Improving access to health services and facilities across the whole city will help to reduce social disadvantage in certain areas.	No change.
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### PCS14 Sustainable Design and Construction

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	✓	This policy requires all development in Portsmouth to contribute to addressing climate change. Residential development will need to meet Code for Sustainable Homes standards whilst non-domestic development will need to meet the Very Good BREEAM standard. This will reduce the reliance on fossil fuels through the lifetime of new developments and help to lower water consumption levels. The policy also requires the use of recycled construction material during development where possible which will reduce the demand for supplies of aggregate.	No change needed.
2 Flood Risk	✓	The policy seeks to reduce water consumption in both domestic and non-domestic development. This should help to reduce the impact of new development on the city's sewerage system. The code for sustainable homes standards may also result in the use of sustainable drainage systems to manage flood risk from surface water in new development.	No change needed. Although it should be noted that the use of sustainable drainage system is not a mandatory requirement within the code.
3 Biodiversity	∅	There is no direct impact on this sustainability objective.	No change is needed. This policy has changed since the 2008 preferred options stage. Following an appraisal of the policies in that document, it was decided to have a separate Green Infrastructure policy. As a result, some of the objectives contained in the Sustainable Development policy in 2008 are now included as part of the A Greener Portsmouth policy.
4 Landscape & Townscape Quality	?	The policy is seeking to create development that is environmentally friendly and sustainable in the long-term. This could help to foster positive perceptions of the city's attractiveness. However, buildings designed to be energy efficient or incorporating renewable energy could look incongruous in the wider street scene. It may also be difficult to retrofit or convert existing buildings in an aesthetically pleasing fashion.	No change is needed as the overriding imperative of the core strategy is sustainable development. This is especially important in Portsmouth as the city is likely to be seriously effected by climate change, especially if no mitigation measures are taken. The Design and Conservation policy will also seek to ensure the highest standards of architectural quality in all new development.
5 Heritage		All conversions of existing buildings will need to comply with this policy. It is uncertain how energy efficiency measures would impact on the historic	No change needed. It would not be desirable to alter the policy in relation to historic buildings. Balancing the need

	?	environment, and it is likely that some buildings will be more suitable for conversion than others.	to increase the sustainability of buildings with preserving their historic character will have to be done on a case by case basis. The Design and Conservation policy will also seek to ensure the highest standards of architectural quality in all new development.
6 Homes for Everyone	✓	This policy will contribute to the delivery of good quality homes that will stand the test of time. Housing will also be of the highest energy efficiency standards making them cheaper to run. Increased construction costs as a result of the high standards set in the policy were of concern. However, the report "Assessing the implications of Portsmouth City Council's draft policy for higher sustainability standards in new developments" concluded the standards included in this policy are viable.	No change needed. Housing supply is not considered to be affected by this policy, and it is desirable to ensure highest standards of sustainability in new development.
7 Education, Employment & Economy	?	The extra development costs under the policy could prevent some smaller employment sites or sites within town centres from coming forward. However, energy efficient buildings will be cheaper to run and more desirable to occupiers. The increased requirements could help develop the sustainable construction economy.	No change needed. Overall it is not considered that supply will be affected significantly by this policy, and it is desirable to ensure highest standards of sustainability in new development
8 Health & Wellbeing	(✓)	This policy should have a positive impact on health. The use of greener and energy efficient technology could improve perceptions of health, as could positive construction methods such as utilising natural light in building design. Overall health should also improve as a result of fewer emissions from new development.	No change needed.
9 Culture, Leisure & Recreation	∅	There is no direct impact on this sustainability objective.	No change needed.
10 Social Inclusion & Quality of Life	∅	There is no direct impact on this sustainability objective.	No change needed.
<b>PCS15 Infrastructure and Community Benefit</b>			
<b>Sustainability Objectives</b>	<b>Contribution to SA objective</b>	<b>Reason for Score</b>	<b>Change needed?</b>
1 Natural Resources & Climate	∅	There is no direct impact on this sustainability objective.	No change needed.

Change			
2 Flood Risk	✓	The policy will ensure new infrastructure is provided in order to meet planned development. This will include increasing the capacity of the sewerage system which is vital to the development of strategic sites on the west of the city.	No change needed.
3 Biodiversity	∅	There is no direct impact on this sustainability objective, although it will act as an enabling policy to development which may increase pressure on wildlife sites.	No change is needed. Although new development will be delivered as a result of this policy, mitigation of adverse impacts on designated sites of nature conservation is covered by other policies in the core strategy.
4 Landscape & Townscape Quality	(✓)	This policy will need to be implemented in order to bring forward the strategic sites in the city including Tipner and Horsea Island and Port Solent. This will contribute to the regeneration of these areas which would improve the quality of both landscape and townscape in some prominent areas of the city.	No change is needed.
5 Heritage	∅	There is no direct impact on this sustainability objective.	No change needed.
6 Homes for Everyone	(✓)	The number of houses deliverable at strategic sites in the city would be significantly lower without the infrastructure that this policy (together with the Infrastructure Delivery Plan) will help to deliver. This policy will therefore support the delivery of more homes in the city.	No change needed.
7 Education, Employment & Economy	(✓)	The amount of employment land deliverable at strategic sites in the city would be significantly lower without the infrastructure that this policy (together with the Infrastructure Delivery Plan) will help to deliver. This policy will therefore support the delivery of employment land in the city which should help to increase the number of available jobs.	No change needed.
8 Health & Wellbeing	∅	There is no direct impact on this sustainability objective.	No change needed.
9 Culture, Leisure & Recreation	∅	There is no direct impact on this sustainability objective.	No change needed.

10 Social Inclusion & Quality of Life	(✓)	This policy will help to bring forward development providing new housing and jobs. This will help to support the vitality and viability of the city's town and local centres, ensure access to shops and services and help to reduce concentrations of social disadvantage in certain parts of the city.	No change needed.
<b>PCS16 Transport</b>			
<b>Sustainability Objectives</b>	<b>Contribution to SA objective</b>	<b>Reason for Score</b>	<b>Change needed?</b>
1 Natural Resources & Climate Change	✓	The policy seeks to improve access to and improvement of public transport in the city. This should help to minimise the need to travel by private transport. This could also reduce the amount of fossil fuels consumed by transport use and also help to improve air quality.	No change is needed.
2 Flood Risk	∅	There is no direct impact.	No change needed.
3 Biodiversity	?	The proposed bridge link between Tipner and Port Solent will have an impact on Portsmouth Harbour SPA/RAMSAR/SSSI. However, the detail of the bridge, including its exact design, location and alignment, will be signposted down from the core strategy to a lower tier of plan making. The draft Appropriate Assessment report for the core strategy regulation 25 consultation recommends undertaking a detailed HRA for any lower-tier planning application for the bridge link. As a result, the impact of the policy on this sustainability objective is currently uncertain.  Improving public transport links across the city may also make it easier to access designated sites for recreational purposes.	No change is needed. As noted, a detailed consideration of the impacts of the bridge link will be made during a HRA of a lower-tier planning application. Furthermore, the A Greener Portsmouth policy contains measures to protect designated sites from harm as well as maintaining and enhancing provision of green infrastructure to reduce recreational pressure of development on the designated sites.
4 Landscape & Townscape Quality	(✓)	It is likely the new public transport interchanges outlined in the policy will improve the quality of the landscape and townscape in the city.	No change is needed.
5 Heritage	∅	There is no direct impact on this sustainability objective.	No change needed.

6 Homes for Everyone	∅	There is no direct impact on this sustainability objective.	No change needed.
7 Education, Employment & Economy	✓	Business and economic growth in the city will be supported by improvements to transport infrastructure in the city, including walking, cycling and public transport. Highway improvements will also help to bring forward the strategic sites thereby enabling further growth and development in the city. It will also make it easier for people to visit the city's visitor attractions.	No change needed.
8 Health & Wellbeing	✓	Improvements to transport infrastructure will make it easier for people to access, leisure centres, multifunctional green space and healthcare facilities. This will give people a wider choice of accessible healthy pursuits as well as making it easier for people to visit healthcare facilities. Well designed transport interchanges and new road layouts may also reduce accidents on the road.	No change needed.
9 Culture, Leisure & Recreation	✓	Transport improvements will make it easier for people to access green spaces across the city as well as cultural and entertainment facilities.	No change needed.
10 Social Inclusion & Quality of Life	✓	This policy will help to improve access to the city centre as well as town and district centres across the city. This will contribute to the continued vitality and viability of these centres and ensure as many people as possible have good access to shops and services. If public transport links are improved in some areas of the city (development of a new station at Paulsgrove, for example), this may help reduce social disadvantage.	No change needed.

### PCS17 Local Shops and Services

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	(✓)	Protecting and enhancing local shops and services could reduce the need to travel for those looking to purchase essential goods and services.	No change needed.
2 Flood Risk		Although some residential uses may be delivered at first floor level in local	No change needed.

	∅	centres, this policy will have no direct impact on this objective.	
3 Biodiversity	∅	There is no direct impact on this sustainability objective.	No change is needed.
4 Landscape & Townscape Quality	✓	This policy will contribute toward the survival and prosperity of the city's local centres. Their continued development can help to foster positive perceptions of the city and help to improve the quality of the built environment.	No change is needed.
5 Heritage	∅	Some local centres could be considered part of the local heritage of the area and this policy would help to support them. However, there is no direct impact on heritage from this policy.	No change needed.
6 Homes for Everyone	∅	There is no direct impact on this sustainability objective. Although some C3 uses may come forward at first floor level in local centres, this is only likely to be in small numbers and is unlikely to make a significant contribution to this sustainability objective.	No change needed.
7 Education, Employment & Economy	✓	Protecting and enhancing local shopping centres will have a positive impact by supporting local jobs. It may also create new jobs or encourage more start-up businesses in these areas if local centres are seen to be thriving. Flourishing local centres in close proximity to tourist attractions will also help to support the visitor economy.	No change needed.
8 Health & Wellbeing	(✓)	Thriving local centres will be less susceptible to crime and anti-social behaviour. The policy will also protect nearby residents from uses which could have an adverse impact on local amenity if allowed to accumulate in one area.	No change needed.
9 Culture, Leisure & Recreation	(✓)	Culture and entertainment facilities within local centres will be supported by this policy. These uses are more likely to stay in a local centre if it is successful.	No change needed.
10 Social Inclusion &		This policy provides support to town and local centres and will therefore help to ensure their continued vitality and viability. Ensuring they remain	No change needed.

Quality of Life	✓	successful and available to local people will ensure continued good access to shops and services across the city. Any new jobs provided in local centres could also help to reduce social disadvantage in some parts of the city.	
PCS18 Housing Mix, Size and the Provision of Affordable Homes			
Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	∅	This policy has no significant impact on this objective.	No change needed. The housing density policy will ensure new housing in the city is built to appropriate density levels.
2 Flood Risk	∅	This policy has no significant impact on this objective.	No change needed.
3 Biodiversity	∅	This policy has no significant impact on this objective.	No change needed.
4 Landscape & Townscape Quality	?	A range of housing styles may be built under this policy given it encourages a mix of dwelling size and tenure. Varied housing designs may range in quality with some enhancing the attractiveness of the city whilst others are more functional.	No change needed. Whilst further housing development will have an impact on the existing built environment, other policies such as Design and Conservation and Sustainable Design and Construction will control the impact of development. The A Greener Portsmouth policy will also ensure sufficient green space is provided by new housing development.
5 Heritage	∅	This policy has no significant impact on this objective.	No change needed. Any construction within conservation areas will be controlled through the Design and Conservation policy and PPS5.
6 Homes for Everyone	✓	The policy sets a target of 40% family housing where appropriate. This will increase the amount of larger properties in the city suitable for families and provide more choice in the type of available accommodation. Introducing space standards will result in larger average dwelling sizes that are fit for purpose and of higher quality. The affordable housing requirements will deliver lower cost housing where it is needed, increasing choice and availability of housing stock. The mix of good sized family and affordable units across the city will contribute to the creation of mixed communities and neighbourhoods.	No change is needed.

7 Education, Employment & Economy	∅	The provision of larger family units may attract wealthy business/executive families to the city. However, the likelihood of this is uncertain and the possible benefits are undefined. Therefore it is considered there is no direct impact of the policy on this objective.	No change needed.
8 Health & Wellbeing	✓	Larger living spaces can have a positive impact on health and wellbeing giving people more access to private space and children more room to play. This can improve family life at home and have benefits for both lifestyle and social factors in terms of the determinants of health. Delivering more affordable housing in appropriate areas can also reduce stress levels for people who are struggling to find a home within their price range in an area where they want to live.	No change needed. The health city policy outlines how development in the city can help contribute to health and wellbeing.
9 Culture, Leisure & Recreation	∅	This policy has no significant impact on this objective.	No change needed.
10 Social Inclusion & Quality of Life	✓	The policy ensures that better quality homes will be delivered resulting in a greater sense of pride of place. More affordable housing and a greater mix of dwelling tenure and type across the city will help to reduce concentrations of disadvantage and discrimination.	No change needed.

### PCS19 Houses in Multiple Occupation

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	∅	The policy relates to applications for changes of use and does not involve new development. Therefore it is not considered that there would be an impact on natural resources and climate change.	No change is needed.
2 Flood Risk	∅	The policy relates to applications for changes of use and does not involve new development. Therefore it is not considered that there would be an impact on flood risk.	No change is needed.
3 Biodiversity	∅	The policy relates to applications for changes of use and does not involve new development. Therefore it is not considered that there would be an impact on biodiversity.	No change is needed.

4 Landscape & Townscape Quality	(✓)	HMOs have been linked to poor quality local environments such as poorly kept frontages and pressure on services such as refuse disposal, street cleaning and parking. Controlling future concentrations of HMOs in the city may therefore have a positive impact on the townscape of some areas. In particular on the quality/appearance of the built environment and on perceptions of the city's attractiveness.	No change is needed to the policy.
5 Heritage	(✓)	Linked to the issue of Landscape and Townscape quality, controlling future concentrations of HMOs in the city may have a positive impact on the maintenance and protection of Conservation Areas and on the setting of listed buildings.	No change needed.
6 Homes for Everyone	?	Controlling changes of use between class C3 (dwelling houses) and Class C4/other types of HMOs in sui generis use will help to ensure that family housing is available and to ensure a mix and balance of housing types at the neighbourhood level. It may also, however, have a negative impact on the availability of affordable housing options for those on lower incomes. The overall nature of the policy's impact on this sustainability issue is therefore unclear at this stage.	No change.
7 Education, Employment & Economy	✗	It is recognised that HMOs often meet the housing needs of students and young professionals. Restricting the number of HMOs in the city may make Portsmouth less attractive as a place to study and seek employment and may impact negatively on the availability of skilled workers.	No change.
8 Health & Wellbeing	(✓)	High concentrations of HMOs have been linked to increased levels of crime and burglary (associated with transient populations living in relatively insecure accommodation) and increased levels of anti-social behaviour. By promoting mixed and balanced communities through the control of future concentrations of HMOs in the city, the policy may have a positive impact on fear of crime and levels of crime and anti-social behaviour in some parts of the city.	No change needed.
9 Culture, Leisure & Recreation	(✓)	It has been recognised that local services and facilities (such as entertainment facilities) often seek to respond to new populations such as those younger populations that tend to characterise areas with high concentrations of HMOs. By promoting more mixed and balanced communities, the policy may have a positive impact on the availability of facilities that satisfy a range of residents' expectations.	No change.
10 Social Inclusion & Quality of Life		As with the issue of Culture, Leisure and Recreation, the promotion of mixed and balanced communities by this policy may have a positive impact on existing towns and local centres. It may also reduce the concentration of	No change.

	(✓)	social disadvantage (associated with low income) in certain areas of the city.	
PCS20 Housing Density			
Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	(✓)	Areas identified for high density housing development are close to local facilities and have very good public transport links. This will reduce the need for residents to travel for their essential goods and services, and possibly reduce car ownership. Development will also take place on brownfield land, vacant sites or disused buildings, thereby protecting existing areas of open space. However, intensifying development in areas close to transport corridors could increase the number of people living in areas of poor air quality. Any large scale development on the western side of the city would also increase pressure on the sewer system which is already at capacity.	No change is needed. Any impact from physical development will be mitigated by the Sustainable Design and Construction policy as well as national policy on sustainable development. Infrastructure requirements on strategic sites will also require sufficient sewerage and drainage capacity. Air quality will be monitored by the environment and public protection service and any mitigation agreed at the design stage of the developments and by future air quality management plans.
2 Flood Risk	x	Several of the areas identified for intensification are in flood risk areas. This is especially true for the strategic sites of Tipner, Horsea and Port Solent. Furthermore, further large scale development on the western side of the city will increase pressure on the sewer system which is already at capacity.	Sustainability considerations elsewhere in the city indicate the density policy is necessary and does not need to change. Mitigation at strategic sites includes measures to reduce or limit flood risk and the provision of flood defences. Furthermore, the Flood Risk policy requires sufficient sewerage and drainage capacity for all new developments. The infrastructure delivery plan will outline how sewerage capacity in the city will be managed in the future. Every effort will be taken to minimise and protect against flood risk, however, the densely built up nature of the city means building in flood risk zones is necessary to maintain growth.
3 Biodiversity	(x)	The majority of the areas identified for high density housing development are not located near designated nature conservation sites. Developing on these brownfield sites also relieves development pressure on the city's existing non-designated green spaces that support wildlife. However, Tipner, Horsea Island and Port Solent are in close proximity to Portsmouth Harbour and could have an adverse impact on local wildlife in terms of increased disturbance from development at the harbour's edge. It is also recognised that recreational disturbance can arise some distance from development sites.	No change is needed. Policy relating to development at the strategic sites will ensure mitigation to avoid disturbance and other adverse impacts. Furthermore, the designated sites are protected by law in the European Habitats Regulations and by the A Greener Portsmouth policy. A Habitats Regulation Assessment is also being conducted on the core strategy to ensure the nature conservation interests of the designated sites are not compromised by development.

4 Landscape & Townscape Quality	?	It is clear that higher density development will have an impact on the townscape of those areas in the policy. High density development can result in good design and innovation in building techniques which would result in an improvement to the built environment. However, some may feel that high density of any kind is undesirable in the city.	No change is needed to the policy. The policies relating to the strategic sites will ensure that development is done to the highest standards. Furthermore, the Core Strategy Design and Conservation policy will require excellent architectural quality in new development. Both the design and density policies will ensure that development is built to density levels appropriate to individual site constraints.
5 Heritage	∅	The policy acknowledges that appropriate housing density depends on a variety of factors, which includes nearby heritage assets. However, there is no clear direct impact of the policy on the city's heritage assets.	No change needed. The city's historic assets and their settings will be protected by the design and conservation policy in the core strategy as well as PPS5: Planning for the Historic Environment.
6 Homes for Everyone	✓	Developing at high densities in appropriate areas will enable more dwellings to be constructed and increase housing numbers. Together with the affordable housing policy, this should enable more people to enter the housing market. The policy also allows for lower densities outside of the strategic sites and town/local centres. This will help facilitate the development of larger family units where appropriate and help to achieve a good mix of housing throughout the city.	No change. High standards of design and minimum dwelling sizes required in other policies should ensure new housing will be sustainable.
7 Education, Employment & Economy	∅	The density policy has no significant direct impact on this objective.	No change.
8 Health & Wellbeing	∅	Higher densities may result in an increase in overlooking of public areas and therefore help to alleviate the fear of crime in some places. Furthermore, higher density developments will be close to local amenities and could improve some people's access to local services. City and town centre living could also encourage cycle use given facilities are within easy reach. However, these impacts are not a direct result of the density policy.	No change needed. The health city policy outlines how development in the city can help contribute to health and wellbeing.
9 Culture, Leisure & Recreation	∅	Higher densities may improve some people's access to cultural and entertainment facilities. However, this may not increase access to multi-functional green spaces and other green infrastructure assets given many of the sites identified for higher densities are not located in close proximity to these assets. Therefore, the policy has no significant direct impact on this objective.	The Design and Conservation and A Greener Portsmouth policies will further outline how development can help meet this objective.
10 Social Inclusion & Quality of Life	✓	An increase in population density in city/town/district and local centres will help to maintain vibrancy and vitality through the day and into the evening. It will also help to improve access to services for residents in new developments. The policy will also contribute towards the creation of mixed communities and therefore help to reduce concentrations of social disadvantage in some areas of the city.	No change.

## PCS21 Gypsy, Traveller and Travelling Showpeople Accommodation

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	∅	The policy has no significant impact on the objective.	No change needed.
2 Flood Risk	✓	The criteria of the selection of suitable sites states that they should not be located in flood zones 2 or 3. Therefore the policy will not result in any increase in flood risk.	No change needed.
3 Biodiversity	✓	Discouraging illegal encampments reduces the chances of settlements appearing on designated sites or other green open spaces in the city. Furthermore, the criteria in the policy do not allow camps to be established on existing open space or the designated sites for nature and wildlife conservation.	No change is needed.
4 Landscape & Townscape Quality	?	Providing designated sites will keep gypsy and traveller settlements in areas where they will not have an adverse impact on the built environment and townscape. However, given the densely built up character of the city, the sites will likely have some kind of impact. Despite the requirements of the policy, the impact will remain uncertain until the sites come forward.	No change needed.
5 Heritage	∅	There is no significant direct effect on this objective.	Although conservation areas are not listed in the criteria, they are unsuitable for camp sites given their built up character. Therefore no change is needed to the policy.
6 Homes for Everyone	?	Homes for this community will be provided if sites come forward. Given no assessment of the impact of the policy can be made until any sites are proposed, the overall objective is uncertain.	No change needed.
7 Education, Employment & Economy	∅	Given that most gypsies and travellers are unlikely to stay in one location for a long period of time, there is no direct impact on this objective. However, the policy does require sites to be in a reasonable proximity to local facilities, including schools, so that this community has good access to education & training.	No change needed.
8 Health & Wellbeing	(✓)	The policy requires sites to be within a reasonable proximity to local facilities, including medical services. Furthermore, the policy will reduce the likelihood of illegal encampments in the city and could result in a reduction in the fear of	No change needed.

		crime and anti-social behaviour.	
9 Culture, Leisure & Recreation	(✓)	The policy protects open spaces and areas of nature conservation in the city from gypsy and traveller sites. This will help ensure encampments do not compromise access to multi-functional green spaces or any part of the city's green grid.	No change needed.
10 Social Inclusion & Quality of Life	✓	The policy requires sites to be within reasonable proximity to local facilities, including shops and welfare services, ensuring equality of access to services.	No change needed.

### PCS22 Design and Conservation

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	∅	The design and conservation policy will ensure the best quality of design is delivered by development. Whilst excellent architectural quality might include sustainable construction methods, the policy has no direct link to the construction methods employed or ecological merit of materials used.	The sustainable design and construction policy will ensure all new development is built to the highest ecological standards including use of low-carbon technology and utilising recycled material in the construction phase. No change is needed to the policy.
2 Flood Risk	∅	This policy has no direct link to the flood risk objective.	No change is needed to the policy. City wide flood risk and mitigation of flooding on individual development sites is covered in the Flood Risk policy. Issues relating to sewerage capacity and new development is also covered here as in the infrastructure delivery plan.
3 Biodiversity	∅	This policy has no direct link to the biodiversity objective.	Issues relating to development and biodiversity are covered in the Greener Portsmouth policy.
4 Landscape & Townscape Quality	✓	The design and conservation policy will ensure all new development is of the highest architectural quality which will enhance the quality and appearance of the built environment across the city. This will also be achieved by seeking delight and innovation from new buildings, development that relates accordingly to its surroundings and the promotion of public art. Increasing the attractiveness of the city should also foster further positive perceptions of the city's attractiveness.	No change needed. The Greener Portsmouth policy will ensure sufficient open space is either provided on development sites, or that suitable contributions are received.
5 Heritage	✓	Development needs to preserve and enhance conservation areas and appropriately relate to the city's heritage assets. This will ensure heritage in the city is maintained and protected for future generations and contribute to the character and attractiveness of the Portsmouth.	No change is needed.

6 Homes for Everyone	(✓)	The policy will ensure that new housing delivered in the city in line with the spatial policy and housing mix and density policies will be of the best possible design quality, and provide flexibility for the best possible designs for different dwelling types. Although the policy does not have a direct impact it will ensure the quality of new housing.	No change needed. The policy supports the other housing policies in the core strategy.
7 Education, Employment & Economy	(✓)	The policy will protect and enhance the city's heritage assets which form an important part of the visitor economy. This will ensure these areas can continue to contribute to economic growth in the city.	No change needed.
8 Health & Wellbeing	(✓)	High quality and attractive buildings will be delivered through implementation of this policy. This may have a positive impact on how people feel about their living environment and therefore their own health. The requirements to consider designing out crime may also have positive benefits on reducing crime and the fear of crime. Uncertainty exists given that even good design is not always universally appreciated and therefore may not deliver the above benefits for everyone.	No change needed.
9 Culture, Leisure & Recreation	(✓)	Pleasant and attractive spaces in the city will be protected from unsuitable development that may otherwise obscure views or overshadow open areas. Public art will also be encouraged where possible to help create more attractive areas of public realm.	No change needed.
10 Social Inclusion & Quality of Life	(✓)	The policy will ensure active street frontages remain in town and local centres, ensuring their vitality and vibrancy is maintained at street level. Although the policy can have no direct impact on access to shops and services, the high quality design it will promote could help to foster a sense of pride in Portsmouth.	No change needed.

### PCS23 Tall Buildings

Sustainability Objectives	Contribution to SA objective	Reason for Score	Change needed?
1 Natural Resources & Climate Change	(✓)	The preferred location for tall buildings in the city are in areas which have (or will have with regards to strategic sites) good links to local shops and services, which could minimise the need to travel. The preferred locations are also all located on brownfield sites.	The sustainable design and construction policy will limit the environmental impact of tall buildings in the city by requiring compliance with code for sustainable homes or BREEAM standards. No change is needed to the policy.
2 Flood Risk	x	The majority of the preferred locations are within flood zone 2 and 3. Some are also located on the western side of the city where the sewer system is already at capacity.	Portsmouth's intensely urban and built up character means that further development in the flood zones is necessary in order to achieve growth. Therefore no change can be made to the policy. The Sustainable Design and Construction and Flood Risk policies will

			mitigate potential harm and ensure new development incorporates suitable measures to deal with surface water run off. The infrastructure delivery plan sets out how sewerage capacity will be increased in future to deal with demand.
3 Biodiversity	?	Some of the preferred locations for tall buildings are close to designated nature conservation sites such as Portsmouth Harbour. This could have an impact on wildlife and fauna at these sites. However, the Habitats Regulations exist to prevent new development from having an adverse impact on designated nature conservation sites. Therefore, whilst the Tall Buildings policy may have an impact on its own, the law exists to protect these sites.	The A Greener Portsmouth policy will protect biodiversity at designated wildlife sites and seeks to mitigate adverse impacts of residential disturbance. Furthermore, an Appropriate Assessment has been conducted which ensures/states – NEED SOME WORDS FROM DAVID.
4 Landscape & Townscape Quality	✓	The Tall Buildings policy and supporting SPD will ensure these developments occur in the most suitable locations and with the best possible design. Any new tall buildings will be of an architectural standard that will enhance the quality and appearance of the city's built environment and help to foster positive perceptions of the city's attractiveness.	No change needed. The supporting SPD and the Design and Conservation, Sustainable Design and Construction and A Greener Portsmouth policies will contribute to developing only the best quality of tall building in the city.
5 Heritage	?	Some of the preferred locations will likely have an impact on conservation and heritage if a tall building is developed.	No change is needed. The supporting SPD contains a number of design criteria that will ensure conservation areas, listed buildings and ancient monuments are respected by any new development. Furthermore, applicants would also need to comply with the Design and Conservation Policy.
6 Homes for Everyone	∅	The policy has no direct impact given it cannot control what type of use will be proposed in tall buildings applications in the preferred locations.	No change needed.
7 Education, Employment & Economy	∅	The policy seeks to ensure proposed development takes place in appropriate locations for tall buildings and is of a quality design. It does not have an impact on whether the building will be used for housing, education or employment and economy.	No change needed.
8 Health & Wellbeing	∅	The tall buildings policy does not have a direct relationship to this objective.	No change needed.
9 Culture, Leisure & Recreation	∅	The tall buildings policy does not have a direct relationship to this objective.	No change needed.
10 Social Inclusion &		The preferred sites are located within town and local centres. If tall buildings come forward in these areas, they will contribute to the vitality and viability of	No change needed.

Quality of Life	(✓)	the centres regardless of the use of the building. Their contribution to reducing concentrations of social disadvantage will depend on where applications come forward, however.	
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<b>✓ Positive effect</b>	<i>Where the policy is certain to have a positive impact on the sustainability objectives</i>
<b>(✓) Possible positive effect</b>	<i>Where the policy is likely to have a positive impact, but where there is some uncertainty</i>
<b>? Uncertain overall effect</b>	<i>Where the effect of the policy on the sustainability criterion is uncertain, or where there are both positive and negative effects, thereby making the overall effect uncertain</i>
<b>(✗) Possible negative effect</b>	<i>Where the policy is likely to have a negative impact, but where there is some uncertainty</i>
<b>* Negative effect</b>	<i>Where the policy is certain to have a negative impact on the sustainability criterion</i>
<b>∅ No direct relationship or no impact</b>	<i>Where there is no direct relationship between the policy and the criterion or the policy has only a very minor impact on the criterion</i>

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