

Portsmouth Local Plan The Future of Tipner and Horsea Consultation

Summary of Responses

July 2019

i. Abbreviations

BAP	Biodiversity Action Plan
BAR	Ben Ainslie Racing
DEFRA	Department of Environment, Food and Rural Affairs
HRA	Habitats Regulations Assessment
HIWWT	Hampshire & Isle of Wight Wildlife Trust
IROPI	Imperative Reasons of Overriding Public Interest
LEP	Local Enterprise Partnership
MoD	Ministry of Defence
MMO	Marine Management Organisation
NPPF	National Planning Policy Framework
PCC	Portsmouth City Council
PUSH	Partnership for Urban South Hampshire
RAPS	Residents Association of Port Solent
SSSI	Site Special Scientific Interest
SPA	Special Protection Area
SIFCA	Southern Inshore Fisheries and Conservation Authority
UXO	Unexploded Ordinates

i. Introduction

A consultation paper on the Tipner Strategic Development Area, including a new option to form a 'Super Peninsula' by reclaiming land from Portsmouth Harbour, was published for consultation from 11th February to 25th March 2019. A total of 344 comments were received from 165 respondents. This paper follows on from the previous the *Portsmouth Local Plan Issues and Options consultation document* (August 2017).¹

Land at Tipner and Horsea Island, the largest area of partly undeveloped land in the city, has been identified as a potential strategic location to help meet the City's current and long term housing and employment needs. The consultation document outlined out the Council's current thinking in relation to the options for this area and identifies where further evidence gathering work is required. Topics covered included the need the development (e.g. meeting housing needs), environmental issues, economic development, traffic and transport, flood risk, visual impact, viability and the possible mix of uses the site area(s) could provide. Respondents had the opportunity to comment on the information presented and make any other comments.

This report summarises the responses received. There is a chapter on each of the consultation questions as follows:

1. The Description of the Area
2. Main Issues and Challenges
3. The Proposed Vision for the Development Area
4. The Super Peninsula Concept
5. The Summary of Issues
6. The Proposed Strategy Plan
7. Further Work
8. Other Comments

This document focuses on the issues raised, and for that reason the respondents are not named. However, where the identity of the respondent is particularly relevant to the issue being discussed, the organisation is named in **bold**. A full list of respondents is set out in the appendix to this document and their full comments can be accessed from:

<https://www.portsmouth.gov.uk/ext/development-and-planning/planning/the-local-plan>

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

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

1. The Description of the Development Area

Question:	<i>Do you agree with the description of the area, the characteristics and the constraints? Have we missed anything? Would you describe anything differently?</i>
Topic outline	Gives an overview of the 'Tipner Strategic Development Area' including the need for the development and a description/ planning history of Tipner West, Tipner Firing Range, Horsea Island and the 'super peninsula' opinion
Number of responses:	50

A.	Employment, with supporting residential
B.	Marine Employment, including supporting residential
C.	Community Uses, including school and local retail
D.	Residential
E.	Residential
F.	Housing, Employment & Habitat Creation
	Proposed new road
	No through route for private vehicles
	Indicative potential land reclamation*
	Maximum extent of the area under consideration



Overall, 31 respondents generally agreed with the description of the site. 12 respondents had mixed feelings, with some concerns for certain information being left out or inaccurate and others were concerned that insufficient environmental consideration had been made. There were five respondents who were totally opposed to the description, largely based on concerns of overdevelopment. Two respondents made 'no comment' due to their unfamiliarity with the area.

Map of the Development Area: A few respondents were concerned that the widely drawn line boundary around the site is misleading and implied that land reclamation would make Portsea Island 'no longer an island'. This could be more clearly shown and better articulated.

Name for the Development Area:

- 'Tipner and Horsea Redevelopment' or 'Tipner and Horsea Super Peninsula'.
- Not sure it merits being a 'super' peninsular.

Existing Character of the Area: the "*largest area of undeveloped and underused land in the city*" (para. 1.1):

- Agree - an opportunity site for regeneration and new development.
- Disagree - suggest this description would better apply to the southern end of Eastern Road.
- 'Underdeveloped' is not a term that everyone is comfortable with and may be subjective.
- This description 'wilfully ignores' ecological significance of the area (**Butterfly Conservation Society**)
- The area should be described as one of the few remaining open, green areas left in the city.

The legacy of historical, industrial and military activities and the need for remediation should be included in the description of the site- including the former use of the site for 'wreckage' (scrapyard).

There is no reference to the area's historic significance or heritage assets (**Historic England**).

The Existing Environment:

- The ecological significance of the area, including official designations is understated. The description should highlight the environmental sensitivity of the site.
- The area should be referred to as a necessary wildlife corridor including its mudflats for geese, rare flounders (flatfish) of Portsmouth and Langstone Harbour and other wildlife (such as Kingfishers).
- Greater acknowledgement should be made for flooding and sea level changes due to climate change
- Include reference to Portsmouth Harbour as a Site of Special Scientific Interest (SSSI), as well as Special Protection Area (SPA) and Ramsar site (para. 3.5).

Existing uses:

- No reference to the two boat/ sailing clubs at Tipner West; the future of these facilities will need to be taken into account in the planning of the area.
- The description should better reflect that the school is a special school specifically for children with Social, Emotional and Mental Health (SEMH) needs. The school is located next to a lorry park and M275 slip road (**The Harbour School**).
- It should be acknowledged that the firing range is used by the public for target practice, not just the Ministry of Defence (MoD), and that these facilities would be lost.

The Need for the Development:

Some agree that the area presents a major opportunity to deliver housing for the city (3 comments) while others disagreed with the government's 'unrealistic' approach to housing numbers in constrained areas which forms a key part of the rationale for the development.

Description of the Tipner Development Area – Initial Council response:

Overall it is considered that the document does highlight the sensitive environmental and ecological assets on the site. Nonetheless the feedback given here highlights the need for the Council to take these factors into consideration. The presence of the two sailing clubs, the heritage assets on site and the Harbour school are all acknowledged and are important factors for the future of the site going forward.

2. Vision

Question:	<i>Do you agree with the proposed vision for the Tipner Strategic Development Area?</i>
Topic outline	<p>The 'vision' details what development in this location would be expected to achieve. It includes:</p> <ul style="list-style-type: none"> - A sustainable and cohesive new community - A wide range of housing types and tenures - A wide range of employment opportunities - Net gains in environmental benefits and biodiversity - A linked network of open spaces - Flood risk mitigation strategy that integrates visual enhancements and biodiversity improvements. - Effective phasing of development to deliver the necessary social and physical infrastructure as needed.
Number of responses:	55

There were 24 responses who supported the proposed vision. A number of which highlighted the potential delivery of much needed housing and/or the need to address the existing poor state of the area as a desirable outcome for redevelopment. A couple of respondents also supported the principle of building or increasing landmass in a well-connected area, as opposed to building on greenfield sites.

19 respondents were more mixed in their views, for example some were receptive to the vision for the area as long as environmental and transportation related concerns are able to be addressed, or if land reclamation wasn't included. There were 12 respondents who opposed to the vision for the area, chiefly citing sustainability and overdevelopment concerns; four of which felt the vision was poor or 'ill-conceived', lacked ambition and/ or creativity.

Vision for New Community and Development Area:

- The importance of maintaining the original scope of the vision throughout the whole development process was noted.
- The key focus should be a well-balanced mix of housing types, employment provision and improved publicly accessible green-spaces and other environmental considerations.
- The ambition to have a 'cohesive community' is supported but it should be noted how difficult this can be to achieve in reality.
- Proposals should build upon the site's highly visible position as the 'gateway' to the city from the M275.
- The area should be 'special', rather than similar to surrounding redevelopment.
- Suggest the area could have a strong identity as a green village and carbon neutral exemplar development (to include solar panels, district heating, utilising sea power). Plus a focus on waste recycling and the potential to create energy from residual wastes.

- The vision for the area should evolve as more work is undertaken and the masterplan developed to reflect the mix of uses that would support a sustainable and well-connected new community (**PCC Strategic Development and Regeneration**).
- Heritage assets could be better articulated and enumerated in the Vision. Concern is expressed over a lack of historic significance being identified on the peninsula. A further explanation of listed structures and non-designated heritage assets is desired. Various archaeological items from the firing range and the remains of Great Horsea Farm could offer insight into the history of the site if properly identified (**Historic England**).

Opposition to Vision:

- Doesn't represent 'sustainable development'.
- There is an over-focus on housing at the expense of what makes a city and what makes Portsmouth unique.
- Opposed to any reclamation in Portsmouth Harbour. Includes concerns about the impacts of the hydrology of the harbours and their ability to 'self-dredge' with unintended consequences for existing commercial and military activity.
- Opposed to further housing in the city and the subsequent impacts on traffic etc.
- Opposed to development on contaminated land.
- Opposed to development on Horsea Island.
- The Council should look at alternative options for additional housing without reclaiming land.

Suggestions for Alternative Visions for the Development Area

- The scope of the project should include the rest of the Tipner area, including redevelopment the Park and Ride area to provide residential and retail above.
- Supportive of brownfield redevelopment of the area (e.g. the scrapyards and firing range) but not land reclamation of the harbour due to the environmental and ecological impacts.
- Maintain the current high tide line and encourage watersports or wildlife education (e.g. marine ecology with the University of Portsmouth), instead of more cafes and restaurants.
- Redevelopment to quality green space would be preferred.
- An area for leisure and employment, instead of housing.
- Present as location for watersports facilities, with potential for future Commonwealth Games / Olympics.

Biodiversity related comments

- Ignores the consequences of development for terrestrial ecology (focus on marine only) (**Butterfly Conservation**).
- Disagree with the rationale towards habitat designations behind the vision; such designations they should prevent development, not be viewed as a hurdle to be crossed.
- Vision should aim to conserve as much green space as possible.

Hampshire and Isle of Wight Wildlife Trust (HIWWT) object to the vision for the area for the following reasons:

- Loss of Ramsar, SPA, and SSSI habitat likely to ensue from proposed development. The supporting land outside of the designated area (as identified by Solent Waders and Brent Goose Strategy) could also be degraded.
- The existing *Regional Habitat Creation Scheme* struggles to address the loss of saltmarsh habitats across the Solent; compensating habitats losses will therefore prove challenging.
- There is no detail of the proposed mitigation and compensation measures with only impacts on Brent Geese mentioned; the Portsmouth Harbour Ramsar site is designated for a range of important species and habitat types.
- The revised National Planning Policy Framework (NPPF) places significant weight on the protection and enhancement of biodiversity. In the end, it is likely that the use of an effective metric to evaluate the loss and proposed gain of biodiversity will conclude that the proposals are not deliverable due to the potentially 'significant and potentially irreplaceable impact on the environment'.
- They note that the Council will need to demonstrate the lack of feasible alternatives (as per para. 10.4 of the consultation document) and the Imperative Reasons of Overriding Public Interest (IROPI). Mitigation and compensation-related measures will also need to be delivered up front, with their efficacy proven before development occurs.

See Chapter 4 for **Natural England's** comments on the proposal.

Employment/ Leisure:

- Council should look to secure a major anchor tenant for the site (e.g. Ikea) to encourage visitors and visitor spend in the city.
- A modern indoor and outdoor rifle range worthy of being a regional level attraction.
- New grounds for Portsmouth Football Club.
- The actual need for marine employment is questioned.
- Supports further work to determine the feasibility of waterside marine employment. Phasing must be reasonable and conform to infrastructure costs and timing (**Premier Marinas**).

Transport:

- Residents are unlikely to give-up their cars unless Portsmouth has a much more reliable and functional public transport system.
- Difficult to imagine a greater focus on walking and cycling given the proximity of the development area and Tipner East to the motorway.
- It is a 'dead-end site', like Gunwharf Quays, so traffic/parking management will be essential to the success of the development.
- The location has potential; well located for access in and out the city.
- Bridge to Horsea Island could become a 'rat run'.

Other Comments:

- Need to consider 'Social clash' implications of new build house prices and affordable housing in the proposal
- What will happen to the Lorry Park?

Vision – initial Council response:

Responses to the Vision were mixed. Some comments were received relating to the Super Peninsula concept, but it is worth confirming the vision does not specifically relate to reclamation; it is more of a set of principles for the future of the sites.

Regarding biodiversity comments, it is acknowledged that the consultation document could have explained all biodiversity issues in a little more detail, though it is not considered the issue was "underplayed" in any way or that the responses were less well informed as a result. It is recognised that all biodiversity issues, including the full range of habitats and species will need to be taken into account when considering the future of the sites.

3. Issues and Challenges

Question:	<i>Q2. Do you agree with the main issues and challenges described in this document? What would you describe differently?</i>
Topic outline	The challenges facing the proposed Tipner Strategic Development Area were outlined, including the areas where further evidence will be needed. The main topics covered were environmental issues, meeting housing needs, economic development, traffic and transport, flood risk, community facilities, visual impact, key constraints and viability.
Number of responses:	56

12 respondents confirmed that they generally agreed with the description of issues.

One respondent voiced that whilst they thought the development was a good idea, it has been talked about for a long time with no results yet. Another insisted that the Council should try and ensure a high enough quality plan to bring in the investment to support the development.

Others were less positive, for example one felt that the proposal was inconsistent with sustainable development as well as the Council's recent climate change emergency declaration or that the plans are an expression of an 'obsession with growth' without regard for congestion or air pollution. There was also concern that the development would be adding further population to what was considered to be an already overpopulated island.

Respondents described a range of issues to overcome and voiced a variety of concerns which are summarised below.

Environment

Although it is recognised that the area represents a significant opportunity for new development, the environmental sensitivities and constraints of the area are acknowledged (**Gosport BC, Premier Marinas**). Comments on general environmental issues to be address include the:

- potential damage to the surrounding sea bed.
- the need to protect all remaining green areas.

One of the most commonly raised concerns were the potential impacts upon biodiversity in the area, including losses and degradation of local wildlife and their habitat. Comments included the following:

- There should be more respect for the Harbour's natural habitat, the loss of marine life and the overall harm to the SPA. Development should be focused elsewhere.
- Doubt that any proposed compensatory measures would mitigate the harm to the harbour.

- Reclaiming land for housing and building rather than using the open space to encourage well-being and wildlife seems at odds within the summary of issues (**The Harbour School**).
- Consultation document needs to acknowledge the need to delivery biodiversity net gains, a requirement expected to be mandated by government shortly (**PCC Strategic Development**).
- Concern that human development will have the bigger negative impact on wildlife and sea level rise than is referenced in the consultation document. Although rising sea levels will undoubtedly impact on migrating birds (and native seabirds and waders) it is human development and activity that pose the greater threat, so the challenge to maintain a balance between the two is likely to be more severe than perhaps the Council believes in relation to IROPI tests (**Residents Association of Port Solent (RAPS)**).
- Potential impacts of dredging on the sensitive habitat.
- The declines in biodiversity should be addressed though the planning process.

Hampshire and Isle of Wight Wildlife Trust suggests that the site would be better suited as one of several sanctuary sites needed for coastal birds across the region as one of a network of permanent sanctuary sites due to its location and the fact that it is already utilised by SPA birds. Further enhancements and sensitive management at the site could improve its function and capacity, both as a feeding resource and high tide roost site. The scale of development along the Solent coast is resulting in the loss of sites identified as being of importance for waders and Brent geese. The *Solent Wader and Brent Goose Steering Group* has developed a clear strategy for ensuring that a functioning network of sites is maintained across the Solent, this is detailed in the Guidance for Mitigation and Off-setting. Given the scale of the proposals and the likely adverse impacts that will result on the important and highly protected nature conservation sites, they do not consider that it would be possible to deliver net gains in biodiversity as a result of these proposals.

The **Environment Agency** welcome the commitment to achieve environmental net gain from any future development. They agree with the assumption that, under regulation 61 of the Conservation of Habitats and Species Regulations, the proposed Tipner Strategic Development Area has the potential to have a likely significant effect and could potentially adversely affect the integrity of the European site(s) within and adjacent to the development area (para. 10.2); also agree that a more detailed HRA and AA are required to fully identify the extent of the risks to the Natura 2000 sites. They highlight that compensatory measures must not be taken into account until the IROPI tests have been met. Any mitigation and/or compensation needs to demonstrate long term resilience to factors such as future development pressures and coastal squeeze. Any phased mitigation and/or compensation must be in place and functioning prior to any loss or damage occurring. Encourage early engagement with the Environment Agency, Natural England and others to develop an effective programme of coastal mitigation and/or compensation.

In terms of the water environment, the **Environment Agency** state that any works within the marine environment will require liaison with the Marine Management Organisation (MMO). In particular, many activities in the marine area, including construction and dredging, would be likely to require a marine licence from the MMO. Activities should be in accordance with the Marine Policy Statement and with the South Marine Plan. They recommend that a Water Framework Directive (WFD) assessment will be needed due to development potentially having

an impact on the harbour environment. The WFD requires the development not to result in a deterioration of water body status or compromise achievement of the environmental objectives outlined in the River Basin Management Plan. A WFD assessment should focus on the development's potential for impacts on the status of the WFD quality elements, hydromorphology, specific pollutants, priority substances and protected areas (e.g. Shellfish Waters and Special Protected Areas). Consideration should also be given to the potential impacts to the geomorphology of the estuary local to the site, in particular impacts on the adjacent intertidal and subtidal habitats and designated sites. The significant reclamation proposed is likely affect the flow regime of the water body and the impacts of this will need to be considered.

Land contamination:

Concerns were raised over health impacts to people due to proximity of any development to contaminated land as well as poor ground conditions more generally:

- Pollution is a key issue that the Council needs to consider.
- Development could create new opportunities for polluting the environment in the future such as litter polluting the harbour.
- Land remediation should be integrated with integrated as part of any flood defence and protection works. (**PCC Strategic Development and Regeneration**).
- Need to consider the issue of contamination of unexploded ordnance (UXO) from former military use of the land and explosive remnants of war from WW2 (**Fellows International Limited**).

The **Environment Agency** observe that the site has significant areas of concern for land contamination; the impacts of historic land use (military, scrap yard, wharf) that would need to be investigated, risk assessed and addressed. They support the need for further investigations into the extent and nature on contamination on site (para. 17.2) and advise that initial investigations are carried out at the earliest possible stage.

The Environment Agency's principal concerns regarding land contamination would be the impact to underlying chalk principal aquifer (which is shown to outcrop in the northern section of the development area), and any impacts to shallow groundwater which may impact water quality in the SAC. Development would need to ensure that no contamination is mobilised into the chalk aquifer (i.e. as a result of inappropriate piling through areas with contaminated leachate into chalk). It is possible that the tidal sediment could also have contamination issues, which could create some contamination/waste issues if the material is reused on site. If the tidal extent is changed (i.e. through land formation), and there was contamination remaining in underlying sediment, then this could have groundwater issues. As the boundary of the implementation of regulatory controls on groundwater is the lower tidal extent such changes may effectively bring an area under different regulatory controls. Contaminated sediment may require remediation with respect to future protection of groundwater.

The Environment Agency also note that the access road between Port Solent and Horsea East will cross the Paulsgrove historic landfill site. Construction may be technically challenging due to settlement and stability issues within the landfill structure; this will need to be assessed in detail.

Sustainable Construction:

- Incorporate sustainable construction practices into the proposals that support climate change mitigation; promote low utility usage, install solar panelling and consider more innovative waste treatment technologies to reduced energy costs and reduce fossil fuel usage.
- Embed environmentally friendly construction and sustainability into new development particularly housing.

Housing

- Concern that the city is unable to meet the 'unrealistic' housing needs proposed by Central Government methodology and that local circumstances/constraints should be taken into account.
- The Council should ensure high quality housing that benefits people, including the delivery of well-designed affordable housing.
- Do not agree with the approach of trying to deliver unrealistic housing numbers in an environmentally constrained area that will inevitably be faced with challenges in the future. The delivery of new houses should be informed by robust and up-to-date information, (such as ecological network mapping) and delivered regionally rather than trying to squeeze more into already over-developed areas. To adopt this approach is the only way that the Government will be able to deliver on its promise to stop the decline in biodiversity (which should be consider on a strategic scale) and deliver net gains through the planning system (**HIWWT**).

Traffic and Transport

Transport was also a common topic raised. Highlighted issues include:

- Impacts (increased congestion) on traffic in and out of the area including added pressure on the M275.
- Disruption to local traffic from plant vehicles.
- Disrupting the traffic network of the wider city.
- The need for more buses.
- The need to ensure that this would be a cycle-friendly development (**Portsmouth Cycle Forum**)

Transport related suggestions:

- Extend the Park & Ride to be able cope with the additional pressures. Or a new park and ride to exclusively serve the Naval Base for 1000 vehicles.
- Enhance the shoreline as a walking and cycling route connecting key areas.
- Proposed bridge will only be successful if public transportation is enhanced so that residents will be less car dependent. Options should be planned for to avoid worsening congestion.
- Permitted parking for residents only on the site.

The **Portsmouth Cycle Forum** made the following comments:

- Ensure there is potential connectivity with surrounding areas. Address the overall effect on the motorway and extended local road network not only the junction.

- The roundabout should be made safer to navigate into Stamshaw and further afield; this should be done in a manner to slow vehicular traffic, ideally with segregated cycleways and narrower pedestrian crossing points.
- The bridge must be built in a way that allows cyclists to enjoy segregation from busses and pedestrians. An agreement could be sought from Port Solent developers to enhance the lock gates to permit cycling.
- Cycling parking facilities will be needed within the site. Should the potential for cycling infrastructure not be maximized, congestion will only worsen and another residential dormitory suburb will emerge.

Flood Risk

There was concern about rising sea levels and how these might relate to the development, as well as how drainage will be handled, and the need for flood defences (4 comments). One query over how insurance relating to flooding would be addressed for new development and whether insurance companies would cover them. With the uncertainty surrounding climate change and in particular predicted sea level rise, it was thought that development proposals should be located in areas where they will not be at risk of such uncertainty in the future.

The **Environment Agency** welcomed the consideration of flood risk in the document, particularly the need to land raise, which will provide the most robust form of defence against sea flooding. They note that improvements to flood risk management infrastructure are therefore likely to be required from the outset, with consideration given to the most up to date sea level rise predictions in planning for future risk.

The Council's own drainage team should be consulted for advice on Sustainable Drainage Systems. However, the Environment Agency advise that the focus should be on a drainage system enhances biodiversity and recreation, whilst providing sufficient storage to contain the 1% annual estimated probability storm plus an appropriate allowance for climate change, taking into account the anticipated period of potential tide locking. Any type of infiltration system should also be mindful of potential contaminants that could be mobilised.

Service and Community Infrastructure

The following should be considered:

- Securing the delivery of affordable electricity and network heating.
- Additional pressures on infrastructure and services such as those relating to healthcare, education, emergency services (fire, police etc.) which might struggle to cope.
- Development should make use of the existing firing range and develop for wider public use (3 comments)
- Provision of shops, employment sport and leisure uses for the additional population.
- The importance of a mix of uses to support sustainability.
- Relocating Harbour School to a site supporting positive mental health, with green space and sky (**The Harbour School**).

Viability

- Several respondents noted the challenges around the viability of the project and the overall costs, particularly the upfront costs of land reclamation and initial stages of development such as the bridge.
- Concern that the legal tests will be too much of a challenge to overcome.

- Developers should contribute to funding the bridge; without this and without financial support to improve bus and cycle routes, then no development will be able to take place.

Heritage

- Ensure that the naval history is highlighted and brought out through the development. For example, build links with the Naval Base and Whale Island, as well as the magazine buildings and the role the area played in the War.

Historic England raised a number of heritage concerns relating to the area. Tipner has a range of assets that are of historic interest, including the nationally important Tipner magazine complex listed at Grade II; a late 18th century magazine, a mid-19th century magazine, shifting house, cooperage and boundary wall. Heritage should be given full consideration in its own right. Proposals for the development of Tipner, including the potential Super Peninsula suggestion, should be based on a detailed assessment, investigation and understanding of the significance of the heritage assets on the site or which could otherwise be affected by the development. Other points made by Historic England include:

- The document fails to fully recognise the historic significance of the peninsula; no reference to heritage in the Vision nor a specific section on heritage and the main reference to historic interest is in a section headed “Visual Impact”.
- Need to retain the site's heritage assets and conserve and enhance their significance.
- No consideration of the significance of the listed structures, which derives from their intrinsic architectural and historic merit, from their relationship to each other as representative of the historic military uses of Tipner, and from their setting.
- There is inadequate consideration of the potential significance of the non-designated heritage assets on the site. There could be a range of other types of archaeological deposits both terrestrial and marine, from prehistoric to the present day.
- No recognition of the potential for inter-tidal and marine archaeology. A seaward land claim in particular has the potential to impact on marine and intertidal areas which can be rich in archaeology.
- They point to Policy S-HER-1 in the South Marine Plan which was published in July 2018 and which is intended to ensure that proposals do not have an adverse impact on marine and coastal heritage assets, regardless of their designation status.

They advise that the above is addressed work before the site is taken forward through the Local Plan, and that the results of this work should be deposited in the Historic Environment Record and used to inform in a Heritage Impact Assessment as part of the evidence base for the Local Plan.

Other Key Issues

- Security risk due to proximity to the HM Naval Base.
- Constraints by IBM and the military cabling in the area.
- The impacts of land reclamation upon shipping and navigation in the harbour.
- High risk of overdeveloping the site and creating a negative first impression to visitors arriving on the M275.

- Horsea Island is needed as the training school for naval divers, if this closes there will be the loss of jobs and other economic impacts.

Issues and Challenges – initial Council response:

Generally speaking, the comments received in response to the description of Issues and Challenges are broadly accepted, in that the sites are subject to a range of issues and challenges which have prevented other development proposals from coming forward and continue to be relevant for the future of the site. The points raised here will be considered further as the proposals for the site are developed further. Any proposals for the future of these sites will need to pass the test of deliverability.

4. The 'Super Peninsula' Concept

Question:	<i>What do you think of the Super Peninsula concept? What do you think of the potential advantages and impacts as described in the consultation document?</i>
Topic outline	The Super Peninsula concept looks at the potential to extend the Tipner development area through land reclamation, increasing the quantum of development which can be delivered and creating a new community for the City.
Number of responses:	52

16 comments supported the proposal for land reclamation to enlarge the Tiper Development Area into a 'Super Peninsula' subject to certain issues being satisfactorily addressed.

Support 'Super P' proposal:

- Could be a really exciting development for Portsmouth with potential long term advantages.
- All such opportunities should be investigated given the scarcity of land and population increases.
- Portsmouth has a historic of successfully developing reclaimed land.
- Potential benefits of increasing housing, jobs and retail provision
- The area could be a potential asset for Portsmouth and could allow people to enjoy the opportunity that the area offers.
- Connecting the two area of land would utilise the whole space and increase land mass in a potentially well situated area (with the addition of the bridge and improved public transport connections), as opposed to building on green fields out of town.
- A larger land area would make this a more viable development overall with the benefits of the prospect of an attractive waterfront.
- The mixed development concept would reduce pressure on Port Solent, improve business prospects for the area (especially marine industry complementing BAR at the Camber and Port Solent itself) and will improve the character of a neighbouring locations.
- Supportive of the Super P concept if the following can be addressed:
 - Financial feasibility.
 - Offsetting of the likely environmental damage by appropriate mitigation and compensation.
 - Environmental, historical, natural and economic issues.
 - Modelling of hydrodynamic implications.
 - There is infrastructure in place to support the plans.
 - All aspects of design and other aesthetic concerns.
 - Consideration is given to the material used for landfilling.

The Super-peninsula concept has the potential to deliver a more sustainable and self-contained development, with greater place-making benefits when compared with that which could be accommodated on the existing land areas at Tipner/ Horsea, or elsewhere within Portsmouth in order to deliver the City's needs. The proposal is of a scale that has the ability to bring about the protection and enhancement of the biodiversity of the SPA and SSSI, subject to deliverable and viable compensation biodiversity being available. The Portsmouth Harbour SPA is subject to current impacts from recreation disturbance, impacts from poor quality surface water runoff, impacts from coastal squeeze, long term significant impacts

from sea level rise and loss of intertidal – the Super-peninsula concept has the potential to redress these impacts, offer significant environmental advantages in line with current and emerging Government policy, alongside major community and economic benefits (**PCC Strategic Developments and Regeneration**).

Concepts for the Area:

Others (7 comments) felt the concept for the Super P area needed to be more ambitious or consider alternative approaches unique to the nature of the area:

- Lacks vision in the scale of proposed development - a large multi storey development would solve all of Portsmouth's housing needs.
- Should look to create something visually connected, high quality and 'forward thinking' as the gateway site to the city. A landmark building on the corner of the proposed section B should be strongly considered.
- Instead of a bridge, build a causeway with gates to allow the sea water to flush the Mountbatten basin to avoid stale water. It would provide a sea-water park whilst providing protection against sea rise when combined with a similar gated structure at Eastern Road.
- Provide more than a few local shops and a community centre, e.g. a pub and a proper precinct.
- Allow access to Hilsea through the new development on the Tipner Park & Ride side to access schools in Hilsea and Highbury College and to ease the pressure on the M275 and Western Road.
- More waterfront access is possible by creating a network of canals. This would give further opportunities for marine employment activity, as well as accommodation in houseboats.
- More emphasis is needed on green energy like electric bikes and push bikes for the area. Including consideration of a tram system linking the area to Port Solent, Fareham and Gosport.
- 'Think big' / 'make a statement'; an outer crescent and an inner star (like the Portsmouth emblem) would totally raise the profile of the city on the world stage. Similar to Palm Jumeirah in Dubai. The outer crest would be westward facing and benefit from fantastic sunsets towards Portchester Castle. The associated property prices (with deep moorings for super yachts) would attract more wealth and investment into the city. The inner 'star' could offer more affordable housing plus industry. The calmer, protected inner waters would then hopefully be conducive to a rich marine life.

Object to the Super Peninsula ('Super P') concept

10 comments objected to the proposal for land reclamation under this question, largely due to the potential environmental implications given the sensitive and high value setting of the proposal as well as the impacts of additional housing on the city. Comments included:

- Some expenditures (e.g. the Horsea bridge) out of all proportion to the economic benefits.
- The scheme does not have any potential advantages; any advantage is outweighed by the problems caused.
- As a concept, the idea of a new community on the fringes of the city is a good idea, but it is a bad idea at this location.
- Has the potential to be just as detrimental as the Vision for the existing Tipner Strategic Development Area.

- Portsmouth is already an overcrowded island with complex social needs. How will the balanced community develop, what schools and shops will be included in the development?
- The firing range or other side could be better used to create affordable recreational activities to attract visitors, create jobs and minimise housing as too many people already. Potential for facilities such as an ice rink, wall climbing to match other cities.
- Should be reserved for leisure and employment. There is no space in the city as a whole for extra housing and extra vehicles from new residents.

Environmental impacts

- The Super Peninsula initiative is inconsistent with sustainable development and the Council's 19th March 2019 Declaration of a Climate Change Emergency.
- The reclamation and rejuvenation of the land as projected in the document is not achievable. The national and international environmental designations assigned to the three harbours and the area intended for reclamation make the project unsustainable; as per the Portsmouth Football Club plan to develop Farlington Marshes in the early 90's.
- There will be a significant negative impact on the Portsmouth Harbour SPA and inevitable damage to the natural environment.
- Building more houses is not a sufficient justification of significant habitat losses.
- Full of severe geotechnical challenges.
- The area is too environmentally sensitive for it to be considered. The Primary Support Areas for Brent Geese and Waders, SPAs, SSSIs and Ramsar sites need to be protected; none of these designations should be built on or impacted negatively in the way that is proposed.
- The resulting habitat loss critical for protected Brent Geese is unacceptable in the context of meeting conservation duties and adherence to Natura 2000 legislation.
- Any mitigation strategy for Brent geese that involves creating new foraging areas in terrestrial locations or somehow improving existing intertidal areas is unlikely to: a) work; b) be close enough for the geese to use and c) will not compensate for any impacts on other species.
- There will be many broader impacts on water quality, sedimentation as well as vulnerable species such as eel grass and other BAP species (e.g. seals and sea horses) that are regularly recorded within the harbour.
- Detrimental effects on businesses reliant on a healthy Solent including fishing and tourism.
- The Council should be looking to deliver their housing allocation in a more sustainable and less environmentally damaging location. Given the predicted increase in sea level, and the adverse effect that will have on the sensitive nature conservation sites, it will not be possible to demonstrate that the proposals can be mitigated or compensated, since there are no suitable areas in the region where new SPA habitat could be created. Impact on waders such as Curlew and Redshank which both feed in proposed reclamation area is not considered and there is no suitable alternative. Impact of reclamation on other parts of the harbour are not currently proposed to be studied (**HIWWT**).
- Potential to impact fisheries taking place in Portsmouth Harbour which include net fisheries, rod and line, whelk potting and the intertidal bivalve dredge fisheries which is known to overlap with the wider project area. A loss of intertidal area would restrict the area of fishable ground and as the proposal develops this should be assessed and compatibility determined with the above policy should be demonstrated. Proposals should be in line with policies S-Fish-2 and S-MPA-1 of the South Marine Plan. (**Southern Inshore Fisheries and Conservation Authority (SIFCA)**).

Natural England objects the Super Peninsula proposal. The Super Peninsula option is contrary to the conservation objectives of the Portsmouth Harbour SPA and Ramsar site and will damage or destroy the interest features for which Portsmouth Harbour SSSI has been notified. We strongly recommend that the Council progresses alternative options to meet housing need that are less environmentally damaging and more sustainable. Super Peninsula is a complex proposal that will result in a number of significant impacts on the environment, including:

- the loss of around 22 hectares of SPA and Ramsar habitat and loss of functionally linked land;
- changes to hydrodynamics and coastal processes as a result of the development's extension into the marine environment that could lead to further loss of habitat;
- requirements for further coastal defences potentially giving rise to further habitat losses;
- impacts upon water quality (in particular additional nutrient loads from sewage) that could lead to impacts on birds' prey availability (e.g. through the profusion of algal mats overlying mudflats) and additional loss of habitat (e.g. smothering of saltmarsh habitat from algal mats); and
- an increase in disturbance pressure to overwintering birds from recreational activities in the Solent as a result of additional residents.

The proposal is likely to have a significant effect on the Portsmouth Harbour SPA which is afforded protection under *The Conservation of Habitat and Species Regulations 2017*, as amended (under the 'Habitats Regulations'). The site is also designated as a Ramsar site and notified at a national level as the Portsmouth Harbour SSSI, the latter of which would need to be assessed in-line with the *Wildlife and Countryside Act 1981*, as amended.

Natural England explains the 'tests' the Super Peninsula proposal would need to address for this Option to progress:

Derogation Test: The tests in Regulation 64 must be passed and this involves confirmation that there are no feasible alternatives and the proposal must be carried out for imperative reasons of overriding public interest.

In order for the Super Peninsula to be legally compliant, the derogation tests would need to be met. It is Natural England's view that this would be extremely difficult in this case.

Alternatives test: The Super Peninsula will deliver an additional 1000 residential dwellings. The competent authority must be able to demonstrate objectively the absence of feasible alternative solutions to achieve the objectives of a plan. From the information provided, the objectives include meeting housing need and creating a more balanced community with a better mix of homes, jobs and facilities.

Any alternatives assessment should consider options including, inter alia, 'do nothing', neighbouring authorities delivering any shortfall in housing need under Duty to Cooperate, higher densities and taller buildings, improving links with existing mixed use development in the city. Consideration should also be given to alternative locations outside of the city that could deliver a similar development in a less environmentally damaging way.

It is Natural England's view that the stringent alternatives test would be very difficult to pass in this case.

Imperative Reasons of Overriding Public Interest (IROPI): If it can be established that there are no feasible alternative solutions, the competent authority must be able to identify “imperative reasons of overriding public interest” (IROPI) that justify the plan or project despite the environmental damage it will cause. These reasons include human health, public safety, beneficial consequences of primary importance to the environment and those relating to social or economic benefit.

When identifying IROPI, a competent authority must consider whether all three elements of IROPI are met:

- Imperative: the plan or project is necessary (whether urgent or otherwise) for one or more of the reasons outlined above.
- Overriding: the interest served by the plan or project outweighs the harm to the integrity of the site as assessed in light of the weight to be given to the protection of such sites under the directive.
- Public Interest: a public good is delivered rather than a solely private interest.

This assessment should assess the necessity and urgency of the project. The greater the harm to the designated site, the greater the overriding interest needs to be to outweigh this harm. It is Natural England’s view that the direct loss of 22 hectares of SPA habitat and other additional impacts would be a significant loss and the overriding interest must be sufficient to outweigh this harm.

Natural England’s view that the Super Peninsula option would be contrary to the conservation objectives of the internationally protected sites (and would not meet the revised NPPF’s requirements set out in paras. 170, 171 and 175) and that any Habitats Regulations Assessment (HRA) should conclude that it cannot be ascertained that the proposal will not adversely affect the integrity of the European site.

Super Peninsula Concept – initial Council response:

Overall comments were mixed regarding the Super Peninsula concept. Some saw the potential advantages of land reclamation as a way of meeting the city’s needs and noted the previous reclamation which has been carried out.

However, the significant objections received from environmental groups and Natural England are recognised. The Council accepts that significant further work would be required to investigate the justification for any land reclamation. The advice from Natural England regarding the derogation test and the alternatives test is understood. The Council always anticipated that development of the sites would be difficult and that delivery of super peninsula concept would be subject to the most rigorous testing and requirements for justification. Nonetheless it should be recognised that the onus is on the council to maximise the potential at this location, subject to those legal and environmental constraints. At present it is considered that technical work on the potential of the sites should continue, with further consideration and evaluation of options before an appropriate approach to Tipner and Horsea is set out in the draft Plan.

Some of the comments received to the Super Peninsula concept (i.e. layout of specific uses) are too detailed to be fully addressed at this time. However others address fundamental issues regarding the appropriateness and deliverability of the super peninsula concept.

5. Strategy Plan

Question:	<i>Do you have any comment on the Strategy Plan at this stage?</i>
Topic outline	The Strategy Plan diagram sets out the broad outline proposals for Tipner Development Area
Number of responses:	29



One response supported the Strategy Plan. Specific comments on proposed outline plan included:

- Exclude development on inter-tidal mud area; land reclamation following the Council's climate change emergency declaration 'would ridicule the Council'.
- The disposition of land uses appears to be appropriate but would need to be subject to environmental and feasibility testing. E.g. the area shown could be flooded at certain times of the year due to high tides and weather conditions.
- Do not build upon the wooded area on Horsea Island.
- Plan needs more human approach focusing on a city fit to live in and not cramming any more people in.

- The plan doesn't show clearly where the new road will be; it seems to go straight into the Defence Diving School lake instead of connecting to the road layout on the Country Park leading over to Port Solent. If a bridge is to be built to join the two areas it isn't clear from the plan.
- The red line on the plan should show Hilsea creek still complete and able to flow from Langstone to Tipner.
- A dotted or dashed red line across the channel separating us from the rest of England might make it clear that the Council doesn't intend to fully fill in the channel.
- Leave the water's edge for residential development instead of employment - is marine employment actually needed?
- The western side of Tipner should remain an open space to retain the aesthetically pleasing character of Portsmouth Harbour.
- Agree with limiting vehicle accessibility.
- Social housing should be included.
- It is questioned whether the proposal needs to be so large.

Other comments focused on the wider range of opportunities or alternative proposals for the site under the following topics:

Transport

- This scheme should be considered alongside a new transport system (light rail/monorail).
- A transport system linking the Hard with Commercial Road, the International Ferry Terminal, Tipner Development with an extended Park & Ride, Port Solent, a new station at Paulsgrove (to serve QA Hospital) and onto a new transport interchange at Cosham where it would join the existing rail system. The bridge is fundamental to both projects. The current focus on improving the air quality in the City could trigger supportive Central Government funding.
- Create a new town and transport hub to encourage out of town traffic to spring board into the rest of Portsea Island by frequent cheap 24/7 public transport. It is considered that the current public transport system is not fit for purpose and it is not safe or desirable to ride a bicycle in Portsmouth.
- Include a high quality sea view walk in the designs around the entire peninsula encouraging outdoor walking and views of the sea.
- A coastal cycle route from Fareham, Portchester, Port Solent, Horsea, Tipner to Portsmouth.

Environment

- Need to consider that Portsmouth is already the most densely populated island in the UK.
- Should aim to create environmentally friendly sustainable buildings especially housing, prevent more pollution, and enhancing shoreline as a walk to key areas
- Clear up the contamination.

Economic Development

- The breakers yard offers an opportunity for a first class architectural museum or similar. Its aspect facing Portchester Castle would complement a modern building. (e.g. Bilbao Guggenheim and similar).
- The Council should look to promote a forward thinking approach similar to the Solent Local Enterprise Partnership (LEP) work with regard to Fort Blockhouse in Gosport

Points of clarity / comment

- It should be clarified that The Harbour School is a special school for SEMH needs (**The Harbour School**).
- The inclusion of a Primary School and community facilities will need to be coordinated by the Council given the significant viability challenges likely faced by the proposal.
- The plan doesn't show the recently constructed lorry park.
- There were positive and supportive thoughts expressed at the exhibition on 9th March.
- Updates on the project/ consultation are requested, particularly on environmental matters.

Strategy Plan – initial Council response:

Many of the points raised on the Strategy Plan are more concerned with the future of the Development Area and are also considered in other parts of this consultation. All comments will be considered further as work progresses.

In response to some specific points raised in the consultation comments:

- *There is no intention to block access to Tipner Lake.*
- *The diagram shows an indicative bridge link across to Horsea and a public transport corridor on through Horsea Country Park.*
- *The super peninsula concept does not currently include reclamation of land to the north of Tipner west in area "B" on the Strategy Plan. This will be made clear in any future publications.*

6. Further work

Question:	<i>Tell us what you think of the summary of issues to be considered. Have we missed anything? Would you describe anything differently?</i>
Topic outline	The consultation document broadly outlines the key issues that would need to be thoroughly assessed for any development proposals for Tipner/ Horsea Island and/ or the development of the Super Peninsula. This included the need the development (inc. meeting housing needs), environmental issues, economic development, traffic and transport, flood risk, visual impact, viability and the possible mix of uses the site area(s) could provide.
Number of responses:	44

11 responses considered that the consultation document broadly covered the issues that would need to be address by the potential development proposals for Tipner. Other comments focused on the more detailed considerations under the following topic areas:

Land reclamation/ development and the Portsmouth Harbour environment:

- The Marine Management Organisation's South Marine Plan marine policies S-Fish-2 and S-MPA-1 are of relevance to the project and should be considered against any future application.
- **Southern Inshore Fisheries and Conservation Authority (SIFCA)** can help the Council to ensure that the local fishing activities are understood so effective consultation with the industry can be undertaken and where appropriate mitigation can be considered.

More information needed on:

- The feasibility of land reclamation and dredging associated with potential further marine development prior to determining the capacity and the extent of the development area.
- The high level principles for the SPA reclamation mitigation options and SSSI/ Ramsar mitigation as well as more details on proposed mitigation scheme itself.
- Impacts on the Portchester Conservation shoreline with suitable flood protection measures for this part of the coastline (instead of the proposed sheet piling).
- Impacts upon the main navigation channel to the upper harbour.
- The impacts of development and changes in sea flows / currents, the deposition of material into existing channels and coastal erosion - including impacts on tidal flow into Paulsgrove Lake and beach erosion issues at Hayling Island.
- Impacts on flood defence requirements.
- Impacts of dredging on the hydrodynamics of the river, and the subsequent impacts on this on the feasibility of the proposed land uses and Super P proposal (**Premier Marinas**).

- As the loss of intertidal area would restrict the area of fishable ground (net fisheries, rod and line, whelk potting and the intertidal bivalve dredge fisheries) the impact of this should be assessed and compatibility determined with South Marine Plan policy S-Fish-2, which follows a 'avoid, minimise and mitigate' hierarchy (**SIFCA**).
- The assessment of impacts on the conservation objectives of the designated sites (under South Marine Plan Policy S-MPA-1) in combination with the protection afforded by the SIFCAs management of the area (**SIFCA**).

Alternatives uses for the area:

- Development as public open space instead; to meet the demand in the city and encourage well-being and wildlife.
- Alternative plans for the area (currently wasted land) if current proposals are not successful

Housing:

- More details required overall.
- Houses need to be affordable with integrated parking.
- Consider 'floating homes' (modern house boats); a low cost, innovative solution for flood prone, sensitive and constrained areas as seen in Holland.

Employment:

- Consider the impact of the employment/ commuting requirements of additional dwellings in this location.

Traffic and Transport:

- Even if the new development is walkable and well linked to the city, a lot of people commute out of Portsmouth for work and will have to drive.
- Situation will be exacerbated by increased traffic using the junction of the M275; more consideration towards how this will impact the flow of traffic in and out of the city during busy periods.
- Needs an integrated transport strategy with links for cycles/ pedestrians into Portsmouth.
- The park and ride is too small and located too close to the city centre
- A cheaper bridge design, supporting pedestrians and cycles only, might deliver benefits sooner and reduce traffic volumes entering Port Solent from neighbourhoods such as Tipner. (**RAPS**).
- Further investigation of the bridge link will be essential to determining the capacity specifically of Horsea Island (**Premier Marinas**).
- Consider an additional train station.
- More information on how resident and business parking will be managed.
- Need to further analyse the proposed bridge capacity and feasibility; this will be essential to determining the capacity Horsea Island (**Premier Marinas**).
- More detail needed on transport proposals overall.

Visual impact:

- Consideration of improving the appearance of Tipner West as one of the 'gateway' entrances to the city.

Sense of Place/ Leisure:

- Develop area as a location where people would want to visit from outside of the area for picnics and walks. E.g. an appealing harbour side promenade that continues to the new Horsea Island Country Park.
- Opportunities for leisure and sport for local, national and international competition; suggestions include space for recreational target shooting to continue and a new ground for Portsmouth Football Club.

Heritage

- Absence of a separate heritage section in this proposal is a 'massive oversight' in a harbour with as much history as Portsmouth. Listed buildings are only referenced in a section on visual appearance, and heritage does not receive due weight in the proposal.
- The importance of the area to naval history should be highlighted (the links to the Naval base and Whale Island), and the role the area played in World War II including how it was used before and after this event. E.g. a heritage walk to Magazine buildings with signage.
- The most significant heritage omission is considered to be the landing craft maintenance and repair facility on Horsea Island (and its three corresponding 'dolphins'); a Second World War landing craft repair site, known for the turnaround of landing craft damaged at Normandy in the summer of 1944. Much of the concrete behind this site dates to a Second World War wireless station. Similar sites (inc. the Mylor site in Cornwall) have been scheduled by Historic England. The view is that although it not yet been listed by Historic England this should not be a reason to assume it is not significant. It is requested that no development should be permitted at this location unless the site is preserved and incorporated into the development and/ or development is sympathetic to its setting.
- A formal Heritage Impact Assessment is vital requirement if these plans are to be taken forward.

Community infrastructure

- In addition to a new school, the additional medical facilities and other emergency services (e.g. Police) should be considered. Otherwise the existing surgeries surrounding Tipner are likely to become oversubscribed.
- Youth activities included opportunities suitable for Portsmouth's low income families.

Other Comments

- Hopefully the financial challenges of delivering such a difficult site can be overcome.
- The next steps identified are comprehensive, but do not include the bridge link as a specific item of consideration, which it should as this is a clear consideration in phasing, capacity and viability.
- The water channel to Port Solent should be made deeper.

Further Work – initial Council response:

The comments raised here are largely concerned with requests for additional information and recognition of certain issues. Broadly speaking, these comments are accepted. It is envisaged that as work on the Tipner project continues, additional detail and clarity on proposals will be available for the public and others to comment upon in due course. In the meantime, the comments here will be reflected upon and will inform the project as it progresses.

7. Other Comments

Question:	<i>Do you have any other comments at this stage?</i>
Number of responses:	48

Support for the Proposals:

- A 'wonderful opportunity' to deliver much needed housing and employment; the right move for the city (two comments).
- Support and welcome the development of Tipner and Horsea which looks well thought out (one comment).

Object to the proposal for the following reasons:

- The significant harm this will cause to Portsmouth Harbour and the internationally and nationally important habitat sites (SPA, SAC, Ramsar and SSSI) including the significant habitat loss from land reclamation. Such areas should be protected for future generations.
- Portsmouth is fortunate in that it is located in an area teeming with wildlife and internationally renowned avifauna; this should be celebrated and protected by the Council rather than destroyed (**HIWWT**).
- Reclaiming land would worsen existing losses to wetlands from climate change, sea level rise and coastal squeeze.
- Proposals indicate little concern for our natural environment and the habitat of the harbour.
- Given the scale of current and future environment issues, the logic as to why the proposal is even being considered is questioned.
- Wildlife (nationally and locally) is already in decline and the proposal further contribute to habitat and wildlife losses, particularly:
 - Impacts on food sources for breeding fish (small fry, mullet and shoal bass).
 - Tipner cockle, winkle and large ragworm and lug worm beds, harbour sand hoppers and breeding areas for shore crabs.
 - Further losses to already reduced shore-life, including marshland losses from the motorway and North Harbour.
- Disbelieve that mitigation programmes, which allow house building to continue across the Solent, are successful. E.g. continued disturbance to wildlife despite the Bird Aware strategy. Any 'secondary areas' provided for wildlife would not be equal to the natural habitat in which they thrive, causing disruption for many years.
- Land reclamation would displace water.
- The proposal isn't considered to be 'sustainable development'.
- The site is unsuitable for housing.
- Too many new homes are proposed and there are already too many people in the city.
- Housing with waterside views will not be affordable housing.
- Proposals will add to overcrowding, less open space, traffic and parking problems. The use of the park and ride should not be relied upon to mitigate traffic impacts as it is believed that people don't use it.

- Council tax for residents will increase due to the additional pressure on services
- The cost of the scheme could spiral uncontrollably with unexpected problems from building and flood management.
- The loss of the view out to historic Portchester Castle from Alexandra Park would take away the views of the land have been around for 100 years. Coastal views provide a 'sense of freedom' and a 'healthy outlook' some of which has already been lost to sea defences around the north of the island.
- Adverse impacts on health and well-being. Lessons should be learnt from the poor results of health and well-being surveys from other part of the city that are overpopulated with little green space. The open space and walk along the Lido in Hilsea should be protected; extra development in this location would add stress and pressure.
- Fears that in future even more of the harbour could be reclaimed if this proposal was to be allowed.

Suggestions for the Tipner Development Area

- Create a public harbourside promenade round the whole site like on Southsea Seafront.
- Create a landmark gateway to the City.
- Prioritise design outcomes that provide for the best quality of life.
- Development should have a strong emphasis on an exemplar green, carbon neutral development including: solar panels on all rooftops to power homes, use of district heating and utilising possibilities to make use of the sea to generate power (e.g. sea water powered district heating scheme in Norway).
- Design as a 'destination' and new green 'lung' for the sub-region.
- Take advantage of its harbour-side location; a 'new waterfront district' for business, housing, leisure, culture and local shopping with a creative design and clear identity.
- Create something of great leisure/ amenity value to the area and the city. E.g. the coastal perimeter could be wide landscaped promenade area, shared with walkers and cyclists, with opportunities to stop and enjoy the views and bird life (similar to the new Tipner Lake cycle path area).
- Green play areas for children away from traffic noise and pollution.
- Include a park for dog walkers.
- Include social enterprise uses.
- Maritime residential theme incorporating both Traditional and Quayside housing and floating homes. E.g. of Ljburg in the Netherlands.
- Requests that the southern (non-shooting range) part of the Tipner peninsular, which is the old Stampsey (or Stamshaw) common (a historic asset) is retained as open space/ drainage if possible.
- Landscaping will be important; preference for Plane trees expressed.
- Retain the thickly wooded eastern end of Horsea Island to enhance the setting of the new country park, rather than developing for marine related employment uses, or retain the woodland as part of a high quality housing development.
- There needs to be access to the sea for small boat users - such as a good public slipway, ideally into deep water (there are none available locally) with good parking. Such facilities could attract sea-front retail, cafes etc and enhance the area.
- Suggested name: 'Saxon Harbour' to promote its special cultural identity. Promote and enhance the Saxon heritage and cultural identity of the northern harbour; possibly including an iconic landmark symbol at the top of the hill to promote the city's cultural identity.

- Create a diverse "village" community, instead of the 'common dormitory housing estate'. Include affordable housing, housing for the elderly and housing for families and community buildings.
- Make Tipner Portsmouth's answer to Poundbury in Dorset
- Build using latest design in prefab type housing, financed by on-going income from the International Port.
- The site is visually sensitive. Consideration should be given towards the visual impact of the proposal from Gosport, ensuring that all frontages facing the harbour will be of the highest quality (**Gosport Borough Council**).

Alternative locations for additional homes / alternative uses for the Tipner Area

- Leave as open space or other type of facility for the city e.g. new greyhound stadium
- Use some of the area for the relocation of Portsmouth Football Club and build new dwellings in Fratton instead.
- Consider alternative locations for housing that don't involve filling in the harbour. E.g. the old tip at the end of the Eastern Road.
- Build more on the land you already have (higher densities and taller buildings) before land reclamation is considered.
- Utilise the Tipner Lake area for the Tipner and Hilsea communities; aquatic sports venue e.g. waterskiing, canoeing, rowing, sailing, paragliding, paddleboarding and sporting events.

Approach to Housing targets and Affordable Housing

- Council need to make a stronger case to Central Government to make clear how little land there is in Portsmouth to be developed, so they don't set unrealistic targets.
- Portsmouth's road infrastructure is already over congested, the city is overpopulated and services are overcrowded - it doesn't have capacity for extra homes.
- Housing 'need' and targets should take account of the fact that Portsea Island is overpopulated and services are overcrowded.
- To provide truly affordable housing, energy costs would also need to be considered.

Biodiversity comments:

- Appropriate mitigation should be provided for any impacts upon Brent Goose sites, in line with the Solent Waders and Brent Goose Strategy. Any proposals should strive to deliver biodiversity net benefits (**Gosport Borough Council**).
- Too much focus on the impacts upon Brent geese, what about the fish, bird feeding worms, shrimps, crabs, and macrobiotic life that live in the tidal marshland.
- Horsea (area A) is home to a DEFRA BAP Priority species (No. 945) of butterfly, now also on the IUCN Red List, and over 30 species of bird, including the Song Thrush (BAP Priority). Tipner Ranges, last surveyed circa 2000, hosted the Small Heath butterfly, another DEFRA BAP Priority species². (**Butterfly Conservation**).
- Carry out a survey of the seashore life that would be lost from the proposal, including the spring/ summer period.
- Increase the biodiversity of sea defences; put dredged sea ballast and large rocks outward from the sea wall for at least 5 meters to encourage bladderwrack seaweed.

² See: <http://jncc.defra.gov.uk/page-5161>

Transport related suggestions/ comments:

- The site has potential for good connectivity.
- The new bridge should have a cycle/ walking route plus taxi access and perhaps other types of light transport.
- Allow all residents in the new area parking in the Park & Ride
- The new bridge should be well connected well to wider cycle-routes between Portchester and the wider City area.
- Support the creation of high-quality walking and cycling routes around Tipner, which will help provide sub-regional health and wellbeing benefits. Such routes would also benefit from interpretation panels, explaining areas of interest around Portsmouth Harbour, including in Gosport. There is scope to link these elements together in a around-the-harbour cycle trail (**Gosport Borough Council**).
- Consider having a much cheaper pedestrian bridge as part of the first stage of the development as part of the new country park (possibly a rustic style or temporary pontoon) in order to establish a network of walking routes as early as possible, rather than wait indefinitely for a very expensive road bridge.
- Re-orientate the country park towards Tipner via a pedestrian bridge rather than establishing the main access via a large car park at Port Solent which would draw in extra traffic via the A27 and Port Way.
- Include a pedestrian link under Tipner Bridge from potential development of old Pounds scrapyard/ greyhound stadium site east of M275 west to new road link.
- Reduce the proposed country park car park in size and cost; the money saved could help to fund a cheaper pedestrian bridge and car park at Tipner in the short term. This would better serve the needs of the people of Portsmouth.
- The impact of additional cars in the city would need to be addressed.
- Make the new development a car free zone.
- Providing good car parking and road access would be challenging for the proposed number of new residents. While it may be possible to reduce car dependency, cars will still be needed and will need to be accommodated.
- Support new public transport options between Gosport and Tipner/Portsmouth. This could include exploring the viability of new waterbus services (**Gosport Borough Council**).

Community Infrastructure:

- The city infrastructure is already under served; consider the addition needs for transport, parking, healthcare, schools.
- Support the retention of the Harbour School in the current building (**Harbour School**).
- Opportunities for sports and leisure must be incorporated.
- There would be a need for extra medical facilities to serve the development, certainly another doctor.

Economic Development, Employment and Tourism:

- Consider how to add to, and incorporate, the City's tourism and heritage offer alongside the proposed residential development.
- An international standard concert hall and/ or art gallery to support Portsmouth as a recognised City of Culture?

- Providing maritime employment would be desirable, if there is the demand for it. The UK has many under-used marine-side industrial areas - what kind of industry or employment is envisaged? Are there any companies making enquiries about possible locations and facilities here?
- Create a high-tech park; hi-tech industry is the way forward and the site would have excellent access to the motorway.
- The scale and nature of new employment floorspace should be considered (beyond what is set out at para. 12.4). This represents an outdated consideration of 'marine-related' employment and does not consider emerging and changing businesses in the industry and sector, including the need for leisure and tourism in relation to marine business as a complementary offer for users and visitors, and how technology is affecting marine retail services for example. The need for flexibility is supported (para. 12.5) and we would emphasise that this clearly reflected in the policy approach (**Premier Marinas**).

Gosport Borough Council support the aims of the Tipner Strategic Development Area in providing new homes and employment floorspace, which will help meet local and sub-regional needs. With particular for support additional marine and maritime employment space, and deep-water access to Portsmouth Harbour, which will strengthen the harbour's position as an area of marine excellence. However, the Council has concerns about the environmental impacts of the proposal and the considerable uncertainty over the deliverability of the scheme due to:

- the partial loss of, potential detrimental impacts the SPA / Ramsar / SSSI, which is already under significant pressure. It may be difficult to meet the IROPI Test in this instance; and
- the cost of land reclamation and likely mitigation/ compensation measures.

For Statement of Common Ground with the other PUSH authorities it will be important to consider an option which includes the Super Peninsula project, and one that doesn't, to ensure that other options are considered for potential housing development in the sub-region. It will also be important to understand the potential phasing of the development to assist the PUSH work.

The protection and enhancement of the listed historic assets at Tipner are of importance to the 'Portsmouth Harbour story', supporting the inter-connected local visitor and heritage economy.

Other comments on the proposed scheme:

- Scheme unlikely to go ahead given the constraints of protected habitat.
- The scheme should be progressed as quickly as possible as costs will rise if there is too long a delay.
- Reclaiming land is worth investigating, preferable to increasing density on the island.
- Land contamination issues will be a constraint on development.
- Fellows International have previously been involved in the Tipner regeneration programme and would welcome the opportunity to discuss how we could assist identify and mitigate any unexploded ordnance (UXO) risk.
- The Marine Management Organisation's (MMO) South Marine Plan was published on the 17th July 2018, becoming a material consideration for public authorities with decision making functions. All public authorities taking authorisation or enforcement

decisions that affect or might affect the UK marine area must do so in accordance with the *Marine and Coastal Access Act* and the *UK Marine Policy Statement* unless relevant considerations indicate otherwise. For more information see the MMO's online guidance and the Planning Advisory Service soundness self-assessment checklist.

- Request information on next stages with a timeline once further information is gathered.

Landowner John Pounds:

- Would strongly object to any land reclamation in the small amount of land identified to the west of the proposed new road within Area B which adjoins a working quay.
- Comments are made on the assumption that the proposed areas of reclamation will not be significantly changed from that shown on the strategy plan, and more importantly will not be extended to include land within Area B or interfere in any way with John Pounds' navigation rights.
- No objection in principle to the development of the Tipner Super Peninsula subject to sufficient highway capacity being retained to allow for the future development of my John Pounds' land within Area B.
- The consultation document (para. 13.2) notes that the capacity of this junction is likely to limit the development achievable at Tipner; evidence is therefore required to demonstrate that the roundabout providing access to the M275 has sufficient capacity to accommodate the comprehensive redevelopment of land to the east and west of the M275 alongside that proposed on the Super Peninsula.
- John Pounds' land to the west of the M275 is currently underutilised in development terms and it is therefore requested that sufficient capacity needs to be preserved for its comprehensive redevelopment.
- Given the proposed direct link to and from the motorway to the land in the control of the Tipner Regeneration Company (TRC) to the east of the M275, any assessment of junction capacity must also take into account development on this land. Whilst planning permission exists for development to the east of the M275, the quantum of development was constrained by the access onto Twyford Avenue. Any future assessment of junction capacity should therefore take into account a more efficient use of the site to contribute towards the significant housing requirement in Portsmouth. As well as ensuring that the capacity of the junction is sufficient to accommodate traffic from the comprehensive redevelopment of the strategic development area, account must also be taken of the need to ensure that it allows for sufficient emergency access points.
- John Pounds' land is currently accessed via a road under the M275. This will no longer be suitable for emergency vehicles once the land is raised and therefore an additional emergency access route will be required to Area B which must be considered in any transport assessment.
- The strategy should not preclude a residential led development on Area B (identified in the consultation for marine employment); request that it is amended to allow for marine development and/or residential development.
- Clarity needed on how the significant costs of the reclamation will be funded, how much compensatory habitat will be required to offset the impact on the SPA, where it is to be located or how it is to be secured.
- Any policy for the future development of Tipner and Horsea needs to be drafted in such a way so as not to prevent any development on the wider Tipner site coming

forward until these critical issues relating to the Super Peninsula have been resolved."

Other comments:

- Pollution is caused by traffic jams created by cul-de-sacs, roundabouts and traffic lights.
- Portsea Island is small so it should be possible to have a clearway ring road around it and one way systems with no right turns and a 500 metre maximum walk to frequent public transport loop.
- Focus should instead be on building a huge overnight car park with park and ride facilities and investing in the city centre.
- Concern about environmental vandalism from a proposed bridge like trolleys etc being thrown into the harbour like at Ports Creek etc.
- Too much building work in the city.
- Have a toll bridge between Portsmouth and Gosport
- Concerns that the City Council is also considering Horsea Island, Farlington Marshes and Great Salterns for more housing.
- Concerns that the MoD will not vacate the remaining parts of Tipner as quickly or completely as planned.
- The questions in the consultation survey should link better with the consultation document published, use the same terminology and have numeric pointers to the relevant sections.

Other Comments – initial Council response:

Many of the comments raised concern environmental and ecological impacts which will require careful consideration and further work before an appropriate way forward on the sites can be finalised.

Some other comments concern issues which are too detailed to be addressed at this time but will feed into the consideration of options and opportunities as work progresses.

The comments on behalf of landowner John Pounds are noted. The Council is undertaking ongoing discussions and negotiations with other landowners in both Tipner West and Tipner East which will inform the final development strategy. Regarding specific points:

- *It is confirmed there are no current proposals to reclaim land identified to the west of the proposed new road within Area B which adjoins a working quay, and this will be made clear in further work.*
- *Further technical work on the capacity of the M275 junction is currently being undertaken. This will inform further consideration of how access to that junction will be managed, and the extent to which it might constrain development.*

Appendix 1: Consultation Questions and Index of Consultation Respondents

1	Tell us what you think of the description of the area and if you would describe it differently?
2	Tell us what you think of the main issues and challenges described in this document and if you would describe anything differently?
3	What do you think of the proposed Vision for the Tipner Strategic Development Area?
4	What do you think of the Super Peninsula concept and the potential advantages and impacts as described in this document?
5	Tell us what you think of the summary of issues to be considered in more detail. Have we missed anything? Would you describe anything differently?
6	If you have any comment on the Strategy Plan diagram at this stage, please leave them in the box below
7	Do you have any comments at this stage?
8	Do you wish to upload a document in support of your response to this consultation?

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

ID	Respondent	Question
11	I Craig	3,6
12	R Bailey	1,2,3,4,5,6
13	K Edwards	1,2,3,4,5,6,7,8
16	J Macklin	1,2,3,4,5,7
17	The Harbour School - L Taylor	1,2,3,4,5,6,7
26	Raps - C Clark	1,2,3,4,5,6
28	S Fisher	2,3,4,5,6
29	A Wright	1,2,3,4,5,6,7
30	L Gatrell	1,2,3,4,5,6,7
31	G Allibone	7
33	Butterfly Conservation - A Brookes	1,2,3,4,5,7
34	J Lloyd	1,2,3,4,5
36	Fellows International Limited - J Webb	2
37	P Lendrum	1,2,3,4,7
44	B Jackson	1,2,3,4,5
53	S Finney	1,2,3,4,5,6,7
54	K Raby	1,2,3,4,5,6,7,8
55	A Robjohns	1,3,4,7
56	M Hagan	1,2,3,4,5
60	Gordon	1,2,3,4,5
62	G Chalk	1,2,3,4,5
66	Portsmouth City Council - P Pennekett	1,2,3,4,5,6,7
69	A Croft	1,2,3,4,5
70	T Harrison	1,2,4,5,6,7
71	J Mcisaac	1,2,3,4,5,7

ID	Respondent	Question
72	R Astor	1,2,3,4
77	B Clark	1,2,3,4,5,6,7
78	J Edwin Porter	1,2,3,4,5,7
82	A Garrone	1,2,3,4,5,7
85	M Short	1,2,3,4,5,6,7
87	R Gregory	1,2,3,4
89	M Mullinger	2,3
91	M S Grayson-Smith	1,2,3,4,5,7
92	R Boyce	2,7
94	D Wildman	1,2,3,4,5,7
99	J Sewell	1,2,3,4
100	S Dorey	1,2,3,4,5,6
102	A Starr	1,2,3,4,6
103	S Dodd	1,2,3,4,5,7
104	P Tilley	2,3,,46
106	M Whittaker	1,2,3,4,5,7
109	R Treloar	1,2,3,4,5,6,7
113	M Burns	1,2,3,4,5,6,7
123	L Mason	3
124	P Twine	1,2,3,4,5,6,7
130	Ab	1,2,3,5
137	A Waugh	1,2,3,4,5,6,7
138	G Wilkerson	1,2,3,4,5,7
141	Danielle	1,2,3,4,5,6,7
143	A Mccallum	1,2,3,4,5,6,7
145	J Rowe	1,2,3,4,5,6,7
148	Melanie	1,2,3,4,5
151	M Smith	1,2,3,4,5,6,7
153	M Gottig	2,3,4,,67
154	B Clark	8
155	B Jackson	7,8
156	Environment Agency - L Lax	8
157	Fellows International - J Webb	7,8
158	Gosport Borough Council - J Grygiel	7,8
159	Historic England - M Small	2,8
160	J Chamberlain	7,8
162	J Pounds	7,8
163	The Marine Management Organisation (Mmo) -	7,8
164	Natural England - R Jones	5,8
165	P Davies	5
166	Portsmouth Cycle Forum - R Inkpen	1,2,3,4,5,6,7,8
167	Premier Marinas - P Bradshaw	1,2,3,4,5,6,7,8
168	Residents Association Of Port Solent (RAPS) - C Clark	7

ID	Respondent	Question
169	J Bamforth.	7,8
170	Rspb - T Lamour	7,8
171	Portsmouth City Council Strategic Developments And Regeneration -	1,2,3,4,5,6,7,8
172	Southern Inshore Fisheries And Conservation Authority - P Cooper	5,7,8
173	Hampshire & Isle Of Wight Wildlife Trust - T Codlin	1,2,3,4,7,8
174	M Bernard Clark	7,8
175	D Hayday	7,8
176	M & Mrs Richards	1,2,3,4,5,8
177	M S Forest	7,8
178	R Lovett	7,8
179	H Shaw	7,8
180	M S Green	7,8