

Statement of Common Ground

Portsmouth City Council & Milton Neighbourhood Forum

August 2024



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1. Introduction

This Statement of Common Ground (SCG) is a jointly agreed statement between Portsmouth City Council (PCC) and the Milton Neighbourhood Forum (MNF). It sets out the position and understanding with respect to key strategic issues between the PCC and the MNF. It is not binding on either party but sets out a clear and positive direction to inform ongoing strategy and plan making. It should be noted that this is a bilateral agreement between these two organisations only.

This SCG has been prepared in accordance with paragraph 27 of the NPPF and the section of the Planning Practice Guidance on Maintaining Effective Cooperation. It has also followed guidance prepared by the Planning Advisory Service (PAS) on this matter. It has been prepared in parallel with the Pre-Submission Local Plan (Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012). This Plan, upon adoption, will supersede the existing Portsmouth Local Plan (2012). The emerging Local Plan will cover the period to 2040 and sets out the vision, objectives and policies to guide future development in the City over the plan period.

Relation between Portsmouth City Council and the MNF

The MNF are a statutory consultee in the planning process. The MNF are a local body that led on the production of the Milton Neighbourhood Plan (MNP).

Planning Policy and national legislation

Paragraph 29 of the NPPF states that neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.

Paragraph 30 states that, once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.

Footnote 16 states that neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.

2. Key Strategic Matters

This section sets out where agreement has been reached on local matters, or where further work to reach common ground is required. It should be noted that all the figures where included relate to the plan period for the Portsmouth Local Plan of 2020-2040.

Policy STJ1 (Milton Neighbourhood Plan) and Policy PLP8 (Portsmouth Local Plan 2040)

The St James' and Langstone Campus Strategic Site falls within the boundary of the MNP area. The policy was drafted, with full consideration of Policy STJ1 of the Milton Neighbourhood Plan.

MNF agree with the approach towards the St James' aspect of Policy PLP8 within the emerging Local Plan. The emerging Local Plan takes the same approach as the MNP with regards to proposed uses within the site; retention and conservation of the heritage assets; conservation or enhancement of the parkland setting and retention of open space for future health related development.

Policy LAN1 (Milton Neighbourhood Plan) and Policy PLP8 (Portsmouth Local Plan 2040)

Policy PLP8 of the emerging Portsmouth Local Plan also had full consideration of Policy LAN1 of the MNP which focusses on the Langstone Campus part of the site.

Criterion 3(a) of Policy PLP8 of the emerging Local Plan seeks to ensure no adverse impact on the coastal landscape, in particular, by directing any development to within the existing brownfield strip, or to within land to the west of this (which is also an area outside flood zones 2 and 3). Criterion 1 of policy LAN1 of the MNP also seeks to ensure there is no adverse impact on the coastal landscape.

The supporting text (for Policy PLP8 of the emerging Local Plan) which is currently at paragraph 4.167 provides clarity on where development can occur. This paragraph is supporting text and not policy and does not supersede Policy LAN1 of the MNP. The brownfield strip is listed as the preferred location to ensure consistency with the NPPF which states at paragraph 123:

Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land

If development were to occur outside of this brownfield strip of land, PCC would not necessarily object, however, it would need to be to the west (retaining Furze Lane) and any significant loss of open space would need to be redelivered on the brownfield parcel. Whilst the wording does not replicate the MNP, it is seeking to deliver a similar approach and allow more flexibility to ensure any development would be feasible and viable.

Milton Neighbourhood Forum have proposed alternative wording below. The main change is the preferred location for further development is on the existing playing pitches and west of the existing brownfield strip. This is to ensure conformity with tables 5 and 6, of the Milton Neighbourhood Plan Habitats Regulation Assessment (April 2020)¹. This would help to enable a permeable boundary between the two parts of the Strategic Site. PCC prefer to retain the existing wording within the Regulation 19 Local Plan.

4.167 The central brownfield strip of land that was previously occupied by student halls of residence is not the preferred location for future development. New development should be directed westward to avoid the flood zone and core area for Brent Geese. Reprovision of open space should be accommodated on the previously occupied central brownfield strip to maximise opportunities for biodiversity enhancement and limit disturbance to overwintering Brent Geese.

¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/09/Milton-Neighbourhood-Plan-Habitats-Regulation-Assessment-1.pdf>

Following conversations with the MNF prior to the Pre-Submission consultation, Policy PLP8 states 'development should deliver parking standards in accordance with the Parking Standards SPD and any successor documents and Policy TSP2 (Balanced Transport Provision) of the MNP'. MNF are content with this policy approach.

Following feedback from the MNF a proposed change has been added to the Schedule of changes replacing the reference to the 'The Dog Park' to 'St James' Green.' MNF are content with this policy approach.

Policy ENV1 (Milton Neighbourhood Plan)

Policy ENV1 of the MNP sets out the designated local greenspaces within Milton. These have been replicated within figure 9.1 (The Portsmouth Green Grid including Local Green Spaces and Green Corridors) of the emerging Portsmouth Local Plan 2040 and are named in paragraph 9.120. MNF are content with this approach.

Policy PLP36: Coastal Zone and saved Policy LH2: Langstone Harbour Coastal Zone

The Policies Map for the MNP shows the Coastal Zone designated under saved Policy LH2 of the 2006 Portsmouth Local Plan. PCC have updated the boundary for the Coastal Zone in the Pre-Submission Local Plan under Policy PLP36. Following discussion with the MNF a proposed change to figure 8.6 and the Policies Map of the Local Plan has been added to the Schedule of Changes. This changes the boundary of the Coastal Zone so that it is contiguous with the boundary of Langstone Campus Field (LGS9) of the Milton Neighbourhood Plan. MNF are content with this approach.

PCC consider this not to impact the St James' and Langstone Campus Local Plan allocation policy in any way, as development would not be permitted on the eastern playing field given its flood risk, environmental importance for brent geese and designation as a Local Green Space in the Neighbourhood Plan.

Following further discussion, an additional area was added to the Coastal Zone. This is a small triangular piece of land to the north of Milton Sailing Club used for boat storage. Both parties agree with this amendment and that all of Milton Sailing Club should be in the Coastal Zone.

MNF would also like the open space bounded by Longshore Way and Broom Way and the houses on Longshore Way that front Langstone Harbour to be added to the Coastal Zone. The reasons stated are to provide consistency and join up with the Coastal Zone above. Furthermore, MNF state that Longshore Way is essentially no different in character to the Fraser Range access road where on the shore side there are low rise mobile homes and on the other a Nature Reserve. Fraser Range itself will accommodate 5-storey apartment blocks up to 16m high next to a footpath above a sea-wall. The houses in Longshore Way are not "Tall Buildings" and neither are they anywhere near 16m in height. Fraser Range is in your Coastal Zone and for the sake of consistency, so should the Broom Close Field and Longshore Way. There's a natural continuation of the open character of LGS 9 to the car park at the "Thatched House"

PCC do not agree with this approach and do not want to increase the Coastal Zone to include the above defined areas. This is because it is not open land and it is not on the coast. It would therefore not comply with the methodology used for defining the Coastal Zone in the City.

A map is included as appendix 1 of this SCG to show in detail which boundaries of the Coastal Zone are agreed with both parties and which are not.

3. Signatories

4.1 Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.

Both parties agree that they have engaged positively on an ongoing basis and that on this basis the Duty to Cooperate has been met.

Both parties agree that there are no substantial areas of disagreement between the parties relating to the emerging Portsmouth Local Plan and will both continue to work proactively on the key strategic cross boundary issues identified in this SCG.

4.0 Signatories

Signed: 	Signed: 
Name: LUCY HOWARD	Name: ROD BAILEY
Position: Head of Planning policy	Position: MILTON NEIGHBOURHOOD FORUM PLANNING GROUP
Portsmouth City Council	Milton Neighbourhood Forum
Date: 3/9/24	Date: 3rd Sept 2024

Appendix 1: Plan showing proposed Coastal Zone changes.

