

Statement of Common Ground
Portsmouth City Council as the Local Planning
Authority & Portsmouth City Council as the
Local Highways Authority

November 2024



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1. Introduction

- 1.1 This Statement of Common Ground (SCG) is a jointly agreed statement between Portsmouth City Council (PCC) as the Local Plan Authority (LPA) and PCC as the Local Highways Authority (LHA). It sets out the position and understanding with respect to key strategic issues between the LPA and the LHA. 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 parts of the City Council only.
- 1.2 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 new 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.

Role of the two Parties

- 1.3 This Statement of Common Ground (SCG) is a jointly agreed statement between PCC as the LPA and PCC as the LHA. The City Council has put handling arrangements in place to ensure:
- Functional separation between the LHA team and the LPA's team for the purposes of progressing this allocation in the emerging Portsmouth Local Plan;
 - Transparent, fair and proper policy making; and
 - The avoidance of any conflicts of interests.
- 1.4 Both parties agree to adhere to these handling arrangements in order to ensure a functional separation between the LHA and the LPA teams. However, it is acknowledged that it is necessary for there to be continued dialogue throughout the plan making process between the LPA and the LHA teams, as there would be with any other third party.
- 1.5 The LHA are a statutory consultee in the planning process. As Portsmouth is a unitary authority, the LHA operate as part of Portsmouth City Council. As the LHA, PCC have a statutory duty to maintain the public highway network in a condition that is safe for all users and to ensure efficient operation of the highway network for all users (including vehicular traffic, pedestrians, cyclists, and other users). The public highway network includes all adopted roads, footways, verges, cycle paths, bus lanes and other highway land. PCC have limited duties over roads which are not adopted (roads on private land). However, the Highways Act 1980 (s205 - *Street Works in Private Streets*) does give powers to the LHA to improve Private Roads to ensure that those roads are safe and suitable for their intended use. The Act allows for any costs incurred by the LHA to make up these roads to be apportioned between frontagers of the private road/street.

- 1.6 The LHA also has duties under the Transport Act (2000), and amendments in the Local Transport Act (2008) to formulate transport policies and publish them within a Local Transport Plan (LTP). LTPs must set out "policies for the promotion and encouragement of safe, integrated, efficient and economic transport to from and within their area" and must have particular regard for matters such as the needs of the elderly and people with mobility problems; the promotion of improvements to bus services; and promotion of the economic, social and environmental well-being of the area.
- 1.7 In developing transport policies in the LTP, the Local Transport Authority (LTA) must take account of any policies or guidance issued by the government with respect to the protection or improvement of the environment. The LHA also has a duty to keep the LTP under review and alter it as considered required/ appropriate to do so.

Planning Policy and national legislation (Transport)

- 1.8 Paragraph 20 of the NPPF states that:
"Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:"
- b) infrastructure for transport ...*
- 1.9 Section 9 of the NPPF relates to promoting sustainable transport. Paragraph 108 of the NPPF states that:
Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
- a) the potential impacts of development on transport networks can be addressed;*
- 1.10 Paragraph 110 sets out that planning policies should:
b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
- 1.11 When considering development proposals, paragraph 115 sets out that:
Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Portsmouth Context

- 1.12 As a largely island city with a historic road network, many of Portsmouth's key transport corridors have limited highway capacity and are constrained by the existing built environment. These constraints together with high levels of private vehicle use result in a number of challenges, such as traffic congestion at peak times, and air pollution exceeding legal limits in parts of the City, resulting primarily from road vehicle emissions. Improving air quality is a major strategic matter, and Portsmouth City Council has been served with Ministerial Directions requiring the Council to achieve compliance with legal limits for Nitrogen Dioxide (NO₂) in the shortest possible time in areas of exceedances.

1.13 Portsmouth City Council published the Local Transport Plan (LTP4) for Portsmouth in 2021 ([link](#)) to meet its statutory duty as the LHA to publish an up-to-date Local Transport Plan. LTP4 (also known as the Portsmouth Transport Strategy) details the Council's overarching strategy and policies for development of the transport network in Portsmouth until 2038 and was adopted on 13 October 2021. LTP4's overarching aim is that *by 2038 Portsmouth will have a people-centred, connected, travel network that prioritises walking, cycling and public transport to help deliver a safer, healthier and more prosperous city.*

1.14 LTP4 identifies that significant changes to transport in the City will be required to address key challenges such as improving air quality, reducing greenhouse gas emissions, and supporting the future growth of the city. The constraints imposed by being a heavily developed, majority island city mean that there is little to no scope to expand highway capacity significantly to meet future demand growth. In response to this context, the four key strategic objectives identified in LTP4 are to:

- Deliver cleaner air
- Prioritise walking and cycling
- Transform public transport
- Support business and protect our assets

1.15 Many policies strongly prioritise actions to enable increased uptake of sustainable travel modes such as cycling, walking and public transport, in order to address issues stemming from high levels of vehicle use (such as poor air quality and inefficient land use) as well as making better use of limited highway space in many parts of the City, to help increase overall capacity for movement of people (rather than vehicles). The policies also recognise that for some journeys, vehicle use will remain essential, and that key economic drivers such as the port/ naval dockyard and visitor economy are dependent on an efficient and reliable transport network.

2. Key Strategic Matters

2.1 This section sets out where agreement has been reached on strategic 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.

Housing Need	Housing Supply	Unmet need
17,980 (899 dpa)	13,603 (680 dpa)	4,376 (219)

Employment Need	Employment Supply	Unmet need
42,500	Office 77,099	0
96,300	B2/ B8 / R&D 79,784	16,516

Portsmouth Strategic Transport Assessment

2.2 Portsmouth commissioned SYSTRA to undertake a Strategic Transport Assessment (STA) to support the Local Plan at Regulation 19. The key objectives of the Transport Assessment include the following:

- **Evaluate the impact of the strategic sites and site allocations** on the surrounding transport network, covering public transport, active and vehicular modes. This considers impacts at both a local and a strategic scale.

o **Identify any mitigation measures required** to support the levels of targeted growth as well as avoiding detriment to the environment and local communities. The mitigation schemes factor safety as a key consideration for any scheme design.

- 2.3 Mitigation schemes have been developed for specific locations where Local Plan development vehicle traffic impacts were forecast via modelling when compared to a future baseline of highway performance, whilst applying a sustainable transport hierarchy to scheme development. The strategic model used will re-mode trips to the most equitable mode, however the modelling has only focused on interventions at specific "hotspots" and stopped short of testing the impact of realising a quantum of mode shift from delivery of more widely spread schemes/strategies identified in LTP4.
- 2.4 SYSTRA consulted closely with the Council to determine a list of committed land use and highway schemes for inclusion in the SRTM model runs. A breakdown of the schemes which are included within the SRTM can be found in **Appendix B** of the STA. This includes schemes within Portsmouth and those in adjacent boroughs. Drawings of relevant highway schemes in Portsmouth that are included in the SRTM network can be found in **Appendix C**.
- 2.5 Delivery of wider, uncommitted schemes/strategies will in many cases be largely dependent on external funding, some of which could be sourced through planning obligations for new development. Without the exact parameters of how these schemes would operate and the expected benefit they would bring, they could not be included within the STA.
- 2.6 The LHA have been involved throughout the process of preparing the Strategic Transport Assessment and support the mitigation measures proposed on the Local Road Network. The only mitigation arrangement that the LHA does not currently fully support is that of Portsmouth City Centre which will be discussed below.

Portsmouth City Centre Road Scheme

- 2.7 The Portsmouth City Centre Road (CCR) project is part of the wider long-term vision for reimagining the City Centre area as part of the City Centre Masterplan and 2040 Development Strategy. It revises the highway network on the western corridor of Portsmouth to maximise the development potential of the site to fully deliver the proposed City Centre North Scheme. In line with the Local Plan, this site supports the development of brownfield sites, generating opportunity for City Centre regeneration and promoting the growth and enhancement of sustainable travel within the City Centre.
- 2.8 A planning application for the City Centre North site, comprising up to 2,300 residential units and complementary non-residential development was submitted in August 2022 and subsequently approved in October 2023. Acknowledging that there are limited strategic options to maximising the development at this site, a key enabler to the viability of this site is the realignment of the road network.
- 2.9 Due to some significant differences in the expected demand for private car trips used, and assumptions made related to future mode-shift as a result of future policy initiatives set out in LTP4, the results from the project level Transport Assessment (TA) and Local Plan Strategic Transport Assessment (STA) differ, with the STA forecasting a more heavily congested highway network than was projected in the supporting TA for the City Centre North planning application.

2.10 The major differences between the City Centre North Planning Application modelling and the STA modelling were that the Planning Application modelling included assumptions around:

- lower levels of car availability amongst residents of the City Centre North development site
- inclusion of the proposed expanded Tipner Transport Hub (P&R) site, and
- mode shift assumptions based on achievement of Portsmouth Transport Strategy (Local Transport Plan (LTP4)) policies. These assumptions are briefly summarised in the footnote¹.

2.11 To represent a robust modelling assessment these assumptions have not been modelled in the Local Plan modelling. This modelling exercise only factored in committed highway schemes.

2.12 The Planning Application TA demonstrated some significant network stress in some areas of the revised highway network; however, the incidences and severity of the impact is greater still in the STA modelling outputs.

2.13 The STA provides detail on the different assumptions used during the two modelling processes and the reasoning behind these. There is an aim, consistent with the aims of LTP4, to deliver modal shift which sees people within the City Centre allocation (and across Portsmouth as a whole) moving out of their private cars and using active modes and public transport, where possible. The CCR Planning Application TA modelling forecasts assumed achievement of these outcomes more widely and to a greater extent than the Local Plan STA did, beyond what current committed schemes are expected to achieve.

2.14 The proposed City Centre Road layout within the STA would support greater public transport and active travel connectivity and provide routes/lanes for these modes that are separated from general motor traffic in several areas. However, the LHA is concerned that the road scheme as designed, and with the predicted number of vehicle trips utilising the network as forecast in the STA, would result in severe delays to all traffic and subsequent congestion. Such levels of congestion may also result in an unacceptable safety risk at a number of junctions surrounding the City Centre allocation site. Following results from the Local Plan Air Quality Assessment, it is also apparent that this level of traffic would have a detrimental impact on air quality.

¹ The CCR Planning Application Modelling included a set of conservative assumptions around mode shift that would result through delivery of policies in the Portsmouth Transport Strategy. This modelling assumed that the expanded Tipner Park and Ride would result in 1.5% of trips travelling southward from the M275 into the city centre diverting into the Park and Ride instead. And it assumed that Portsmouth Transport Strategy Policies would deliver network-wide reductions in vehicular demand of 5% in the 2026 model year, and 9% in the 2038 model year. Full details on these assumptions are available in Section 3/ Table 3.3 of the Transport Assessment supporting the Portsmouth City Centre North Outline Planning Application (link to document: https://publicaccess.portsmouth.gov.uk/online-applications/files/35D209F1A417BAFA46E278AD064CCD0B/pdf/22_01243_CS3-PCCN_ESVOL3_APPENDIX_TRANSPORT_PART1-2430464.pdf)

- 2.15 The CCR Planning Application modelling, which included estimated mode shift arising from wider achievement of LTP4 policies and strategies (as well as a significant reduction in vehicle trip generation at the city centre development site, which would need to be achieved through demand management/mode shift measures) may indicate that achievement of these policies and strategies could help to address some of these concerns. Achieving these policies and strategies will be dependent on securing significant external funding to allow their delivery. Despite these unfunded and uncommitted schemes not being included within the STA, they have been highlighted as 'critical' schemes within the IDP in order to unlock the growth of the City Centre.
- 2.16 Following the initial results from the STA, the CCR Project team, the LPA, LHA and air quality teams created a working group. This group has commissioned tests of minor alterations to the proposed road layout that could be used at both project level and as part of the STA and which could operate more efficiently and ensure an acceptable forecast level of air quality. Concerns around performance of the proposed highway network around city centre north and the impact of this on air quality within the City Centre remains the only outstanding comment within the LHA Regulation 19 response.
- 2.17 PCC LPA will continue to work with both the LHA and the CCR project team on any further modelling and/or design work that is required in order to modify the CCR scheme in order that traffic impacts are minimised and air quality impacts are acceptable. The LHA support this approach. The LHA will also continue to work with LPA and other partners to seek external funding to deliver wider transport policy/strategy mitigation measures as set out in LTP4.

Tipner Transport Hub

- 2.18 Development of the existing Tipner Park and Ride to create an expanded Transport Hub is a key transport intervention identified in Policy D of the Portsmouth Transport Strategy (LTP4), Policy A of the Portsmouth Parking Strategy, and the Pre-Submission Local Plan (Strategic Site Allocation Policy PLP4).
- 2.19 Park and Ride is a tool which supports PCC in addressing the root cause of air quality issues (high traffic volumes and congestion) by removing vehicles from the network before they pass through the most sensitive parts of the network, i.e. the City Centre and Clean Air Zone. Therefore, Policy D of the Portsmouth Transport Strategy ("Expand the Portsmouth Park & Ride to create a transport hub, to reduce pollution and congestion in the city and increase transport choices") sits under the Strategic Objective of "deliver cleaner air" reflecting the importance of this scheme to supporting air quality improvements in the city.
- 2.20 An equally important objective of the Tipner Transport Hub scheme is to support regeneration of the City Centre area and development of new activity at Portsmouth International Port through provision of significantly expanded, flexible, edge-of-city vehicle parking space for a range of uses which support various aspects of the City's transport strategy and wider development plans.
- 2.21 The regeneration of the City Centre includes plans to convert some existing parking capacity in the City Centre to other uses, from the mid/late 2020s to the late 2030s. The Transport Hub scheme is intended to re-provide parking capacity at the Tipner site, at the edge of the city, intercepting traffic to destinations such as the City Centre, University and Gunwharf Quays and re-moding it to sustainable modes for the "last mile" into the City Centre. Other potential/ expected uses for the Transport Hub scheme include:

- Supporting car free "last mile" journeys to key / seasonal destinations not currently linked to the Park and Ride, such as Portsmouth Football Club, NHS sites, Southsea seafront and for seasonal events
- Supporting continued growth of Portsmouth International Port: the Port Masterplan states that it is expected that the port will utilise the Transport Hub site to provide additional off-site parking for ferry/cruise services commencing between year 2 (2024) and year 4 (2026) of the masterplan period
- Mitigating the impacts of construction of the City Centre Road scheme (currently anticipated between 2026/27 and ~2031)

2.22 The LHA/LTA view the Tipner Transport Hub scheme as necessary to support the aims of the Local Transport Plan 4 and support regeneration of the City Centre both during construction (e.g. to support efforts to mitigate impacts of the city centre road scheme) and in the long term. The need for the Tipner Transport Hub scheme is anticipated to come into effect between 2025 and 2030 and to grow through the 2030s.

2.23 The role of this site as a tool for managing the impacts of external traffic growth into the City is also expected to grow in the future linked to development strategies and population growth in neighbouring authorities. The Government consulted over the summer of 2024 on a revised standard methodology for calculating housing need. That increased the statistical need for housing in the sub-region considerably, for example, need in Portsmouth increased from 897 dwellings per annum to 1,098 whilst need in Fareham grew from 498 to 794 dwellings per annum. This is a level of growth in surrounding areas which exceeds that considered in recent forecasting exercises (e.g. Local Plan Strategic Transport Assessment) and may further increase the importance of Tipner Transport Hub as a tool to manage the impacts of this external growth on the City.

2.24 There have been discussions between the LHA/LTA and LPA regarding whether there is potential for Tipner Park & Ride/Transport Hub to provide some parking for the neighbouring developments proposed for both Tipner East and Tipner West & Horsea Island East.

2.25 The allocation of parking spaces at the Tipner Transport Hub for private vehicle parking associated with Tipner East and Tipner & Horsea Island East is not supported by adopted Portsmouth City Council transport policies. This is in line with the policy position of the adopted Local Transport Plan 4 and the Portsmouth Parking Strategy, the interdependency of the Tipner Transport Hub with larger strategic development sites in the City Centre and the importance of Park and Ride/Tipner Transport Hub as a measure to address air quality issues in the City Centre.

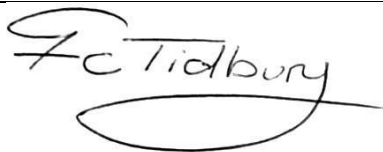
2.26 Any allocation of parking spaces within the Tipner Park & Ride/ Transport Hub for the parking of vehicles associated with the adjacent developments would need to be balanced against the fact this could place a constraint on the Transport Hub scheme's ability to support other council priorities, particularly:

- Successful delivery of the City Centre Strategic Allocation, which is planned to deliver twice as many homes as will come forward on the Tipner peninsula.
- Managing impacts of growth outside the City, on the city's highway network
- Improving Air Quality.

2.27 These are all evolving matters and ones which the LHA/LTA will remain in dialogue with the LPA over. However, the LHA/LTA anticipate that the role of the Transport Hub in facilitating City Centre regeneration and further commercial development of the Portsmouth International Port, and in supporting management of external traffic growth upon the City's network, is the long-term strategic priority of the City Council.

3. Signatories

- 3.1 Both parties agree that this statement is an accurate representation of matters discussed, and issues agreed upon.
- 3.2 Both parties agree that they have engaged positively on an ongoing basis and that on this basis the Duty to Cooperate has been met.
- 3.3 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.

Signed:	Signed:
	
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Date: 26/11/24	Date: 22/11/2024