

Statement of Common Ground
Portsmouth City Council (LPA) & Portsmouth
City Council (Public Health)

February 2025



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 Public Health (PH) as the Authority responsible for health and wellbeing as set out under the Health and Social Care Act 2012. The SCG sets out the position and understanding with respect to key strategic issues between the LPA and the PH. 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 National Planning Policy Framework (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 SCG is a jointly agreed statement between PCC as the LPA and PCC PH. The City Council has put handling arrangements in place to ensure:
- Functional separation between the PH team and the LPA's team for the purposes of progressing 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 PH 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 PH teams, as there would be with any other third party.
- 1.5 PH is an internal consultee in the planning process. As Portsmouth is a unitary authority, PH operates as part of PCC. PH is responsible for the main statutory duties for public health conferred on local authorities by the Health and Social Care Act 2012.
- 1.6 Local authorities have, since 1 April 2013, been responsible for improving the health of their local population and for public health services. The Secretary of State continues to have overall responsibility for improving health – with national public health functions delegated to the Office for Health Improvement and Disparities (OHID) and the UK Health Security Agency (UKHSA).
- 1.7 Factors such as education, employment, environment, transport, planning, housing, and leisure services are crucial determinants of people's physical and mental wellbeing and impact on their life expectancy. In addition to having a general duty to improve local public health, the team work across the Council to ensure services understand

how their areas impact the health of residents. The Portsmouth Public Health Strategy¹ sets out a thematic approach to improving health and wellbeing in the City, in which the directorate commits to: understand the health and wellbeing of our local population through strategic intelligence and analytics; protect the health and wellbeing of our local population; prevent ill-health by mitigating impacts of root causes and helping local residents live in good health and improve health and wellbeing for all our communities fairly through addressing, slowing or preventing progression of disease and supporting all population groups.

1.8 This SCG has been prepared in response to the comments received from PH on the regulation 19 Local Plan (July 24). In addition, other matters arising from discussion between the LPA and PH post the pre-submission consultation are also addressed.

1.9 This SCG deals with outstanding points of contention and points where additional clarification on outstanding issues is required. The SCG also addresses ongoing joint work being proposed and undertaken by PH and the LPA in order to improve the health outcomes of the City.

1.10 Points raised by PH in the regulation 19 consultation on the local Plan which have been addressed through the Schedule of Changes to the satisfaction of PH and the LPA are not specifically addressed in this SCG, Both parties agree that these points have been satisfied.

2. Key Matters

Climate Emergency

2.1 PH is pleased to see that responding to the climate emergency has been put at the heart of the Local Plan as a core policy. Climate resilience is recognised by PH and the LPA as of increasing importance to the future health and wellbeing of the City and its residents. There is a need to think beyond 2040 in terms of climate resilience; what we put in place now in terms of development and green and blue infrastructure must be as future-proof as possible for an increasingly extreme climate not just in 2025-2040, but in the decades thereafter. PH and the LPA will work together on as part of a One Council approach on future strategies on climate resilience and greening to improve Portsmouth's resilience to climate change. Future iterations of the Local Plan including future core policies on design will reflect these emerging strategies to better understand and recognise this threat to human health and the wellbeing of our residents and City.

Green Corridors rationale

2.2 The PH team would like to see further detail provided in addition to that set out currently to clarify the rationale for the choice of the locations of the Green Corridors as set out in Policy PLP 38. The supporting position for the Green Corridors is currently set out

¹ <https://democracy.portsmouth.gov.uk/documents/s48586/Public%20Health%20Strategy%202023-2026%20-%20Appendix%201.pdf>

in the Biodiversity Background Paper (July 2021)² and Green Infrastructure Background Paper (July 2021)³. The LPA and PH agree that although these papers show the location of the proposed Green Corridors and explain the broad intention behind them, they do not go into detail on why the green specific Green Corridors were chosen in lieu of other routes in the City.

- 2.3 PH and the LPA have agreed that further detail will be provided to explain the rationale for the choice of Green Corridors as an addendum to the Biodiversity and Green Infrastructure Background Papers, which will be published shortly after Submission of the Local Plan.

Tree Canopy Cover changes including timing and Cavat

- 2.4 Following comment on the Regulation 19 Plan by PH and the Council's Tree Officer on the need to include a timeframe in respect of the tree canopy cover target, the Local Plan Schedule of Changes was updated by the LPA to include an ambitious five year time period for the tree canopy cover target as set out in policy PLP35. Further discussion between the LPA and PH has led to the conclusion that this would be difficult to meet in the City given the urban nature of sites. PH have suggested that an extended target date of 20 years would give increased leeway and be more realistic to achieve. A revised date of 20 years will therefore be added to the new additional schedule of changes being prepared by the LPA.

- 2.5 PH asked at regulation 19 stage for policy PLP41 to include reference to CAVAT Values. The LPA felt that it would be too difficult to include a CAVAT approach in the policy at this late stage as it not an approach that had been consulted upon at either regulation 18 or regulation 19 stage. While accepting this, PH felt that the inclusion of CAVAT Values is something that should be included as an ambition in future reviews of the local Plan. PH and the LPA agreed to work together to include CAVAT as part of future development standards for the Council, in future iterations of the Local Plan and strategy being developed by PH as appropriate.

Offsite open space provision

- 2.6 In the regulation 19 consultation PH suggested that, while onsite provision remains the preferred approach, development would in many instances struggle to realistically deliver the full 1.65ha per 1,000 people target as suggested in Policy PLP 45 onsite. The Policy allows for offsite improvements to existing open space in lieu of onsite provision, an approach with which PH agrees. This follows a similar approach to that

² https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Biodiversity-Background-Paper-Updated-2021_compressed.pdf

³ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Green-Infrastructure-background-paper-Sep21_compressed.pdf

currently pragmatically applied to the existing Portsmouth City Local Plan Policy PCS134.

- 2.7 Currently offsite improvements are agreed as required between the Planning and other Council departments (mainly the Parks team in Culture and Leisure) dependent upon the scale of the development, the proximity of a suitable open space for provision for offsetting and the need for that space.
- 2.8 PH suggest that it would be beneficial for the LPA to work with colleagues responsible for greening within PH to develop a specific process for the delivery off offsite open space mitigation in order to ensure that contributions are being targeted to the most appropriate locations and needs. PH envisage that this would replace the current ad hoc approach, though it would retain sufficient flexibility to allow for individual site circumstances.

AMR indicators

- 2.9 The PH team have indicated that it would be useful to revisit the indicators that are being considered in the Council's Authority Monitoring Report (AMR) in order to ascertain if there is potential to capture data that would be useful for monitoring the wider health, sustainability and climate resilience, including green infrastructure and nature-based solutions agenda. The LPA team and PH will work together to ascertain if there are any additional indicators that should be added to the monitoring chapter of the next version of Local Plan which will then be monitored through subsequent AMRs in order to capture such data. This will be subject to investigation to determine the availability of data and the practicality of collecting it as part of the AMR process.

City Centre Air Quality

- 2.10 PH made comments in partnership with PCC's Transport team in respect of para 4.98 and Policy PLP6 in respect of Air Quality in the City Centre. The LPA has agreed the inclusion of the following wording as an additional paragraph after para 4.98 with the LHA as part of the SoCG between the two functions of the Council: *'To help address Air Quality issues, the importance of prioritising sustainable modes of travel into the City Centre from across the City and beyond, through a wide range of measures to secure modal shift and reduce traffic volumes in the City Centre area in order to mitigate against poor air quality.'* PH are also in agreement that this wording is appropriate.

Limiting Takeaway's in the City

- 2.11 To address the issue of both childhood and adult obesity in the City, PH is keen to limit the number of hot food takeaways and fast-food outlets in the proximity of schools. The Local Plan does not specifically address this issue as it was drafted in line with the 2023 version of the NPPF. The most recent NPPF (December 2024) addresses hot food takeaways and proposes limitations to their proliferation in the proximity of schools and places where young people congregate. Paragraph 97 of the NPPF (2024) states that: Local planning authorities should refuse applications for hot food takeaways and fast-food outlets:

⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/The-Portsmouth-Plan.pdf>

- a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or
- b) in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social behaviour.

2.12 A position statement in line with the new NPPF will be prepared by the LPA in liaison with PH as evidence to support of the next version of the Local Plan. It is envisaged that the next version of the Local Plan will be prepared in line with the NPPF guidance and this local position statement, and that the LPA will continue to work closely with PH to create policy that reflects the revised NPPF and incorporates local nuance. This will help to tackle issues of obesity in the City and promote the health of residents. The future planning policy approach will be complemented by wider public health initiatives to tackle obesity in the City.

Health Impact Assessment

2.13 The PH team raised the issue of the quality of Health Impact Assessments being submitted as part of planning applications. It was agreed that PH would talk to the Development Management (DM) team within the LPA to discuss a robust, systematic approach to Health Impact Assessments. PH may produce guidance for DM colleagues to support the delivery of good quality HIA by applicants.

Reference to World Health Organisation Guidance on Air Quality

2.14 As part of their Regulation 19 response, PH requested that the LPA make reference to the World Health Organisation global air quality guidelines (2021) which address the significant environmental and public health risk of air pollution and set out lower target levels of air pollution than are deemed legal under UK regulation. According to the UK's Chief Medical Officer, 'Air pollution affects us all. It is associated with impacts on lung development in children, heart disease, stroke, cancer, exacerbation of asthma and increased mortality, among other health effects.' (CMO, Annual Report 2022: Air Pollution). The Schedule of changes currently proposes the following updated wording (Local Plan para 8.80) to accommodate this: *The World Health Organisation's new Global Air Quality Guidelines emphasise that no safe level of air pollution exists, and that improving air quality can achieve substantial health benefits for people everywhere.* Following further discussions with the PH team they feel that a change of emphasis is required and suggest the wording should read: *'The World Health Organisation global air quality guidelines (2021) state that there is no evidence for a safe level of air pollution. In the revised guideline, WHO's annual average targets were reduced from 10 to 5 µg/m³ for fine particulate matter (PM_{2.5}) and 40 to 10 µg/m³ for NO₂. Increased understanding and growing awareness of the threat to health posed by air pollution is likely to lead to a reduction of the legal levels in the UK in line with WHO guidance'* To further protect the health and wellbeing of the City's residents, PH would like to continue to work with the LPA to ensure that planning policy pays due regard to evidence-based guidance on air quality and aligns with the refreshed PCC Air Quality / Clean Air Strategy (currently in development).

Ongoing Future Cooperative working

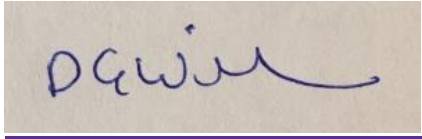
2.15 The LPA and PH will continue to work together to promote Health in the City and to ensure that future policy puts the health and greening agendas central to its approach.

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: _____
Name: Lucy Howard	Name: Daniel Williams
Position: Planning Policy Manager	Position: Public Health Principal
Portsmouth City Council	Portsmouth City Council
Date: 27.02.25	Date: 27.02.25