

Statement of Common Ground

Portsmouth City Council & Historic England

2025



Portsmouth
CITY COUNCIL



Historic England

1. Introduction

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

This SCG has been prepared in accordance with paragraph 27 of the National Planning Policy Framework (2023) (NPPF) and the section of Planning Practice Guidance relating to Maintaining Effective Cooperation.

The following documents form appendices to the SCG:

- Appendix A - Letter titled from HE to PCC 'Informal engagement on emerging Portsmouth Local Plan (PLP)' (12/01/24)
- Appendix B - Historic England's Representation on the Regulation 19 Pre-submission Portsmouth Local Plan (03/09/24)
- Appendix C - Table setting out PCC's Response to Historic England's Regulation 19 Representation
- Appendix D - e-mail correspondence between PCC and HE (08/11/24, 22/11/24 and 28/11/24)

2. Relations between Portsmouth City Council and the Statutory undertaker

HE is the Government's statutory advisor on the historic environment. Central to their role is advising on development proposals affecting the historic environment. They also engage with Local Planning Authorities, including Portsmouth City Council, to make well informed and effective local plans by advising on emerging policies and/or site allocations.

Portsmouth City Council is the local Planning Authority for the City of Portsmouth. HE is named as a specific consultation body in PCC's Statement of Community Involvement.

Pre-Submission Portsmouth Local Plan Reg 19 consultation

As a specific Consultation Body, HE was formally consulted on the Pre-Submission Local Plan by the City Council. Both parties agree that there has been considerable and positive engagement between them in relation to the preparation of the City's emerging Local Plan.

On 2 January 2024, PCC shared draft material from the Pre-Submission version of the Local Plan with HE in relation to the following policies:

- PLP3: Tipner West & Horsea Island East
- PLP4: Tipner East
- PLP6: Portsmouth City Centre
- PLP8: St James' & Langstone Campus
- PLP30: Cultural and Visitor Economy
- PLP53: Historic Environment
- PLP54: Listed Buildings
- PLP55: Conservation Areas
- PLP56: Archaeology

HE provided comments by 12 January 2024 as requested and proposed a number of changes in a letter (appendix A). With the exception of a relatively limited number of issues,

PCC made all of the changes proposed by HE to the wording of policies relating to heritage/the historic environment in the draft Pre-Submission Reg 19 Portsmouth Local Plan.

HE then provided a subsequent further detailed representation (appendix B). This was followed up with meetings held between both parties on the 12th and 13th September 2024 to further consider and discuss the comments.

PCC reviewed the representation and provided a carefully considered and lengthy response, (appendix C) to the comments/ amendments to Plan suggested by HE. This formed the basis of further discussion in a subsequent meeting between the two parties on 8th November 2024.

Other Engagement

In addition to the discussion, emails and meetings between PCC and HE (summarised above), that have taken place since late 2023, at the invitation of the Council, HE has been a member of the Tipner West Regulatory Panel and participated in Panel meetings, which has included local plan matters related to policy PLP3 on Tipner West and Horsea Island East. HE also engaged in discussions related to a proposed SCG specifically for this site, which (for HE's interests) has been subsumed into this SCG.

Furthermore, HE met PCC to discuss its emerging Heritage Strategy on 9 February 2024 and offered some follow-up comments via email.

HE has also coordinated two visits of a Historic Places Panel to Portsmouth, hosted by PCC: first on 22 and 23 February 2023; a return visit took place on 14 November 2024.

3. Key Strategic Matters

The two parties have found agreement across a wide range of points raised in relation to conservation and heritage matters within the Pre-submission plan, notwithstanding this, there nevertheless remain a limited number of outstanding areas between them. These are considered in more detail below:

Following the parties meeting and discussions on the 8th of November, HE articulated the following points via e-mail:

- They support the suite of heritage policies in the Pre-Submission Portsmouth Local Plan and commend the Council for its work to strengthen its heritage policy in the Local Plan. This is a significant improvement from the Regulation 18 version of the Local Plan.
- They support the Council's commitment to building retention, expressed through policies PLP2, PLP33 and PLP53.
- They welcome the LPA's proposed changes to the following policies: PLP10, PLP11, PLP13 and PLP14, addressing the soundness concerns that were raised about such policies during the Regulation 19 consultation.

Notwithstanding these positive points, they also stated that they retained concerns in relation to policies:

PLP1: Design (in particular criterion 7 relating to tall buildings),

PLP3: Tipner West & Horsea Island East, and

PLP6: Portsmouth City Centre (with an emphasis on the Commercial Area of the Centre).

It is these points which form the focus of this Statement hereafter.

Policy PLP1: Design (tall buildings only): Not yet fully resolved

In their Regulation 19 response, HE deemed Policy PLP1: Design unsound for a number of reasons. Please see Appendix B of this SCG for more detail. PCC agreed to make several of the amendments suggested (detailed in Appendix C). However, a single area of outstanding disagreement between the two parties relates to tall buildings (criterion 7 of Policy PLP1).

In their Regulation 19 response, HE proposed an additional sub-criterion (d) to PLP 1 (7) to address their concerns about the need for design excellence and highlight parts of the city in Areas of Opportunity that are especially sensitive:

7. Development proposals for a tall building(s) will be assessed against the following criteria:.....

d) Excellence in design for tall buildings is of paramount importance, informed by a heritage statement and landscape and visual impact assessment. The Hard, close to the historic dockyard, Tipner West and Port Solent are especially sensitive locations.

PCC provided a detailed response (available in Appendix C) explaining why it deemed it neither necessary nor appropriate to accept the addition of the proposed new criterion.

In order to reach a point of common ground, HE suggested an alternative, briefer possible wording to the new sub-criterion as follows:

7. Development proposals for a tall building(s) will be assessed against the following criteria:...

d) The highest standards of architectural quality are required."

Upon review, and further to discussions with HE, PCC consider that it is justified to maintain a 'parity of esteem' in policy terms in relation to seeking high quality design for all proposals. In light of this, the following amendment to the wording of the policy was proposed by the LPA:

"7. Development proposals for a tall building(s) must be of a high architectural quality and will be assessed against the following criteria..."

HE welcomed the proposed wording and accepted the LPA's suggested change. HE noted that tall buildings have the potential to have a greater impact (for positive or negative, as acknowledged in paragraph 3.45) due to their scale, and they maintain the value in emphasising the importance of quality in their design, a position which the LPA agrees with.

HE raised issue with the robustness of the evidence base supporting the Areas of Opportunity at Tipner West and Port Solent. The City Council considers it has addressed the matter robustly (in Appendix C of this document), HE and PCC agree that the Tall Buildings Study should be reviewed and updated as part of the review of the Local Plan.

Finally, HE also asserted that the plan should make clear how PCC would assess proposals for tall buildings. In their Regulation 19 response, HE suggested policy PLP3 make this clear. PCC responded that for a number of reasons this was not necessary or appropriate (see Appendix C). Following further discussions, in its email of 28 November 2024, HE put forward an alternative solution: That the LPA should expand footnote 35 in the Pre-submission Portsmouth Local Plan as follows:

“In order to assess the suitability of proposals for new or replacement tall buildings, the applicant will be required to submit a Tall Buildings Statement, which should satisfactorily respond to all criteria in its Tall Buildings SPD (or future equivalent):

<https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-buildings-tall-buildings-spd.pdf>”. As the LPA's response in Appendix C makes clear it

requires applicants to submit a Tall Buildings Statement as part of their 'Local List' submission requirements - this will remain the case, irrespective of whether there is an additional requirement in the Plan to do so or not.

Notwithstanding this, The LPA acknowledge that HE consider the absence of a change to footnote 35 (to require the submission of a tall buildings statement in the plan) to be an outstanding matter of disagreement between the two parties..

Policy PLP3: Tipner and Horsea Island East: All matters resolved

In their Regulation 19 response, HE deemed Policy PLP3: Tipner West and Horsea Island East unsound for a number of reasons. Please see Appendix B of this SCG for detail. PCC agreed to accept a number of the amendments suggested (detailed in Appendix C). An area of outstanding concern from HE related to the scouring effect on the designated D-Day Slipways; a potential consequence of land reclamation and flood defence measures proposed in the allocation. HE suggested an amendment to criterion o) of the policy to reference hydrodynamic modelling to address their concerns:

“o) Future development of the site will require land raising and construction of flood defences. Their implementation should be informed by the SFRA Level 1 and 2 and hydrodynamic modelling to ensure changes in water flow do not result in scouring of the Scheduled slipways;”

In response, PCC proposed the following alternative amendment to the supporting text (paragraph 4.27 of the Pre-Submission Portsmouth Local Plan), rather than to the wording of the policy itself:

“..... This should be informed by the SFRA level 1 and 2 and must incorporate detailed site specific wave overtopping calculations along with suitable calculations for freeboard. Regard should also be had to the potential impact of any new flood defences on the nearby designated D-day slipways, through scouring caused by the funneling of water. Addressing this may require further investigation through coastal hydrodynamic modelling to better understand potential water behaviour scenarios, and their impacts on coastal structures and options for erosion management.”

Following review, HE welcomed the acknowledgement of the need for hydrodynamic modelling, but still retained concerns as follows:

- HE asserted that such hydrodynamic modelling will be required, as opposed to 'may.'
- HE suggested that, for completeness, 'land reclamation and bridge design' should also be acknowledged as having a potential scouring effect on the designated D-day slipways.
- HE also proposed that 'impacts should be mitigated by design' be added to the proposed new wording for paragraph 4.27.
- HE asserted that a high level hook for hydrodynamic modelling in the policy (criterion o) itself is merited.

Upon review, PCC agreed to accept the addition of 'land reclamation and bridge design' to the additional text proposed for paragraph 4.27. PCC also agreed to replace 'may' with 'will'

in the paragraph. PCC however did not deem it necessary to add 'Impacts should be mitigated by design' to paragraph 4.27 as this requirement would be addressed at the application stage under the very detailed new Design Policy (PLP1). As previously discussed and noted in PCC's initial response (Appendix C), it is also necessary that the Plan and its policies are read, interpreted and responded to holistically.

In regards to the proposed addition to criterion 2 (o) of Policy PLP3, PCC consider that the changed wording to paragraph 4.27 is sufficient to address the need for hydrodynamic modelling; the change from 'may' to 'will' is also considered to reinforce this.

In response, HE indicated that they accept the compromised position outlined above by PCC. The final, proposed amendment to paragraph 4.27 is as follows:

"4.27..... This should be informed by the SFRA level 1 and 2 and must incorporate detailed site specific wave overtopping calculations along with suitable calculations for freeboard. Regard should also be had to the potential impact of any new flood defences, land reclamation and bridge design on the nearby designated D-day slipways, through scouring caused by the funneling of water. Addressing this will ~~may~~ require further investigation through coastal hydrodynamic modelling to better understand potential water behaviour scenarios, and their impacts on coastal structures, options for erosion management and other appropriate mitigation measures."

HE indicated that they have no outstanding concerns regarding the revised wording to the second half of criterion PLP3 2b (new criterion proposed in their Regulation 19 response), on implementing the following agreed wording (which reflects the exchanges discussed in Appendix D):

"2...b) Break down the barriers, both physical and perceived, created by the M275 motorway and Portsbridge Creek. This will be achieved through the design of both buildings and spaces to create excellent connections with new development at Tipner East and the wider area.
[insert break]

~~c) The Deliver a~~ design, scale and massing ~~that of the scheme needs to~~ responds sensitively to the significance of Portchester Castle including its setting, taking into account its presence dominance in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance;"

In conclusion, implementing matters as detailed above, all concerns raised by HE in regards to Policy PLP3 have been addressed to their satisfaction, and in consequence, there remain no unresolved matters between PCC and HE in relation to this particular policy.

Policy PLP6: Portsmouth City Centre (City Centre Commercial Area): Not yet resolved

In their Regulation 19 response, HE deemed Policy PLP6: Portsmouth City Centre unsound for a number of reasons. Please see Appendix B of this SCG for detail. PCC agreed to accept the majority of the amendments proposed (detailed in Appendix C). However, an area of outstanding concern for HE relates to the City Centre Commercial Area associated with Policy PLP6 (criterion 4). HE highlighted that they believed consideration of the heritage/historic significance of the City Centre Commercial Area was absent, whereas it is

acknowledged in the policy criteria associated with other sub areas of the City Centre identified in the same policy (figure 4.5 in the Pre-Submission Portsmouth Local Plan).

Upon initial review, PCC deemed it unnecessary to make any amendments, as any potential impacts on heritage assets would be addressed at the planning application stage. However, following subsequent discussions with HE and further review, PCC agreed that consideration of the heritage/historic significance of the City Centre Commercial Area could be further acknowledged. In response to this, PCC proposed the following amendment to criterion 4 of Policy PLP6:

4. "Proposals falling within the City Centre Commercial Area (as shown in figure 4.5) should include town centre uses at ground floor level. Proposals which retain and enhance active frontages in this area including outside / street seating will be supported. Outside of the commercial frontages schemes that deliver high-density mixed-use development will be permitted provided they improve connectivity between the retail area, and the surrounding areas and contribute to a modal shift to sustainable transport. Proposals within this area should provide space to accommodate and avoid negative impact on the markets which use Commercial Road. Interventions at the Arundel Street Focal Point should protect and enhance the fountain and take opportunities to utilise the space for cultural events. Development proposals within the area should also avoid unacceptable harm to the significance of designated heritage assets within the area."

The following amendment(s) have also been proposed by the LPA to the supporting text (paragraph 4.111):

4.111 "Within the City Centre Commercial Area there are ~~two listed buildings namely St Agatha's and All Saints Churches~~ four Grade II listed buildings (105 Commercial Road, 116/118 Commercial Road, Trafalgar House and Connaught Drill Hall), and a range of other handsome buildings and features of interest. Proposals for redevelopment within this area must retain these buildings and respond sympathetically to their settings. The southern portion of the area borders the Guildhall & Victoria Park Conservation Area and proposals on adjoining sites should respond sympathetically to the park and the Cathedral."

Upon review, HE expressed disappointment in relation to the proposed wording. They believe that it does little to conserve or enhance the value of the area's historic environment (see appendix D for detail).

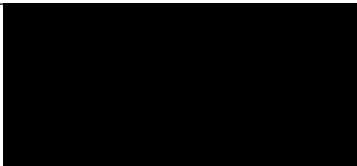
In light of this both parties acknowledge that criterion 4 of Policy PLP6 remains an area of disagreement. The other concerns raised in HE's Regulation 19 response, surrounding Policy PLP6, have been addressed and resolved.

4. Signatories

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.

HE and PCC agree all the proposed changes to the Pre-Submission Local Plan as set out in Appendix C of this document. There are two outstanding matters relating to tall buildings and the Core Commercial Area of Portsmouth City Centre, which are areas of disagreement.

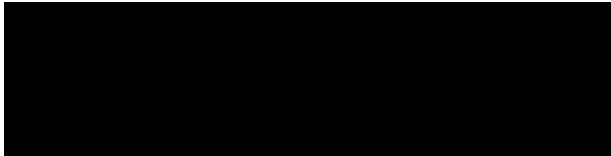
	Signed: 	Signed: 
	Name: Lucy Howard	Name: GUY ROBINSON
	Position: Head of Planning Policy	Position: Historic Environment Planning Adviser
	Portsmouth City Council	Historic England
	Date: 10-02-25	Date: 7 February 2025

Appendix A - Letter titled from HE to PCC 'Informal engagement on emerging Portsmouth Local Plan (PLP)' (12/01/24)



Historic England

Ben Cracknell
Principal Conservation & Design Officer
Planning & Economic Growth
Portsmouth City Council



12 January 2024

Dear Ben

Informal engagement on emerging Portsmouth Local Plan (PLP)

Thank you for your email of 2 January and for sharing draft material with me to inform our discussion about the emerging new local plan for Portsmouth. My headline comments are as follows, and I offer more detailed feedback in an appendix.

Heritage policies

It is great to see several heritage policies within the proposed plan. I suggest wording changes to the draft heritage policies where I believe there to be potential conflicts, either within the plan or with national policy.

PLP3: Tipner West & Horsea Island East

I look forward to reading the Council's topic paper supporting this allocation. Meanwhile, I recommend including in policy more clarity on the requirements to conserve the significance of Portchester Castle.

PLP6: Portsmouth City Centre

I remain concerned by the high-level nature of content on city centre proposals, coupled with the lack of clarity about the status of the City Centre Development Strategy (elements of which presumably are now out of date). The approach to the city centre in the local plan is essentially area-based and does not benefit from the detail of more focused site allocations. Consequently, policy PLP6 omits key heritage issues, which for the sake of clarity we consider to be **unsound**. I append detailed suggestions that would reduce our concerns. Ultimately, a positive strategy for heritage in the city centre depends on a more detailed approach.



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Design

While not the subject of our current exchange, I wonder if design coding would provide a helpful way forward, seeking to avoid harm to the historic environment and, more positively, support positive change. Potentially design coding could be tailored to each part of the city centre (noting the level of change will differ from area to area).

Cultural and visitor economy

I wholeheartedly support much of the content in this section. That said, there is something of a mismatch between this text and other elements of the plan where heritage is given insufficient attention, especially in planning new development. For example, the Charles Dickens Museum (Grade I) is an acknowledged cultural destination, but its setting and the character of the Mile End conservation area is under threat from new development and the current approach in PLP6.

Heritage Strategy

It is great to hear that the Council is preparing a revised Heritage Strategy. In the appendix, I suggest points to consider when preparing the revised Strategy. The local plan has a vital role in supporting the delivery of the Council's heritage ambitions. The Strategy can help to inform the Local Plan and add invaluable detail on the prioritisation of key projects.

Heritage at risk

The draft Heritage Strategy (2020) states that the Council will “Progress work relating to a local 'at risk' register”. It is important that the Local Plan supports this initiative. While policy PLP53 supports work on heritage at risk, its supporting text defines such assets only as “those which have been identified through the Historic England Risk Register”. We would object to this approach, because it considers only some types of designated heritage asset and omits non-designated heritage assets.

Final comments

I am unsure what the symbols denote but am sure this will become clear!

This review has been done rapidly and clearly does not represent our final word on anything of the matters covered. Nonetheless I hope these comments are helpful and I look forward to discussing relevant issues with you on 19th January.

Kind regards

Guy Robinson, BSc, MRTPI
Historic Environment Planning Adviser
Development Advice – London and the South East Region



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APPENDIX: More detailed comments

Strategic Policy PLP53: Historic Environment

- Noting in passing that the criteria numbering has gone awry, the first criterion 2 is slightly tougher than the NPPF. While this may be intentional (which would need to be justified), the NPPF refers to wholly exceptional circumstances when a proposal would cause substantial harm to assets of the highest significance. Also, I am inclined to suggest wording on less than substantial harm be added. Taking these points into account, potential revised wording could read:

“Proposals which are considered to substantially harm the significance of a designated heritage asset will not be permitted except in wholly exceptional circumstances (for assets of the highest significance, wholly exceptional) and where a robust justification has been made in accordance with the requirements of the NPPF. For proposals that would cause less than substantial harm, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing optimum viable use of the asset.”

- To align with national policy, criterion 6 should refer to significance rather than appearance i.e.

“Proposals for alteration and/ or extension that conserve or enhance the significance ~~appearance~~ of non-designated heritage assets will be supported. Non-designated heritage assets should be retained where appropriate.”

- Criterion 7 conflicts with national policy if the harm were substantial. Reflecting on this draws one into thinking about substantial and less than substantial harm. While I'd welcome separate policy provision on RPGs, it would be inappropriate only to refer to less than substantial harm for RPGs. Given the current proposed wording on RPGs is high-level, I am not sure it merits distinction from a more general approach on designated heritage assets. If you agree, amending criterion 2 as above, criterion 7 could be deleted. Alternatively, the Council may consider working on more detailed (potentially separate) RPG policy provision.
- I warmly welcome criterion 8 on climate change mitigation. When supporting the retrofit of historic buildings, I recommend referring to a whole building approach and the need for heritage expertise. Proposed wording for consideration:
“Development proposals for works to heritage assets that are intended to adapt to, or mitigate the effects of, climate change will be supported where it can be clearly demonstrated that they conserve the fabric and/or setting of the asset. A whole building approach is recommended for the retrofit of traditionally constructed buildings, informed by heritage expertise.” Our latest Advice Note (upon which we recently consulted) provides more detail:
<https://historicengland.org.uk/about/what-we-do/consultations/guidance-open-for-consultation/closed-guidance-consultations/>

In the text supporting policy PLP53:

- In the paragraph on non-designated heritage assets, note there are various ways in which NDHAs can be identified, including via neighbourhood planning.
- I recommend referring in supporting text to embodied carbon. Currently the text does not fully articulate the contribution that the retention and reuse of old buildings makes to embodied carbon (as well as to local distinctiveness), together with the sustainability of traditional building materials and design. Avoiding demolition and favouring sensitive retrofit of historic buildings is preferable where possible. As you will know, embodied carbon was a factor in the [July 2023 decision](#) not to grant planning permission for the demolition of the M&S Marble Arch store and its redevelopment on Oxford Street
- Regarding footnote 3, note our 2011 advice note on enabling development has been superseded: <https://historicengland.org.uk/images-books/publications/gpa4-enabling-development-heritage-assets/>

Development Management Policy PLP54: Listed Buildings

- Currently the text seeks to avoid harm or accept harm that is outweighed by benefits. To fully align with national policy (e.g. NPPF paragraphs 195 and 196) we would advocate greater support for minimising unavoidable harm.
- Criterion 2 offers a strong position, but there is a risk that this is perceived either as in conflict with policy PLP53 or with the NPPF. Without wishing to dilute your proposed position, I wonder if the language might be tailored more closely to the provisions in the Planning (Listed Buildings and Conservation Areas) Act 1990, which should then also be referenced in the supporting text.
- Taking the above points together, potential revised wording below:

“1. Development proposals which affect a listed building or its setting will only be permitted and Listed Building Consent and or Planning Permission granted where:

a) They preserve or enhance the significance of the listed building and its setting by demonstrating that loss of historic fabric and detail of significance, including internal features, floor plans and the integrity of the rooms, is avoided; or

b) Harm to the significance of the listed building or its setting is minimised and considered to be outweighed by public benefits by the Council, ~~when~~. In such circumstances, appropriate mitigation measures will be expected, including archaeological investigation including a written report or recording.

2. Development proposals will be refused planning permission and/or listed building consent where they cause substantial harm to a listed building or its setting, or any features of special architectural or historic interest which it possesses.”

Development Management Policy PLP55: Conservation Areas

On first reading, no comments. It looks good. That said, I'd encourage more detail in the supporting text about the significance of conservation areas and the contribution they make to local identity. Also, the text could be explicit about the merits of drawing from conservation area appraisals when considering the context of a site, especially when preparing design codes.

Development Management Policy PLP56: Archaeology

I suggest slightly expanding the context in criterion 1 in which a heritage statement may be needed. Also, I would add that field evaluation may be needed i.e.

"1. Development proposals will be permitted where they do not cause harm to archaeological heritage assets and/or their setting. Where the site includes, or has the potential to include, heritage assets with archaeological interest, Sufficient information in a Heritage Statement is required to allow an informed assessment of the significance of the archaeological heritage asset and its setting, and the impact of the proposed development on that significance. Field evaluation may also be needed."

In the supporting text, I'd recommend adding text to state that Historic England should be notified where Scheduled Monument Consent (SMC) is required in addition to planning permission, and encourage pre-application engagement with Historic England for all proposals that are likely to affect the significance of a Scheduled Monument.

PLP3: Tipner West & Horsea Island East

I will be interested to read the Tipner West & Horsea Island East Topic Paper (and the HELAA as appropriate) to learn more about the evidence informing policy PLP3. As my predecessor stated in our response to the Regulation 18 consultation in 2021, we are looking for the Council to present evidence to show that the proposed level of development can be accommodated without unacceptable harm to the historic environment. My impression is that current pre-application discussions are heading in a positive direction from a heritage perspective, subject to agreeing an approach on massing. Of course, key concerns and requirements must also be reflected in the local plan. To that end, I propose the following amendments to policy PLP3 and its supporting text for discussion:

Within policy PLP3

"2. Development proposals for the above named uses will be permitted provided that they meet all of the following site specific development requirements:



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- a) Create a new landmark gateway to the City of Portsmouth to be demonstrated through a conceptual site-wide masterplan with an accompanying design code framework that delivers beautiful place-making and has regard to the National Model Design Code;
- b) Break down the barriers, both physical and perceived, created by the M275 motorway and Portsbridge Creek. This will be achieved through the design of both buildings and spaces to create excellent connections with new development at Tipner East and the wider area;
- c) Allow views to and from Tipner West and notable landmarks within the zone of visibility including Portchester Castle, the Spinnaker Tower and His Majesty's Naval Base. The design, scale and massing of the scheme needs to respond sensitively to the significance of Portchester Castle (including its setting), taking into account its dominance in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance;

Within the text supporting PLP3, in summary, I suggest:

- Deleting an unwanted comma after “detailed assessment”.
- Reordering the wording to ensure it is clear that enhancements are actively encouraged (rather than “should be... encouraged”).
- Making clear the Scheduled Monuments should be retained, rather than “seeking” to retain them. Also, the report on those assets was published by Historic England rather than English Heritage.
- Adding more text on Portchester Castle.

“... To ensure that their value and the positive contribution that they can make to character of any scheme is fully realised, any development proposals for the site should be based on a detailed assessment, of the significance of the assets and their setting. This assessment must then positively inform any detailed design proposals for the site. Opportunities to provide public access to the heritage assets and/or their surroundings on Tipner West along with interpretation/explanation of their significance should be explored and are encouraged where feasible ~~encouraged~~.”

Second World War landing craft slipways are located on the southern shore of Horsea Island. They are the largest surviving remains of infrastructure created to support D-Day on 6th June 1944 at the end of the Second World War; a Research Report on the slipways has been published by Historic England~~English Heritage~~¹¹. They were designated as Scheduled Monuments in 2022 and all development proposals for the site should ~~seek to~~ retain, conserve and where possible enhance the slipways and their setting...

...The site has a prominent location at the top of Portsmouth Harbour with views to and from prominent landmarks. A number of the landmarks extend beyond Portsmouth city boundary. Portchester Castle has been a dominant feature of Portsmouth Harbour since the late Roman period. It incorporates a Scheduled Monument, Portchester Castle (Grade I) and St. Mary's Church (Grade I). Massing of development on Tipner West needs to respond sensitively to avoid harming the significance of the Castle and enable its prominence along this section of the coast to continue. A Landscape and Visual Impact Assessment prepared in accordance with the Landscape Institute's Guidelines¹⁴ is required to identify the effects of the proposed development on views and on the landscape itself."

PLP4: Tipner East

No comments.

PLP6: Portsmouth City Centre

In the opening of this policy, might criterion j be expanded to connect with the historic environment and perhaps mention impacts on key views? I will be interested to see if/how the plan's content and its supporting evidence considers views. The plan's encouragement for tall buildings prompts the question – how clear is it about what views are important in the city, and how large scale development in one part of the centre might impact across the wider area? I'd be interested to discuss this with you.

Within policy PLP6 on City Centre North

Notwithstanding outline application 22/01243/CS3, I recommend referring to headline heritage issues in this area of the city as they relate to its proposed development, and, for the sake of clarity, consider their omission to be **unsound**. I suggest revised wording for consideration.

"3. ... Proposals in City Centre North should include the following elements within a master plan; a Large Urban Green Park; Improved Connections to wider neighbourhoods and amenities; Streets and Squares for play and socialising; commercial opportunities; a new Primary Mobility Hub at Commercial Rd; and creation of a cyclable and walkable neighbourhood. Biodiversity Net Gain of at least 20% is demonstrated and secured in perpetuity (at least 30 years) on site. Proposals must take into account the character and significance of the Mile End conservation area (minimising harm to the significance and appreciation of the conservation area), and respond sensitively to St Agatha's Church (Grade II*) and All Saint's Church (Grade II) in terms of massing, scale and orientation."

Within the supporting text for City Centre North:

“... The northern part of the City Centre North site is potentially suitable for larger / taller buildings. Consideration will need to be given to the interaction with Hope Street and the dockyard, as well as the frontages facing the new park. There is potential within the scheme to create new landmark taller buildings, with heights of upwards of 20 storeys possible if well designed. An additional important consideration will be how development, especially any tall buildings, would impact on the character of the Mile End Conservation Area, including the birthplace of Charles Dickens (a Grade I listed building). This area manages to remain a haven of relative tranquillity. The Mile End Conservation Area Guidelines state that “The conservation area is separated from modern development by the boundary wall which blocks off Old Commercial Road at its southern end and serves both as a pedestrian entranceway into the conservation area and as a screen to mask the area from modern development”. The effectiveness of such screening needs to be considered when large scale development is proposed. When viewed from Old Commercial Road, new buildings visible above the roofline would represent an unwelcome intrusion and would harm the significance of the conservation area and the buildings within it.”

The City Centre Commercial Area (policy and supporting text)

I am concerned by and **would anticipate objecting** to silence in the draft content (both policy and supporting text) on the historic environment within this part of the city centre. As stated in our response at Regulation 18, we would not support the loss of the listed buildings due to redevelopment. I do not propose alternative wording at this time, as the current approach offers insufficient detail on which to comment.

Within policy PLP6 on the Station Road Regeneration Area

I recommend being explicit about the need to consider the historic environment and suggest the following wording for consideration:

“Development within the Station Road Regeneration Area (as shown in figure 4.5) will be permitted where they provide a significant contribution to the City's housing and other needs by providing good quality, high density and tall buildings. Proposals impacting the area around Portsmouth and Southsea Train station should contribute to improved connectivity and street scene within the City Centre without unacceptable harm to the historic environment. Proposals in this area should create a gateway to the City linking the commercial core around Commercial Road to the Cultural and Civic Centre focused on Guildhall Square and Guildhall Walk.”

Within the supporting text on the Station Road Regeneration Area:

In the supporting text, I welcome reference to the setting of Portsmouth and Southsea Station, the Cenotaph and Victoria Park and recommend including the grade at which they are designated to ensure it is clear that they are designated heritage assets i.e.



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“Proposed buildings of height and density should consider the setting of Portsmouth and Southsea Station (Grade II), the Cenotaph (Grade II*) and Victoria Park (Grade II).”

Also, it's good to see reference to enhancements to the Station building to improve its role as a gateway and its legibility for users. That said, I am uncertain what is meant by legibility in this context. When approaching the front of the station, is it not the case that tall buildings seen over its roofline would impair that legibility? If so, the local plan should make clear how this would be avoided.

Within policy PLP6 on the Guildhall Quarter / Regeneration Area

While the policy proposes to protect heritage assets, which is welcome, I encourage a more explicit commitment regarding the listed buildings within this area, noting the important contribution they make to the character of the area. This could be done by minor reworking of the text as below. Also, the policy should refer to the Guildhall and Victoria Park Conservation Area, not simply the Victoria Park Conservation Area:

“Proposals within the Guildhall Cultural Regeneration Area (as shown in figure 4.5) will be permitted where they contribute to the existing mix of cultural, civic and town centre uses. Development within this area should protect and enhance the significance (including the setting) of heritage assets and look to raise the overall quality of the area's built environment. By sensitively incorporating the area's listed buildings and responding positively to their significance and the wider historic environment, proposals should help to enhance the character and appearance of and the Guildhall and Victoria Park Conservation Area and look to raise the overall quality of the area's built environment. The Guildhall Square and Guildhall Walk will be a focal point for cultural, community, and civic development. Proposals that reinforce this role will be supported. Proposals that create active frontage facing onto Guildhall Square will also be supported.”

I suggest adding detail into the supporting text on the Guildhall Regeneration Area:

“To the north west of the Guildhall and university campus lie Victoria Park and the City's Roman Catholic Cathedral. The Registered Park (grade II listed) is an important very green space with a large number of mature trees, and historic monuments and features. The park is It lies within the Guildhall and Victoria Park Conservation Area protected by conservation area no 18 'Victoria Park'. The park is well loved, and used by the public, and is the only large area of public open space currently in this part of the city.

This area of the City is characterised by mid-rise development. The overall quality of the buildings is mixed although there are a number of buildings of high value with much of the area protected by conservation area (18 Guildhall and Victoria Park). Not every building is of a high quality and there are areas of ground level paved parking within the area which do little to add to its setting. Proposals for development /



redevelopment within this area of the City Centre should respect the character and setting of the Guildhall and Victoria Park Conservation Area and aim to raise the overall quality of the built landscape of the area through careful use of high quality materials reflecting the finer architectural examples around the Guildhall Square and Guildhall Walk. Proposals for mid-rise development of a scale similar to the those in the vicinity would be in keeping. Proposals will need to take account of the listed settings of heritage assets, which include (among others) Victoria Park (Grade II), the Grade II* Cenotaph within Guildhall Square, listed buildings along Guildhall Walk (including the Theatre Royal (Grade II*)) and the Roman Catholic Cathedral (Grade II). These assets make an invaluable contribution to the character of the area and their heritage significance needs to be protected and better revealed through sensitive design."

PLP8: St James' & Langstone Campus

Within policy PLP8

I recommend referring to heritage assets (aligning with the NPPF) rather than historic assets, and heritage statement (aligning with PLP53) rather than heritage assessment. This would entail minor changes as follows:

"2. Development proposals for the above named at uses will be permitted on the St James' part of the site provided that they meet all of the following site-specific and overarching development requirements:

- a) Retain, and conserve the significance and setting of St James's Hospital (Grade II listed), and the Chapel (Grade II listed), and all other heritage ~~historic~~ assets in the hospital grounds;
- b) All proposed developments must be accompanied by a heritage statement (in accordance with policy PLP53) assessment;
- c) The design and layout must conserve, or enhance and appropriately integrate into the locally distinct parkland landscape setting and open character of the site;"

Within the supporting text:

Could the dividing line between the two areas be shown more clearly in Figure 4.7?

More importantly, I recommend expanding the supporting text on St James Hospital to ensure it is clear what is significant and facilitate a suitable design response. We challenged the evidence supporting this allocation in our response at Regulation 18 and I maintain a degree of concern on this point. Proposed wording for consideration:

"The strategic site contains several ~~two~~ listed buildings, the hospital and the chapel. The hospital is a good example of a late Victorian asylum, with an impressive principle elevation, symmetrical plan form, communal hall, external airing courts and chapel set within a wider expansive landscape. It survives largely intact, though it has been much extended in the latter part of the twentieth century. Proposals should

minimise harm to the architectural and historic interest of the building and allow the primacy of the main building to be retained. Proposals are encouraged to enable the building's heritage significance to be better revealed and appreciated. The Chapel is little altered externally with some limited 20th century alterations to the interior. It is of special architectural interest, much of which is seen in the exterior of the building. In addition to these listed buildings are other buildings of historic importance and other heritage assets, including the hospital grounds themselves (which are included on the Hampshire Gardens Trust Register and thus considered a non-designated heritage asset). Therefore, to ensure any development conserves or enhances these, a heritage assessment or statement must be prepared and submitted. This must assess and understand the significance of any assets and ensure that any subsequent design proposals carefully and sympathetically respond to the presence and significance of the assets. "

PLP30: Cultural and Visitor Economy

There is a lot for us to welcome in the section supporting Portsmouth's cultural and visitor economy. That said, though the supporting text clearly articulates links between the city's heritage assets, its culture and economy, the same cannot be said of the policy. This could result in missed opportunities and potentially weakens the positive strategy being taken by the Council towards the historic environment. I suggest being more explicit in policy PLP30 with reference to the historic environment as a consideration. Proposed revised wording for consideration:

"The proposed development is of an appropriate type, scale and design to complement and support the role of the existing centre or area, ~~and~~ enhance its character, and respond sensitively to the significance of the historic environment."

The Heritage Strategy

We warmly welcome the 2020 strategy being updated and expanded as appropriate.

In our response to a consultation on the draft Heritage Strategy in September 2021, we welcomed the preparation and aims of the Strategy and highlighted areas for refinement and more detail. If given the opportunity now, I would highlight the benefits that could result if the Heritage Strategy were to assess the current threats faced by the historic environment in Portsmouth, including but not limited to development pressure (integrating with the latest iteration of local plan), climate change and flood risk, and prioritise action on those which the Council can address effectively.

Flowing from this would an action plan, most likely the need for a local 'at risk' register, and other projects and measures to address climate change and flood risk (as we discussed briefly when we spoke before Christmas).



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**Appendix B - Historic England's Representation on the Regulation
19 Pre-submission Portsmouth Local Plan (03/09/24)**



Historic England

FAO:
The Planning Policy team
Portsmouth City Council

Our ref:



policyconsultations@portsmouthcc.gov.uk
by email only

03 September 2024

Dear Planning Policy team

Portsmouth City Council's Regulation 19 Local Plan (PLP) to 2040

Thank you for consulting us about Portsmouth City Council's Regulation 19 Local Plan (PLP) to 2040. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

We welcome much of the plan's heritage content, including its suite of heritage policies, and acknowledgement of different ways in which heritage contributes to all three pillars of sustainable development in Portsmouth. Also, we welcome the Council's commitment to building retention, expressed through Core Policy PLP2: Climate Emergency, PLP33: Sustainable Construction and Onsite Renewable Energy and Strategic Policy PLP53: Historic Environment.

Furthermore, we welcome the preparation of a Heritage Strategy and consider it vital for that Strategy to connect effectively with local plan. In addition to the plan's reference to the Heritage Strategy in chapter 7 on the city's economy, we advise adding more on the Heritage Strategy in chapter 11 on the historic environment, especially on heritage at risk (representing a common issue in both documents).

Our detailed comments are appended: most are included in Appendix A; Appendix B provides our high-level feedback on the plan's Sustainability Appraisal. In this cover letter I highlight the areas where we raise concerns about soundness and currently object to the relevant policy approaches. We have endeavoured throughout to be constructive in suggesting ways in which these issues could be resolved.



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PLP1: Design

While we do not object to the development of tall buildings in Portsmouth, we **object** to PLP1's approach to tall buildings, considering it to be insufficiently justified and in conflict with national policy on the protection of the historic environment. In summary, we propose two key changes to the local plan that would in our view enable us to find the plan sound on this matter:

- a) adding a requirement for both heritage impact assessment and landscape and visual impact assessment. We suggest this could be integrated within a broader point about the need for design excellence (strengthening the point already made in paragraph 3.46), which we assert is crucial for tall buildings in this relatively flat city, especially in its more sensitive locations;
- b) reverting to the opportunity areas identified for tall buildings for Tipner in the adopted Portsmouth local plan rather than covering the whole of West Tipner (where tall buildings could threaten the dominance of Portchester Castle), unless evidence can be provided that a flexible approach would not cause unacceptable harm to the historic environment.

We note that "The careful siting of tall buildings in the context of placemaking" is considered a key issue for the historic environment in the Sustainability Appraisal. As things stand, we are far from convinced that the plan does support careful siting of tall buildings across Portsmouth. We encourage the Council to prepare a new SPD on tall buildings, the potential for which is alluded to in criterion 7c of PLP1, informed by comprehensive heritage assessment and public consultation.

PLP3: Tipner West and Horsea Island East

While there is much in this policy that we support, we are concerned that Tipner West is almost entirely covered by a proposed area of opportunity for tall buildings, via PLP1. We address this point above and assert that it is inappropriate to plan for tall buildings across the whole of Tipner West. Furthermore, neither the policy nor the supporting text requires a heritage statement (i.e. heritage impact assessment). We suggest a new line is added to paragraph 4.25 to address this concern.

We assert that hydrodynamic modelling is needed, noting that any increase in land mass through reclamation and/or any associated flood defence measures or dredging has the potential to cause funnelling of water that results in a scouring effect on the designated D-Day Slipways. We suggest an amended policy criterion that would address this point.

PLP6: Portsmouth City Centre

We retain concerns that the policy approach would benefit from more granularity, though we appreciate the detail added to this section of the emerging plan late last year. In terms of our headline concerns, we assert that heritage significance needs to be added to PLP6's criterion on design (2j), noting the fundamental contribution made by heritage to the city centre's appearance and character.

Furthermore, we have a serious concern about the flexible nature of some of the policy wording, leaving open the possibility for schemes to come forward focused on demolition and replacement in a way that fails to reinforce the Council's commitment to building retention highlighted above.

Criterion 4 on the Commercial Area is where the lack of heritage detail is particularly noticeable, and where the supporting text mistakenly refers to the two churches in the City Centre North area. There are four listed buildings in the Commercial area, plus other handsome buildings. **The policy approach fails to connect with these assets and the character of this area.** The report published by Historic England on behalf of the Historic Places Panel suggests this area merits conservation area status and recommends that the Council consider such designation to promote the conservation and enhancement of the area's character, and to improve design standards: [Historic Places Panel Review Paper Portsmouth, 2023 \(historicengland.org.uk\)](https://historicengland.org.uk) – see pages 24 and 25. As a key next step, heritage impact assessment is needed at this stage for the Commercial Area, to embed what is currently missing - a clear understanding of this area's significance and how best to respond positively to that significance.

PLP10: Land west of Portsdown Technology Park

The policy and supporting text refer to Fort Southwick as a Scheduled Monument, but neither acknowledges it is also a Grade I listed building. Furthermore, we recommend proportionate heritage impact assessment to inform this policy, especially regarding its approach to heights and massing.

PLP11: Port Solent

We note that much of Port Solent is covered by a proposed area of opportunity for tall buildings, via PLP1 and the policies map. The policy refers to inter-visibility with Portchester Castle but does not engage with impacts on heritage significance. We recommend adding a criterion similar to the protection afforded to Portchester Castle in PLP3. Also, the approach needs to require a heritage statement from the applicant to recognise the heritage sensitivities of this location and complement work required on visual impact assessment.

PLP13: Fraser Range

We consider this policy to be unsound principally because this refers to Fort Cumberland as Grade II rather than II*. There is a significant difference between these gradings and so this detail matters.

PLP14: The News Centre

The policy is unsound because it does not refer to the setting of nearby assets, such as Hilsea Lines Scheduled Monument. While this consideration is mentioned in supporting text, we believe it merits inclusion as a policy criterion to avoid harm to the setting of nationally important assets in a way that is not aligned with national policy. Proportionate heritage impact assessment would help to inform the policy approach.

PLP15: Somers Orchard

The policy includes a requirement for tall buildings and high-density blocks. We **object** to the requirement for tall buildings. We believe the site lies outside the Council's proposed opportunities area for tall buildings (so would conflict with PLP1) and between two conservation areas – The Terraces and King Street.

Promoting tall buildings across the PLP15 area would harm the setting of these conservation areas in a way that does not align with national policy. We highlight the Council's duty to pay special attention to the desirability of preserving or enhancing the character or appearance of those areas under the Planning (Listed Buildings and Conservation Areas) Act 1990.

Heritage impact assessment summary

Taking stock of our comments on the sites above, we recommend preparing a new paper as part of the plan's evidence base that includes proportionate heritage impact assessment of selected sites. This is essential for PLP6: Portsmouth City Centre: commercial area and would be beneficial for PLP10: Land west of Portsdown Technology Park and PLP14: The News Centre.

Should the Council be reluctant to reduce the size of the tall buildings opportunity area at Tipner, we assert that detailed heritage impact assessment and landscape and visual impact assessment are needed now to demonstrate that unacceptable harm would not arise from development at Tipner West.

PLP20: Houses in Multiple Occupation**PLP23: Estate renewal****PLP34: Renewable energy****PLP36: Coastal zone**

The above four policies do not refer to the historic environment or heritage significance as a consideration. This results in an unsound approach that fails to align with national policy on the historic environment. We suggest wording changes that would resolve our concerns. PLP34 also includes a criterion relating to the impacts of community support which we feel needs to be phrased more clearly to be sound and avoid unintended consequences (including conflict with national policy).

As a final note, to reiterate, we have endeavoured to be constructive in our review, and would welcome the opportunity to engage with the Council in preparation of a Statement of Common Ground (in addition to the one already being prepared for Tipner West and Horsea Island East). If it is not possible to reach agreement on any or all of the issues, we would wish to participate in the relevant hearing session to explain and clarify our concerns, if necessary; to take part in any discussions on the matter; and to answer any questions the Inspector may have.

I hope that these comments are helpful. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

Guy Robinson, BSc, RTPI
Historic Environment Planning Adviser
Development Advice – London and the South East Region



Appendix A: Table of Historic England's comments on the Pre-Submission Draft of the Portsmouth Local Plan 2040

[Historic England's comments on the proposed Allocations are set out in Appendix B]

Page	Section	Sound/ Unsound	Comments	Suggested Change
7-9	Section 2: Vision and objectives	Sound	We support the vision and objectives	
10	Chapter 3: Development Strategy and Core Policies	Unsound	While the vision refers to the city's rich cultural heritage and maritime history, currently the text summarising the development strategy is silent on such matters. This is a significant omission, unsound because it would not align with national policy. Minor wording changes would address this concern.	"The development strategy for Portsmouth from 2020 to 2040 is to maximise the potential of developable sites focusing on the strategic sites whilst addressing the climate emergency, greening the City and achieving high quality design <u>that sustains heritage significance.</u> "
18	Paragraph 3.30		We suggest the approach to design should do more than "recognise" the city's unique heritage and suggest alternative wording for consideration.	"3.30 Portsmouth should continue to recognise <u>and sustain</u> its unique maritime heritage and characteristics, whilst looking ahead to establishing itself as a City renowned for its high quality architecture and public spaces. It can then continue to thrive as a vibrant city, which people want to live, work, and visit."
21 - 23	Core Policy PLP1: Design	Unsound	Criterion 2b refers to existing buildings or townscapes of heritage value when considering local context. This is welcome as far as it goes, but it sets an incomplete context for the historic environment, not aligned with national policy, as it omits other types of heritage asset such as Scheduled Monuments and Registered Parks and Gardens. We suggest amendments to 2a) iii) to address this concern.	"2. a) ... iii) Existing buildings or townscapes of heritage value <u>and the significance of heritage assets</u>" "7. Development proposals for a tall building(s) will be assessed against the following criteria:... <u>d) Excellence in design for tall buildings is of paramount importance, informed by a heritage statement and landscape and visual impact assessment. The Hard, close to the historic dockyard, Tipner West and Port Solent are especially sensitive locations.</u>



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Page	Section	Sound/ Unsound	Comments	Suggested Change
			Secondly, and more challengingly, the policy's approach to identifying areas of opportunity for tall buildings does not seem adequately to consider heritage significance. This approach risks creating conflict within the local plan and conflict with national policy regarding heritage conservation. The policies map referenced in PLP1 indicates large areas of the city are suitable for tall buildings. We note the policy is supported by a supplementary planning document (SPD) from 2012, which is supported by a tall buildings study from 2009. In heritage terms, we note the study principally considers potential impacts on listed buildings and conservation areas within Portsmouth, giving relatively little attention to potential impacts on the setting of Scheduled Monuments or assets outside the plan area. We are concerned by the flexibility offered, particularly in the following areas. <u>The Hard</u> The sensitivity of The Hard is readily apparent from the map on page 12 of the Council's tall buildings study. Tall buildings in this area would have to be exceptionally well designed to avoid harm to the historic environment. If this area is to be retained in the local plan, greater emphasis is needed in the criteria relating to design excellence.	



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Page	Section	Sound/ Unsound	Comments	Suggested Change
			<u>The City Centre/Dockyard/Portsmouth International Port</u> We retain a concern that tall buildings immediately adjacent to designated heritage assets has the potential to harm their setting and appreciation. This is particularly concerning close to the historic dockyard and throughout the Guildhall Quarter. <u>Tipner and Port Solent</u> Regarding Tipner, we note the tall buildings study states: "The relative proximity of Portchester castle across the harbour 2km to the north east, and the historic dockyard 3km to the south west may be of significance in terms of the impact of proposed tall buildings on views towards or out of either of these areas." The study's recommendation includes: "Give consideration to their potential impact on views towards and from Portchester Castle across the harbour to the north west." The study makes the same conclusion for Port Solent. Both recommendations are included in the SPD. We query the extent to which these recommendations have informed the local plan and note the respective areas of opportunity for tall buildings in Tipner and Port Solent seem to have grown substantially from those shown in the study (on page 12) and in the adopted local plan, compared with those in the proposed policies map, in a way that does seems unsupported by evidence.	



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			This is especially problematic for West Tipner, immediately opposite Portchester Castle, where tall buildings near to the coastline could challenge the dominance of Portchester Castle in the harbour. The flexibility being offered risks harm to heritage assets of high significance (Portchester Castle is a Scheduled Monument and the Church of St Mary's is Grade I) in conflict with the NPPF. Also, it risks internal conflict within the plan (PLP1, PLP3, PLP54, PLP53 and PLP56). We recommend reverting to the area of existing adopted area of opportunity for tall buildings in Tipner. Furthermore, when taking stock of our concerns across multiple locations, we assert the need to emphasise design quality for tall buildings, strengthening the point already made in paragraph 3.46. This is particularly important within more sensitive parts of the city. We recommend clarity on the assessments needed to support this process, being explicit about the need for both a heritage statement/heritage impact assessment and landscape & visual impact assessment. These are two separate requirements, which inter-relate. We suggest wording for consideration, linked with a new requirement within criterion 7.	



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Page	Section	Sound/ Unsound	Comments	Suggested Change
			The pursuit of high-quality design connects also with the use of a Design Review Panel. In this regard also we recommend strengthening the reference to the need to test concept plans as outlined in paragraph 3.36 on page 20. The current wording provides a weak requirement to engage with the City Council, local community / stakeholders and/or a design review panel. As a final point, paragraph 3.48 refers to 8 areas, but the policy refers only to 7 areas.	
26 / 27	Core Policy PLP2: Climate emergency	Sound	We support this policy, including its encouragement for reuse of existing buildings and structures.	
29	Paragraphs 3.70 and 3.71	Comment	We recommend acknowledging the (positive) heritage implications of retaining and reusing historic buildings.	
31	Table 4.1	Comment	We encourage the local plan to be explicit about the high-level heritage benefits that would be delivered via development of its strategic sites, and exemplify relevant ideas in suggested wording.	Tipner and HIE: • Flood defences • Land decontamination • New bridge • <u>Conservation and reuse of listed buildings and conservation and appreciation of the Scheduled D Day slipways</u> Portsmouth City Centre: • 2.9ha park • 20% Biodiversity Net • Gain at City Centre • North



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Page	Section	Sound/ Unsound	Comments	Suggested Change
				Enhanced Culture and Leisure offer, <u>including greater appreciation of the city's heritage</u>
36-39	PLP3: Tipner West and Horsea Island East	Unsound	Currently, there is an in-built conflict in the plan by including almost the entirety of West Tipner as an opportunity area for tall buildings in policy PLP1. This relates to the effectiveness of 2b of PLP3, the basic wording of which we support. While the biggest changes to resolve this relate to PLP1, users of PLP3 need a clearer steer on how to demonstrate compliance with the second half of PLP3 2b, which we suggest becomes a separate paragraph within the policy. In a similar vein, paragraph 4.25 should be split into two, noting the final two sentences that focus on Portchester Castle address an issue entirely different to the D Day slipways. A sensitive response to the significance of Portchester Castle needs to be informed by heritage impact assessment and landscape and visual impact assessment (LVIA). Noting reference is already made in the supporting text to LVIA (in paragraph 4.30) at minimum we suggest a requirement for heritage assessment is added to the supporting text (potentially paragraph 4.25). We note PLP8 includes a requirement for a heritage statement, indicating precedence with the plan for such a requirement in policy.	In policy PLP3: "b) Break down the barriers, both physical and perceived, created by the M275 motorway and Portsbridge Creek. This will be achieved through the design of both buildings and spaces to create excellent connections with new development at Tipner East and the wider area. [new c] The design, scale and massing of the scheme needs to respond sensitively to the significance of Portchester Castle including its setting, taking into account its dominance in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance;" Also in policy PLP3, we suggest adding a requirement to criterion o): "o) Future development of the site will require land raising and construction of flood defences. Their implementation should be informed by the SFRA Level 1 and 2 <u>and hydrodynamic modelling to ensure changes in water flow do not result in scouring of the Scheduled slipways;</u>" Paragraph 4.25 (second half of this paragraph, which we suggest becomes an independent new paragraph): "The Scheduled Portchester Castle is located approximately one mile to the north west of Tipner peninsula, across the open water of Portsmouth Harbour. Any development proposals for the site should also seek to understand the significance of the Castle and its setting, and where possible respond to the presence of the asset in



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			An additional heritage concern relates to the potential for unintended consequences from any increase in land mass through reclamation and/or any associated flood defence measures or dredging. Such actions have the potential to cause funnelling of water that results in a scouring effect on the designated D-Day Slipways. This needs further investigation through coastal hydrodynamic modelling to understand potential water behaviour scenarios, their impacts on coastal structures and options for erosion management. We suggest an amendment to criterion o) that would address this point. This could usefully be explained through relevant supporting text. We support the wording of criterion 3.	terms of impact on views both from, and towards the Castle. <u>This needs to be assessed through heritage impact assessment.</u>"
60-64	Strategic Site Allocation Policy PLP6: Portsmouth City Centre and its supporting text	Unsound	Criterion 2j on design merits revision to connect with what is already stated in paragraph 3.30 as part of the Council's Development Strategy. We suggest revised wording for consideration. In our response at Regulation 18 we expressed concern that the proposed zones were relatively large, and flagged benefit from a more detailed set of site allocations. We reinforced this concern through informal comments in late 2023. While we retain concerns about the high-level nature of the proposed approach, heritage considerations are integrated within most of the areas identified in PLP6, which is welcome.	In policy PLP6: "j) Major development in the City Centre should demonstrate how its design enhances the centre's appearance, <u>responds positively its heritage significance</u> and considers the needs and safety of all its users including reducing crime, through the provision of a design code;" Paragraph 4 of policy PLP6 requires editing informed by proportionate heritage impact assessment. In the supporting text: "4.105 A substantial new green space will create a new link between St Agatha's and All Saints Churches"



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			The main point where they are absent is in the Commercial area (also see below), which results in criterion 4 missing important connections with the area's history. This is a missed opportunity and unsound (not justified and in conflict with national policy). Heritage impact assessment is needed to provide the evidence that informs the approach taken. In the supporting text, "Church" should be "Churches" in paragraph 4.105 and the references in paragraph 4.111 to two churches surely relates to City Centre North and <u>not</u> to the Commercial Road area? I believe the Council's Commercial area includes four Grade II listed buildings (105 Commercial Road, 116 and 118 Commercial Road, Trafalgar House and Connaught Drill Hall). Also, it includes other handsome buildings (e.g. 107 Commercial Road) and features of interest such as the Jubilee Fountain (which we note is mentioned in criterion 4). There is significant use of high-quality materials such as Portland Stone. The character of this area is intimately bound up with the Portsmouth story. But the local plan does not seem to connect with this heritage. It appears not to be fully understood or appreciated, thus hampering positive heritage planning for the site's future. Heritage impact assessment is essential to inform the supporting text and the policy.	Paragraph 4.111 merits editing informed by proportionate heritage impact assessment.



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77 - 79	Strategic Site Allocation Policy PLP8: St James' & Langstone Campus	Comment	We support the broad thrust of the policy and suggest minor improvements to criterion a) in the policy wording.	"a) Retain, and conserve the significance and setting of St James' Hospital (Grade II listed), and the Chapel (Grade II listed), and all other heritage assets in the hospital grounds and conserve or enhance their significance (including their setting); b) All proposed developments must be accompanied by a heritage statement;"
94 - 95	Site Allocation Policy PLP10: Land West of Portsdown Technology Park and its supporting text	Unsound	For completeness it is important to recognise that this Fort Southwick is also a Grade I listed building, connecting also with the Council's legal duty under the Planning (Listed Buildings and Conservation Areas) Act 1990. Furthermore, proportionate heritage impact assessment would be beneficial to inform the approach to heights and massing on this site.	"i) Any new build development proposals for the site will respond positively to the presence of the following heritage assets: i. Fort Southwick (Scheduled Monument <u>and Grade I Listed Building</u>) and its setting; and ii. Any undesignated heritage assets within the site." "5.11 There are a number of important heritage and nature conservation designations in close proximity to the site. The Scheduled Monument of Fort Southwick, <u>which is also a Grade I listed building</u>, is immediately adjacent to the western boundary whilst archaeological finds in the area date back to the Bronze..." "5.17 The site is located adjacent to Fort Southwick, which is a Scheduled Monument <u>and Grade I listed building</u> built (c.1860) as part of the Palmerston Portsmouth defences. The site has some archaeological potential for prehistoric and/or Roman remains with evidence of barrows and enclosures."
96 - 102	Site Allocation Policy PLP11: Port Solent and its supporting text	Unsound	Consideration needs to be given to avoiding and minimising harm to the significance of Portchester Castle, in accordance with national policy. This relates to more than visual inter-visibility. Wording from PLP3 may help to embed a consistent approach on this issue, as suggested.	In policy PLP11: "O) Protect viewpoints and the wider visual impact across Portsmouth Harbour, including the impact on Portchester Castle. <u>The design, scale and massing of the scheme needs to respond sensitively to the significance of Portchester Castle including its setting, taking into account its dominance in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance</u>"



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			We note the requirement for LVIA is mentioned in supporting text rather than in policy (as required in PLP8 and PLP10). A requirement for a heritage statement also needs to be stated, at minimum in the supporting text.	In the supporting text: "5.39 The site also offers the potential for views out over Portsmouth Harbour and towards Porchester Castle. Where these views are currently achievable from public viewpoints all effort should be made to protect these. The application should be supported by a Landscape and Visual Impact Assessment to show how key viewpoints have been taken into consideration. This includes the protection of wider views, towards the site including from Porchester Castle and other key landmarks. <u>Any development proposals for the site should seek to understand the heritage significance of the Castle and its setting, through heritage impact assessment, and the scheme design respond sensitively to that significance.</u> "
104 - 105	Site Allocation Policy PLP12: St John's College	Comment	We support the policy and suggest a minor amendment to ensure clarity in the intention to connect with all heritage assets, not just those of historic asset (e.g. at the exclusion of archaeological assets)	"2 b) Retain, restore, and where possible enhance the fabric and setting(s) of any historic <u>heritage</u> assets on the site, as shown in figure 5.4;"
107 - 112	Site Allocation Policy PLP13: Fraser Range and its supporting text	Unsound	We assert that this policy is unsound principally due to what may be typographical error. Fort Cumberland is Grade II* Listed Building, not Grade II. Also, we note 2f should refer to Scheduled Monuments not Scheduled Ancient Monuments, thus aligning with national policy. Paragraph 5.57 suggests updating is needed.	"f) Any new build development proposals for the site must respond positively to the presence of the following heritage assets: i. Fort Cumberland (Scheduled Ancient Monument and Grade II* listed); ii. World War II Anti Tank Defences (Grade II listed); and iii. Any undesignated heritage assets within the Range site including where possible the remains of any gun emplacements on the eastern part of the site that shall be retained and their significance and setting conserved."



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112 - 117	Site Allocation Policy PLP14: The News Centre, Hilsea and its supporting text	Unsound	Policy PLP14 needs to refer to the setting of nearby heritage assets. Also, in the supporting text, paragraph 5.76 should make explicit that Hilsea Lines is a Scheduled Monument. Proportionate heritage impact assessment would be beneficial at this stage to inform the policy approach.	“3 c) The design of the site should seek to respond to and celebrate distinct elements of the original building's historic presence and architecture <u>and respect the setting of nearby heritage assets;</u>” “5.76 Historic Environment Records show close proximity of the site to a number of sensitive archaeological and historic assets, including the Hilsea Lines <u>Scheduled Monument</u> and a number of Listed Buildings. The setting of these assets should be considered as part of the design of any development of the site.”
117 - 121	Site Allocation Policy PLP15: Somers Orchard	Unsound	The final line of paragraph 5.90 suggests updating is needed. Historic England objects to criterion 2f of the policy which requires “tall buildings and high density blocks”. There are various ways to achieve high density, which do not all require tall buildings. The site lies <u>outside</u> the Council’s proposed opportunities area for tall buildings (thus the proposed policy approach would conflict with PLP1), and rightly so, as it lies immediately between two conservation areas – The Terraces and King Street – the character of both potentially harmed by a blanket requirement for tall buildings.	In the policy: “2 f) Includes tall buildings and high density blocks in order to achieve the densities needed to meet the required level of housing;”
143/ 144	Strategic Policy PLP20: Houses in Multiple Occupation	Unsound	Heritage significance of the building needs to be a consideration to represent a sound approach that aligns with national policy on the protection of the historic environment. We would prefer recognition in the policy (such as amending criterion c); but at minimum we assert that heritage significance needs to be recognised in supporting text, with a suitable link to the heritage policies of the plan. Cross-reference to chapter 11 is merited.	



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150 / 151	Area Allocation Policy PLP23: Estate Renewal	Unsound	The policy makes no reference to the historic environment, yet estate renewal areas intersect with heritage assets, such as the Portsea conservation area, HM Naval Base and St George Square conservation area, King Street conservation area and Mile End Conservation Area. While we support estates renewal, this needs to be done in a way that is informed by the historic environment. Cross-reference to chapter 11 is merited in the supporting text.	g) Deliver high quality design and sustainability, taking into account any relevant design guidance or codes <u>and the significance and character of any affected heritage assets.</u>
166	Development Management Policy PLP27: Employability & Skills	Comment	The supporting text provides an opportunity to promote the heritage skills sector, potentially making a link to the Council's Heritage Strategy and recognising & responding to the city's maritime heritage.	
170	Table 7.2	Comment	The entry on Commercial Road needs to connect with the area's character and heritage, informed by the heritage impact assessment suggested above.	
176 - 181	Strategic Policy PLP30: Cultural and Visitor Economy	Sound	We welcome the recognition given to heritage in this section of the plan.	
185 / 186	Strategic Policy PLP31: Flooding	Comment	We highlight the importance of flooding as an issue for the historic environment. Flood risk measures help to protect designated and non-designated heritage assets. Also, as acknowledged by criterion 1g) of the policy, flood prevention measures need to be sensitive to their surroundings. From a heritage perspective, this means not causing unacceptable harm to the setting of heritage assets or indeed the fabric of heritage assets. We recommend the addition of text on these concerns and would be happy to comment on any draft text emerging.	



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Page	Section	Sound/ Unsound	Comments	Suggested Change
	and its supporting text			
193	New paragraph 8.52	Comment	Might a new paragraph be added before the current paragraph 8.52, focusing on the implications of paragraph 8.51 regarding embodied carbon i.e. there is a significant amount of embodied carbon in the city's current building stock, elevating the importance of the Council's approach in favour of building retention.	
194	Development Management Policy PLP33: Sustainable Construction and Onsite Renewable Energy and its supporting text	Comment	We support this section and in particular the policy's support for retaining existing buildings where possible. That said, to avoid conflict with policy PLP53 (criterion 7) at minimum we suggest cross-referring to the section of the plan that focuses on the historic environment and acknowledging that the retrofit of traditionally constructed buildings requires a different approach. Cross-reference to chapter 11 is merited.	
197	Paragraph 8.67	Comment	We note that the 2010 study does not appear to consider the historic environment.	
198	Development Management Policy PLP34: Renewable Energy	Unsound	The sensitive receptors that need to be considered, and addressed in policy terms, include heritage. We suggest additional wording to be added to criterion 1. We are taking the liberty of assuming the natural environment should also be referenced. Cross-reference to chapter 11 is merited in the supporting text.	"1. Development proposals for wind turbines and solar photovoltaic arrays will be supported in principle at appropriate locations subject to it being demonstrated that there are no adverse impacts (or that they can be made acceptable) on living conditions including those from vibration, noise, shadow flicker, glint, glare and air quality <u>and taking into account impacts on the natural and historic environment.</u> "



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			Also, we query what is meant by “this will be identified as a preferred location for that technology” in criterion 3. How will this be identified? We support community energy, but we are concerned that the wording of criterion 3 is too open to interpretation, which could undermine its effectiveness.	
199	Paragraph 8.73	Comment	While reference is made to indirect as well as direct impacts, we assert that reference needs to be made to the setting of heritage assets, at least in the supporting text. We suggest wording for consideration. The route through which potential impacts are assessed from a heritage perspective is heritage impact assessment. It would help to state this explicitly.	“The City has areas which are covered by a variety of designations for ecology, historic and landscape reasons. Solar photovoltaic array and wind turbine proposals will therefore need to ensure that there will be no direct or indirect adverse impacts upon these designated sites and assets, or that those impacts can be made acceptable. <u>From a heritage perspective, potential impacts are assessed through heritage impact assessment, which includes consideration of any impacts on the setting of heritage assets. This is complemented by landscape and visual impact assessment.</u> In addition, the impact of development on the amenity of...”
204	Development Management Policy PLP36: Coastal Zone and its supporting text	Unsound	This policy needs to recognise the highly designated nature of the Portsmouth coastline from a heritage perspective, justified appropriately. We suggest potential wording in the policy and encourage the drafting of relevant supporting text. Cross-reference to chapter 11 is merited in the supporting text.	1. Development proposals in the Coastal Zone, as defined on the Policies Map, will be permitted where they:... c) Conserve and enhance the character of the Coastal Zone, <u>taking account of the contribution made designated and non-designated heritage assets;</u>”
207	Paragraphs 9.7 – 9.10	Comment	When describing the benefits of green spaces in cities, we believe the plan should also recognise that the natural environment and the historic environment are integral to each other. An integrated approach, such as that promoted by Historic England, Natural England and the National Lottery Heritage Fund in its joint statement (https://historicengland.org.uk/content/docs/advice/joint-statement-naturalengland-historicengland-nlhf/), has the potential to deliver multiple benefits.	



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209-213	Strategic Policy PLP38: Green Infrastructure and its supporting text	Comment	Building on an initial reference to the interaction between the natural and historic environments, the GI background paper acknowledges that many of Portsmouth's green open spaces also play an important heritage role. We encourage the Council to refer explicitly to a couple of examples relevant to Portsmouth: Hilsea Lines and Southsea Common.	
217 / 218	Strategic Policy PLP39: Biodiversity and its supporting text	Comment	Adding to the text (paragraphs 9.54 and 9.55) that supports implementation of policy PLP39, we highlight that newly created or altered habitats will sit within a historical landscape and may have both positive and negative impacts on setting as well as physical and chemical conditions of heritage assets.	
237/ 238	Development Management Policy PLP46: Local Green Spaces	Comment	We highlight the importance of recognising explicitly in the text some of the local green spaces are also designated for their heritage significance. The natural environment and historic environment are integral to each other, as picked up in our comments elsewhere. This provides an opportunity to cross-refer to the heritage section of the plan.	
239	Paragraph 10.2	Comment	We miss reference to cultural infrastructure, which is referenced in the NPPF paragraph 20. We assert that this includes the city's heritage assets and encourage the inclusion of a suitable reference to cultural infrastructure in this paragraph.	
248	Paragraph 10.48	Comment	This section of the plan seems currently to be missing acknowledgement of the contribution made by the historic environment to the public realm. This could be made explicit in perhaps an expanded paragraph 10.48. We encourage reference to Historic England's "Streets for All" guidance: https://historicengland.org.uk/images-books/publications/streets-for-all/	



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Page	Section	Sound/ Unsound	Comments	Suggested Change
252	Paragraph 10.67	Comment	NPPF paragraph 20 advises that: "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: ... c) community facilities (such as health, education and cultural infrastructure); ... " We consider cultural infrastructure to include all heritage assets within Portsmouth. The importance of cultural infrastructure to the character, authenticity, creativity and general attractiveness is widely and increasingly recognised, as is the importance of cultural infrastructure to economic activity and the health and wellbeing of communities (including elsewhere in the plan). It would be reasonable to expect the Council's approach to aim at least to maintain existing levels of cultural assets that exist within the district, and to seek improvements to secure the long term future of assets classed as 'at risk'. Currently there are 16 designated heritage assets on the national Heritage at Risk Register. We suggest one way of recognising this via specific reference to heritage at risk in paragraph 10.67.	"In assessing the necessary provision or contribution, priority consideration should be given to any specific deficits or impacts identified, for the following types of infrastructure, as appropriate: • Transport (to include electric vehicle charging infrastructure) • Flood Risk Management Infrastructure • Education • Healthcare • Green Infrastructure • Recreational Facilities • Community Safety Facilities • <u>Heritage at risk</u>"
258	Table 11.1	Comment	I'd suggest referring to heritage assets rather than historic assets, to align with the NPPF's terminology.	
259	Suggested new paragraph 11.6	Comment	We recommend adding a new paragraph before paragraph 11.6 that flags the connections between the strategic historic environment policy and the objective of being a healthy and happy city. The city's heritage is part of what contributes to local wellbeing.	



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Page	Section	Sound/ Unsound	Comments	Suggested Change
260 / 261	Strategic Policy PLP53: Historic Environment	Sound		
262	Paragraph 11.18	Comment	At risk assets include more than just the assets identified by Historic England. As acknowledged in the Council's emerging Heritage Strategy, we encourage local authorities to produce their own at risk registers, to support the identification of assets for regeneration and enhancement. The Council's Strategy states: "This is an area that may need to be taken forward to support prioritisation, particularly in the context of constrained resources." We flag this provides a good opportunity to reference the Heritage Strategy, which is otherwise not mentioned in this section of the local plan, a surprising and disappointing omission. The two should be firmly connected. We strongly recommend adding more detail here on heritage at risk and introducing the Heritage Strategy with the plan's chapter on the historic environment.	
263	Paragraph 11.25 and 11.26	Comment	As an incidental point, note there is a typo in paragraph 11.25: "t is incorrect" More substantive is suggested edits to paragraph 11.26, to reinforce the need for heritage expertise to inform the decisions made and refer to harm rather than impacts (the latter could be positive).	"Where a proposal related to the improvement of an asset's energy efficiency is considered necessary, and would require Planning Permission and/ or Listed Building Consent, technologies/ solutions that minimise and or mitigate any potential <u>harm impacts</u> should be prioritised. <u>Typically, this requires heritage expertise to inform the decisions taken.</u>"
264	Development Management Policy PLP54: Listed Buildings	Comment	Criterion 1a) may unintentionally constrain delivery of enhancements, by focusing solely on how loss can be avoided as a way of demonstrating compliance. This merits alteration. We suggest possible wording.	"They preserve or enhance the significance of the listed building and its setting by demonstrating <u>how significance is better revealed and/or how that loss of historic fabric and detail of significance, including internal features, floor plans and the integrity of the rooms, is avoided</u>"



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Page	Section	Sound/ Unsound	Comments	Suggested Change
264	Paragraph 11.30	Comment	The absence of a conservation area appraisal for Conservation Area number 22: HM Naval Base and St George's Square is a notable concern. We encourage the Council to be open about this in its local plan and commit to preparing such an appraisal as a high priority, explaining why this matters.	
264 / 265	Development Management Policy PLP55: Conservation Areas	Sound		
266	Development Management Policy PLP56: Archaeology	Sound		
289 / 290	Monitoring	Comment	Acknowledging the intended focus of the Council's heritage monitoring on the production of Conservation Area Appraisal production, we recommend adding explicit reference to 22: HM Naval Base and St George's Square as a high priority. Also, we recommended including a monitoring indicator linked with heritage at risk.	



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Appendix B: Comments on the Sustainability Appraisal (SA)

Focusing on the historic environment, the SA provides little help in assessing the relative merits of identified reasonable alternatives on housing supply (see page 28), noting uncertain impacts under all four scenarios.

Options H2 and H4 involve maximising housing delivery. Given there are heritage sensitivities linked with all 6 sites identified in paragraph 5.57 of the SA, while it is not automatically the case that maximising delivery equates to increased likelihood of harm, an approach to assessment that picks up the likelihood of harm increases is surely possible and more useful than the uncertain outcome. This is broadly concluded in paragraph 6.23 but the generic conclusions are less than ideal. We do not object to option 3 being the preferred option. However, paragraph 7.12 suggests that there will be significant negative effects from option H3, where surely the table on page 28 suggests an uncertain outcome.

The potential for the SA to support decision-making on housing is greater than its support on office development (pages 35 / 36). The same cannot be said of industrial / warehousing space, where intensification is likely to lead to bulky massing in Tipner West and Horsea Island East, which harm the setting of heritage assets such as Portchester Castle.

The ranking of options on page 38 for the historic environment is surely incorrect. Currently the text in paragraph 6.49 indicates minor positive effects for the historic environment for option IF4, which would suggest that would be ranking 1st in the three options, given the other two are marked as uncertain. A major increase in employment space is likely to negatively impact the historic environment. We note option IF5 is the Council's preferred option.

Paragraph 6.72 could be expanded further to articulate that the natural environment and historic environment are integral to each other.

We note the overall impacts of the plan on the historic environment are deemed to be uncertain at this stage. The SA states that it is ultimately dependent on-site level schemes demonstrating successful design, layout and integration.

We welcome the conclusion of minor positive effects arising from encouragement to retain historic buildings and support their re-use.

The SA Scoping Report on page 107 states "Whilst there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting, a limitation relates to the fact that it has not been possible to gather views from heritage specialists on sensitivity of assets / capacity to develop each of the sites." This is concerning. While this may not have resulted in a fundamentally flawed SA, it does undermine its use. Heritage expertise is crucial to the effective assessment of proposed sites, going beyond a proximity-based approach.



**Appendix C - Table setting out PCC's Response to Historic
England's Regulation 19 Representation**

Appendix A: Table of Historic England's comments on the Pre-Submission Draft of the Portsmouth Local Plan 2040

[Historic England's comments on the proposed Allocations are set out in Appendix B]

Page	Section	Sound/ Unsound	Comments	Suggested Change	LPA's position on comments and suggested changes
7-9	Section 2: Vision and objectives	Sound	We support the vision and objectives		Comment noted No action required.
10	Chapter 3: Development Strategy and Core Policies	Unsound	While the vision refers to the city's rich cultural heritage and maritime history, currently the text summarising the development strategy is silent on such matters. This is a significant omission, unsound because it would not align with national policy. Minor wording changes would address this concern.	"The development strategy for Portsmouth from 2020 to 2040 is to maximise the potential of developable sites focusing on the strategic sites whilst addressing the climate emergency, greening the City and achieving high quality design <u>that sustains heritage significance</u> ."	Comment noted – no change possible PCC confirmed that the development strategy reflects the 2040 Imagine Portsmouth Vision and cannot be changed. PCC also noted that there is a Design Vision within the PLP which highlights the heritage significance of the City. HE was happy with the reasoning provided and for the development strategy to remain as it stands in the Local Plan.
18	Paragraph 3.30		We suggest the approach to design should do more than "recognise" the city's unique heritage and suggest alternative wording for consideration.	"3.30 Portsmouth should continue to recognise <u>and sustain</u> its unique maritime heritage and characteristics, whilst looking ahead to establishing itself as a City renowned for its high quality architecture and public spaces. It can then continue to thrive as a vibrant city, which people want to live, work, and visit."	Proposed change accepted PCC agreed to accept the suggested change to paragraph 3.30.



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21 - 23	Core Policy PLP1: Design	Unsound	Criterion 2b refers to existing buildings or townscapes of heritage value when considering local context. This is welcome as far as it goes, but it sets an incomplete context for the historic environment, not aligned with national policy, as it omits other types of heritage asset such as Scheduled Monuments and Registered Parks and Gardens. We suggest amendments to 2a) iii) to address this concern.	"2. a) ... iii) Existing buildings or townscapes of heritage value <u>and the significance of heritage assets</u> "	Proposed change accepted PCC agree to accept the suggested change to criterion 2a.iii of PLP1: Design.



Page	Section	Sound/ Unsound	Comments	Suggested Change	LPA's position on Comments and suggested changes
			Secondly, and more challengingly, the policy's approach to identifying areas of opportunity for tall buildings does not seem adequately to consider heritage significance. This approach risks creating conflict within the local plan and conflict with national policy regarding heritage conservation.		The City of Portsmouth has an extremely high housing need, that is not being met. This has generated very significant pressure on the City's existing housing stock, areas of overcrowding, and homelessness in the City. Given the range of geographical and planning constraints affecting the Authority's scope of action, the LPA considers that the most efficient use of land possible is a clear imperative of the Plan. Going forward, this will make the delivery of tall buildings (in appropriate locations) fundamental to the city's attempts to meet its housing need. From the perspective of the LPA these points alone are considered sufficient to justify the approach to tall buildings that has been taken in the plan. When identifying and deciding the boundary of the areas of opportunity the LPA placed great weight on heritage considerations, but quite rightly did not focus on these exclusively as a determinant. Wider holistic considerations called for a balanced approach and a considered exercise of judgment in determining where to place the boundaries of the areas of opportunity. The Tall Building study which supports the policy makes clear for example at para 6.1 (p.13), that: "The construction of a tall building should not be discounted simply because a site lies within a conservation area or is located in close proximity to a listed building. The potential for areas of the city to accommodate tall buildings cannot automatically be ruled out on these grounds alone"



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					As with the NPPF, and previous Local Plans for Portsmouth, that one or more policies <i>may</i> conflict to some degree, either spatially in terms of the designations or constraints they relate to, and/ or at the point of determination is an unavoidable characteristic of the Planning system. The wording of paragraphs 206-209 of the NPPF also explicitly acknowledges and therefore accepts the possibility of harm arising on heritage assets from development. There is no requirement in legislation, or policy to entirely avoid or de-risk this possibility in respect of the potential impact of tall buildings on heritage assets or their setting. To the extent that the LPA considers this objective realistically achievable, it is important to note that determination of the areas of opportunity appropriately and justifiably called for a wider range of relevant factors than an exclusive emphasis on totally avoiding the possibility of any impact on the historic environment. When considered holistically alongside a wide range of (equally relevant and/ or important) - non heritage related considerations (also identified and considered in the supporting background study), the LPA considers that the objective of minimizing the potential impact of tall buildings on the City's historic environment is, with very limited and justified exceptions, met through this policy. The LPA do not consider the scale of the areas of opportunity identified on the policies map to be large, but rather, relatively modest - in the context of
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		The policies map referenced in PLP1 indicates large areas of the city are suitable for tall buildings. We note the policy is supported by a supplementary planning document (SPD) from 2012, which is supported by a tall buildings study from 2009. In heritage terms, we note the study principally considers potential impacts on listed buildings and conservation areas within Portsmouth, giving relatively little attention to potential impacts on the setting of Scheduled Monuments or assets outside the plan area.	the city as a whole. It is also important to note that it is not possible for any policy to preclude or prevent an application for a tall building coming forward outside of an area of opportunity. A point also highlighted (at para 1.5 (p.4) of the Tall Buildings SPD: "the existence of identified areas does not automatically rule out the development of tall buildings outside of the areas of opportunity". Having regard to this point, the areas that have been identified are considered for example, to be particularly appropriate in terms of limiting the possible impact of tall buildings on almost all of the City's Conservation Areas, and on its very extensive low rise (typically 2 storey) suburbs. The prevalence of which made this a particularly important consideration of the policy. The background Tall Buildings study considered and focused on the potential impacts on listed buildings and conservation areas in the city, because of their high number and wide geographical distribution. Any perceived relative absence of consideration for Scheduled Monuments (or assets outside the plan area) is a reflection of their relatively limited numbers in Portsmouth (18) and nearby, and in the great majority of cases their distance from anticipated areas of opportunity. Comment noted. The LPA consider the flexibility offered to be reasonable, balanced and appropriate.
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		We are concerned by the flexibility offered, particularly in the following areas. <u>The Hard</u> The sensitivity of The Hard is readily apparent from the map on page 12 of the Council's tall buildings study. Tall buildings in this area would have to be exceptionally well designed to avoid harm to the historic environment. If this area is to be retained in the local plan, greater emphasis is needed in the criteria relating to design excellence. <u>The City Centre/Dockyard/Portsmouth International Port</u> We retain a concern that tall buildings immediately adjacent to designated heritage assets has		<u>The Hard</u> The LPA consider that great emphasis is already placed on design excellence in PLP 1, and in the related Tall Buildings SPD - Their purpose is to secure the highest quality design possible for tall buildings proposals that come forward in the City. In respect of The Hard, the background study supporting the policy also notes at para 11.9 (p.13) - the proximity of the area to the railway station and interchange, and the pre-existence of a cluster of tall buildings in the area - as notable locational factors. When considered alongside the city's extremely high housing need, the LPA remain satisfied that the ground's for, and boundary of The Hard area's designation are reasonable and acceptable. I would also redraw your attention to comments made at our initial meeting. It is considered noteworthy that the LPA has already refused an application (for a 40 storey tower within the HM Naval Base and St George's Square Conservation Area - on the 'Brunel House' site), in part on concerns over heritage impacts). <u>The City Centre/Dockyard/Portsmouth International Port</u> Concern noted. For reasons already discussed above, the possibility that a tall buildings proposal may come forward immediately adjacent to designated heritage asset(s), including close to the historic dockyard and in the Guildhall Quarter, is not alone considered by the LPA to justify a change to the footprint of the area.
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		the potential to harm their setting and appreciation. This is particularly concerning close to the historic dockyard and throughout the Guildhall Quarter.	It is also notable that in contrast with some historic city's - whose center's are characterized by a dense concentration of heritage assets, the number of designated assets in Portsmouth's Commercial Centre (focused around Commercial Road) is limited to a modest (six) 6 buildings. Bearing in mind the city's extremely high housing need, and the absolutely critical role which the Plan anticipates for the City Centre in accommodating growth, the adoption of a change to the boundary of the area of opportunity - to avoid possible harm to the setting or appreciation of these 6 assets is realistically not considered a credible position for the LPA to adopt in the context of the City Centre. Bearing this point in mind, it is also notable that Historic England (HE) themselves recently chose not to afford the Council's own Civic Offices listed status. <u>Tipner and Port Solent</u> Comments regarding Tall Building's Study noted. The analysis of the Tipner and Port Solent areas found in the Tall Buildings Study, does not in and of itself constitute a set of recommendations, and does not bind the LPA to a single immutable boundary for this, or any other area of opportunity. The 'Possible Development Considerations/Constraints' for Tipner and Port Solent identified in the Study do not preclude reasonable and limited adaptation of the boundary of the Areas of Opportunity as identified
		<u>Tipner and Port Solent</u> Regarding Tipner, we note the tall buildings study states: "The relative proximity of Portchester castle across the harbour 2km to the north east, and the historic dockyard 3km to the south west may be of significance in terms of the impact of proposed tall buildings on views towards or	



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		out of either of these areas.” The study’s recommendation includes: “Give consideration to their potential impact on views towards and from Portchester Castle across the harbour to the north west.” The study makes the same conclusion for Port Solent. Both recommendations are included in the SPD. We query the extent to which these recommendations have informed the local plan and note the respective areas of opportunity for tall buildings in Tipner and Port Solent seem to have grown substantially from those shown in the study (on page 12) and in the adopted local plan, compared with those in the proposed policies map, in a way that does seems unsupported by evidence. This is especially problematic for West Tipner, immediately opposite Portchester Castle, where tall buildings near to the coastline could challenge the dominance of Portchester Castle in the harbour.	on the Policies Map of the emerging Plan including at Tipner. The LPA considers that the analysis in the Study, still supports the larger but still relatively modest boundary that has ultimately been identified in the emerging Plan. The LPA do not consider the location, scale or boundary of the area of opportunity at Tipner West to be especially problematic. A one mile offset distance separates the two sites, irrespective of the nature of the setting between them (across open water - free of the intercession of development), their separation distance ensures that they cannot reasonably be described as 'immediately opposite' one another. In consequence of this, it is not considered possible for development at Tipner to impact on the close, or possibly even what could be described as the intermediate setting of the Castle. The LPA acknowledges that the Castle's location on a promontory at the head of the harbour, and its scale do make it a visually significant feature in the northern part of the harbour - from the relatively limited locations where views towards it are available from openly accessible public realm. We do not however accept that the Castle dominates the harbour as a <i>whole</i>. Its scale, and the presence of tight grained, large scale urban form along a high proportion of its edge - particularly
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					towards the centre and south of the harbour ensure that the Castle, especially from Portsdown Hill - the only location where panoramic views of the city can be obtained, is certainly not the only feature of obvious note. Whilst it may once have commanded the harbour it cannot reasonably be considered today to fully dominate it in a visual sense. The LPA acknowledges the obvious intervisibility between the Castle and the grade II listed historic magazines at Tipner, and their history as military sites. It does not however consider that they enjoy a meaningful shared relationship in terms of their historic periodisation, or integration into a systematic schema for the defense of the city. It is also notable that whilst the immediate close setting of the Castle itself is largely free of modern development, its more intermediate land based setting has been significantly impacted over time by the 20th Century suburbanization of Portchester to the west, the presence of large industrial sheds (600m to the north), of Port Solent (700m North West), and the landscaped remnants of what was for many decades a municipal tip (c 1 km to the west), Whilst these circumstances do not in and of themselves justify further development within the Castle's setting, they are the de facto reality of its context, and are indicative of the evolutionary and considered change that has responded to the City's needs and would be expected over time. The LPA is aware that the Castle is a Scheduled Monument, as has already been noted in the context of HE's concerns around The Hard and City
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			The flexibility being offered risks harm to heritage assets of high significance (Portchester Castle is a Scheduled Monument and the Church of St Mary's is Grade I) in conflict with the NPPF. Also, it risks internal conflict within the plan (PLP1, PLP3, PLP54, PLP53 and PLP56). We recommend reverting to the area of existing adopted area of opportunity for tall buildings in Tipner.	Centre. The LPA is not required by legislation or policy to limit flexibility here to a point where the possibility of conflict and therefore harm can be entirely avoided or de-risked. The LPA is satisfied that the Plan when considered as a whole, and in particular the design policy PLP 1, site specific policy PLP 3 and heritage policies PLP 53, 54, and 56 do provide for an appropriate level of scrutiny, consideration and safeguarding at the planning application stage. The Church of St Mary (Fratton) is a grade II* listed asset (not grade I as suggested), and is located 1.8 miles South South East of Tipner Point, with dense urban development (including many existing tall and large buildings) separating the two sites. In consequence of this it is realistically considered quite unlikely that any new development at Tipner would be harmful to the setting of the church. Recommendation noted. The current scale of the area of opportunity for Tipner is considered to provide greater scope for a scheme to come forward that could secure a range of benefits including an economically viable solution for the repair, improvement and ongoing maintenance of the group of important grade II listed buildings on the Tipner site. A positive, conservation centric outcome in its own right, and one that is consistent with para. 203 of the NPPF, which makes clear that: 203. In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their
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			Furthermore, when taking stock of our concerns across multiple locations, we assert the need to emphasise design quality for tall buildings, strengthening the point already made in paragraph 3.46. This is particularly important within more sensitive parts of the city. We recommend clarity on the assessments needed to support this process, being explicit about	economic vitality As a corollary to this point, It is notable that HE's focus, particularly on the Castle, does not appear to sufficiently acknowledge or regard either the significance of the Grade II listed magazine complex at Tipner, or the Council's role as owners and stewards of these assets and consequently its priorities for them. The wording of 3.46: which insists on the highest standards of architectural quality, for tall buildings, already places, alongside the extensive range of other sub policies within PLP 1 and the design requirements set out in the Tall Buildings SPD, a very strong emphasis on the need for design quality. The LPA considers the drive for design quality to be relevant and important in the context of all areas and building typologies found in the City. In light of this, the LPA does not consider a revision to the wording of PLP1 3.46 to be necessary The LPA is satisfied that there is already clarity on the assessments required to support tall buildings applications, and these are made explicit through both national and 'local list' application submission requirements - The former requiring the submission of a supporting Design and Access (D&A) Statement - which must explain the design principles and concepts that have been applied to any development proposal. The latter - which makes clear the need for a supporting Heritage Statement (HS) for any application. This must be provided for any application that is adjacent to, or could impact on the setting of a Scheduled Monument, Listed
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		the need for both a heritage statement/heritage impact assessment and landscape & visual impact assessment. These are two separate requirements, which inter-relate.		Building, Conservation Area, Registered Park or Garden or non-designated heritage asset. The content and level of detail for a Statement must be sufficient to understand the potential impact of any proposal on the significance of any affected assets. In addition to a D&A and HS, the supporting Tall Buildings SPD (in particular paragraphs 6.2 -6.48 requires (at 6.2) the submission of a Tall Buildings Statement (TBS) to support the assessment of tall building proposals at the planning application stage. The statement requires an applicant to individually address 16 design related criteria in detail, including at: 6.5 Visual Impact, 6.9 Siting, 6.11 Height, 6.15 Effects on views and vistas, 6.21 Alignment, 6.23 Mass, 6.25 Scale, 6.27 Form, 6.30 Urban grain, 6.33 Streetscape, 6.35 Architectural lighting, 6.37 Public realm, 6.39 Public access, 6.41 Climatic impact, 6.44 Neighborliness and 6.46 Materials. At 6.5 (under visual impact), it requires The submission of Accurate Visual Representations (AVRs) which illustrate the impact of a proposal from: its immediate context, the wider urban context, any important views or vistas which the proposal may affect. Where appropriate, the AVR's must also illustrate the impact of a proposal from a number of 'strategic' viewing points, including the marine approaches to Portsmouth, Portsdown Hill, and Gosport Esplanade. In light of this (already dense and detailed) range of clear submission requirements, the LPA is satisfied that there is both clarity, and sufficient robustness in respect of the assessments required to support the determination of applications relating to tall buildings in the city.
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			We suggest wording for consideration, linked with a new requirement within criterion 7.	7. Development proposals for a tall building(s) will be assessed against the following criteria:... <u>d) Excellence in design for tall buildings is of paramount importance, informed by a heritage statement and landscape and visual impact assessment. The Hard, close to the historic dockyard, Tipner West and Port Solent are especially sensitive locations.</u>	It is not considered necessary or appropriate to identify and list - within policies in the local Plan itself - all of the submission requirements that may relate to heritage and design matters at the subsequent application stage. This would replicate information and details found in the LPA's submission requirements and in principle, could also suggest that all submission requirements, relating to all other possible constraints should also be identified and listed in the Plan itself, an unneeded impetus to provide further avoidable and gratuitous detail and length to what is already a very long document. For the reasons discussed above, the LPA does not consider the addition of an extra sub-criterion (d) to criterion 7 to be necessary. Following a meeting with HE on the 8th November 2024, HE suggested an alternative and briefer possible wording to the new sub-criterion as follows: <i>7. Development proposals for a tall building(s) will be assessed against the following criteria:...</i> <u><i>d) The highest standards of architectural quality are required."</i></u> Upon review, and further discussion with HE, PCC consider that it is justified to maintain a 'parity of esteem' in policy terms in relation to seeking high quality design for all proposals. In light of this, the following amendment to the wording of the policy was proposed by the LPA: <u><i>"7. Development proposals for a tall building(s) must</i></u>
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			The pursuit of high-quality design connects also with the use of a Design Review Panel. In this regard also we recommend strengthening the reference to the need to test concept plans as outlined in paragraph 3.36 on page 20. The current wording provides a weak requirement to engage with the City Council, local community / stakeholders and/or a design review panel. As a final point, paragraph 3.48 refers to 8 areas, but the policy refers only to 7 areas.	<u>be of a high architectural quality and will be assessed against the following criteria..."</u> The LPA does not consider the current wording at para 3.36 (p.20) to provide a weak requirement to engage with the City Council, local community/ stakeholders and/ or design review panel The LPA do not consider that this point goes to the heart of soundness. It is not necessary, and would not be appropriate for the LPA to <i>require</i> as a matter of policy applicants to test concept plans, and engage with the City Council, local community / stakeholders and/or a design review panel. These actions are not required by legislation. No change is considered necessary. PCC agree to suggested change to line one of para PLP 1 3.48, substituting eight for seven: 3.48 The council has identified seven <u>eight</u> areas of opportunity where tall buildings are considered acceptable in principle. Having regard to the points discussed above The LPA consider the approach to identifying areas of opportunity for tall buildings as set out in PLP 1 and its supporting Tall Buildings SPD to be reasonable, adequate and sound. We are satisfied that the background study supporting the policy was informed by a strong consideration of heritage impacts, and existing conservation area appraisals, and provides a reasonable and proportionate evidence base.
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					Tipner is not considered by the LPA to be a location who's existing qualities of place are so distinctive or sensitive that new tall buildings would <i>inevitably</i> cause harm to the setting of either the magazines themselves, or the much more distant Castle - regardless of the perceived quality of their design. Past practice and published guidance confirms that applications for tall buildings are supported by sufficient information to ensure that the impacts of development upon the historic environment can be properly understood (NPPF paragraphs 43 and 194) and dealt with speedily, and in a manner which appropriately safeguards the assets concerned. HE have articulated a position without discussion or consideration of the LPA's definition of a tall building (Tall buildings SPD para 5.1 (p.5): • any building above 5 storeys in height (i.e. 6 storeys or more in height) • any building of 20m or above in height HE have also omitted any commentary around what parameters in terms of issues such as building heights, and siting might make a scheme unacceptable in terms of erosion of the perceived dominance of the Castle. Other factors such as the one mile offset distance between the assets, viewing points, scale and perspective would also be critical to any perceived impacts For all of the above reasons the LPA does not consider it necessary to make changes to PLP 1.
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26 / 27	Core Policy PLP2: Climate emergency	Sound	We support this policy, including its encouragement for reuse of existing buildings and structures.		Comment noted - No action required.
29	Paragraphs 3.70 and 3.71	Comment	We recommend acknowledging the (positive) heritage implications of retaining and reusing historic buildings.		Change Agreed Paragraph 3.70 to be changed as follows: "... Opportunities should be maximised to reuse or recycle materials within the construction process, including the reuse of old buildings <u>historic buildings</u> where appropriate."
31	Table 4.1	Comment	We encourage the local plan to be explicit about the high-level heritage benefits that would be delivered via development of its strategic sites, and exemplify relevant ideas in suggested wording.	Tipner and HIE: • Flood defences • Land decontamination • New bridge • <u>Conservation and reuse of listed buildings and conservation and appreciation of the Scheduled D Day slipways</u> Portsmouth City Centre: • 2.9ha park • 20% Biodiversity Net • Gain at City Centre North	Suggested additions to table 4.1 to be discussed with the planning policy team. GR confirmed he would be happy for such references to be included in the supporting text as an alternative option. PCC agree wording change to Table 4.1, addition of following text against Tipner and HIE: • <u>Conservation of heritage assets</u>



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				Enhanced Culture and Leisure offer, <u>including greater appreciation of the city's heritage</u>	Comment regarding Portsmouth City Centre is noted. The City Centre has 6 listed assets within its boundary. Whilst the LPA acknowledges that greater appreciation of assets here, (or anywhere where they are present, is desirable), the limited number of assets in the center is not considered to justify a change to the wording that makes this explicit here.



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36-39	PLP3: Tipner West and Horsea Island East	Unsound	Currently, there is an in-built conflict in the plan by including almost the entirety of West Tipner as an opportunity area for tall buildings in policy PLP1. This relates to the effectiveness of 2b of PLP3, the basic wording of which we support. While the biggest changes to resolve this relate to PLP1, users of PLP3 need a clearer steer on how to demonstrate compliance with the second half of PLP3 2b, which we suggest becomes a separate paragraph within the policy. In a similar vein, paragraph 4.25 should be split into two, noting the final two sentences that focus on Portchester Castle address an issue entirely different to the D Day slipways. A sensitive response to the significance of Portchester Castle needs to be informed by heritage impact assessment and landscape and visual impact assessment (LVIA). Noting reference is already made in the supporting text to LVIA (in paragraph 4.30) at minimum we suggest a requirement for heritage assessment is added to the supporting text (potentially paragraph 4.25). We note PLP8	In policy PLP3: “b) Break down the barriers, both physical and perceived, created by the M275 motorway and Portsbridge Creek. This will be achieved through the design of both buildings and spaces to create excellent connections with new development at Tipner East and the wider area. [new c] The design, scale and massing of the scheme needs to respond sensitively to the significance of Portchester Castle including its setting, taking into account its dominance in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance;” Also in policy PLP3, we suggest adding a requirement to criterion o): “o) Future development of the site will require land raising and construction of flood defences. Their implementation should be informed by the SFRA Level 1 and 2 <u>and hydrodynamic modelling to ensure changes in water flow do not result in scouring of the Scheduled slipways;</u>” Paragraph 4.25 (second half of this paragraph, which we suggest becomes an independent new paragraph): “The Scheduled Portchester Castle is located approximately one mile to the north west of Tipner peninsula, across the open water of Portsmouth Harbour. Any development proposals for the site should also seek to understand the significance of the Castle and its setting, and where possible respond to the presence of the asset in terms of	PCC agree to split second half of criterion PLP3 2b into a new policy criterion, with slightly adapted wording [new c] The design, scale and massing of the scheme needs to respond sensitively to the significance of Portchester Castle including its setting, taking into account its <u>prominence</u> dominance in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance;” Change to policy wording is not accepted. But change to supporting text agreed at 4.27 (see below) Upon further review, PCC deemed it not necessary to make the second part of paragraph 4.25 a new paragraph. Upon further review, PCC deemed it not necessary to delete 'where possible' in paragraph 4.25.
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			includes a requirement for a heritage statement, indicating precedence with the plan for such a requirement in policy.	impact on views both from, and towards the Castle. <u>This needs to be assessed through heritage impact assessment.</u> "	In regards to the proposed amendment to paragraph 4.25, to add requirement for Heritage Impact Assessment, a Heritage Statement would already be required at the submission stage. In light of this, the LPA do not consider a change of wording necessary here.
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			An additional heritage concern relates to the potential for unintended consequences from any increase in land mass through reclamation and/or any associated flood defence measures or dredging. Such actions have the potential to cause funnelling of water that results in a scouring effect on the designated D-Day Slipways. This needs further investigation through coastal hydrodynamic modelling to understand potential water behaviour scenarios, their impacts on coastal structures and options for erosion management. We suggest an amendment to criterion o) that would address this point. This could usefully be explained through relevant supporting text. We support the wording of criterion 3.	PCC agree to change paragraph 4.27 with the addition of the following text: 4.27..... This should be informed by the SFRA level 1 and 2 and must incorporate detailed site specific wave overtopping calculations along with suitable calculations for freeboard <u>Regard should also be had to the potential impact of any new flood defences on the nearby designated D-day slipways, through scouring caused by the funneling of water. Addressing this may require further investigation through coastal hydrodynamic modelling to better understand potential water behaviour scenarios, and their impacts on coastal structures and options for erosion management.</u> Following review, HE welcomed the proposed new text to paragraph 4,27, and the acknowledgement of the need for hydrodynamic modelling. but still retained concerns. HE proposed the following additional changes to paragraph 4.27 “Regard should also be had to the potential impact of any new flood defences, <u>land reclamation and bridge design</u> on the nearby designated D-day slipways, through scouring caused by the funneling of water. Addressing this <u>will may</u> require further investigation through coastal hydrodynamic modelling to better understand potential water behaviour scenarios, and their impacts on coastal structures and options for erosion management. <u>Impacts should be mitigated by design.</u>” HE also reiterated an amendment to criterion O to reflect the need for hydrodynamic modelling:



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					o) Future development of the site will require land raising and construction of flood defences. Their implementation should be informed by the SFRA Level 1 and 2 <u>and hydrodynamic modelling.</u>“ PCC agreed to accept the above changes, apart from the following: '<u>Impacts should be mitigated by design</u>' as this requirement would be addressed at the application stage under the very detailed new Design Policy (PLP1). The addition of '<u>and other appropriate mitigation measures</u>' has also been proposed to be included at the end of the new text added to paragraph 4.27. Support noted.
60-64	Strategic Site Allocation Policy PLP6: Portsmouth City Centre and its supporting text	Unsound	Criterion 2j on design merits revision to connect with what is already stated in paragraph 3.30 as part of the Council's Development Strategy. We suggest revised wording for consideration. In our response at Regulation 18 we expressed concern that the proposed zones were relatively large, and flagged benefit from a more detailed set of site allocations. We reinforced this concern through informal comments in late 2023. While we retain concerns about the high-level nature of the proposed approach, heritage considerations are integrated within most of the	In policy PLP6: “j) Major development in the City Centre should demonstrate how its design enhances the centre's appearance, <u>responds positively to its heritage significance</u> and considers the needs and safety of all its users including reducing crime, through the provision of a design code;” Criterion 4 of policy PLP6 requires editing informed by proportionate heritage impact assessment. In the supporting text: “4.105 A substantial new green space will create a new link between St Agatha's and All Saints Churches”	Change agreed PCC agree to accept proposed changes to criterion 2j of policy PLP6 and also the supporting text (paragraph 4.105). Editing to criterion 4 to reference heritage impact assessments not considered necessary. Any proposal that impacted on the setting of any heritage assets would be required by the LPA's submission requirements, to submit a Heritage Statement.



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			areas identified in PLP6, which is welcome.	Following further review and discussions with HE, PCC agreed to amend criterion 4 of policy PLP6. Please see below: 4. "Proposals falling within the City Centre Commercial Area (as shown in figure 4.5) should include town centre uses at ground floor level. Proposals which retain and enhance active frontages in this area including outside / street seating will be supported. Outside of the commercial frontages schemes that deliver high-density mixed-use development will be permitted provided they improve connectivity between the retail area, and the surrounding areas and contribute to a modal shift to sustainable transport. Proposals within this area should provide space to accommodate and avoid negative impact on the markets which use Commercial Road. Interventions at the Arundel Street Focal Point should protect and enhance the fountain and take opportunities to utilise the space for cultural events. <u>Development proposals within the area should also avoid unacceptable harm to the significance of designated heritage assets within the area.</u>" The following amendment(s) have also been proposed to the supporting text (paragraph 4.111): 4.111 "Within the City Centre Commercial Area there are two listed buildings namely St Agatha's and All Saints Churches <u>four Grade II listed buildings (105 Commercial Road, 116/118 Commercial Road, Trafalgar House and Connaught Drill Hall), and a range of other handsome buildings and features of interest.</u> Proposals for redevelopment within this area must retain these buildings and respond to sympathetically to their settings. The southern portion of the area borders the Guildhall & Victoria
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					<i>Park Conservation Area and proposals on adjoining sites should respond sympathetically to the park and the Cathedral."</i>
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			The main point where they are absent is in the Commercial area (also see below), which results in criterion 4 missing important connections with the area's history. This is a missed opportunity and unsound (not justified and in conflict with national policy). Heritage impact assessment is needed to provide the evidence that informs the approach taken. In the supporting text, "Church" should be "Churches" in paragraph 4.105 and the references in paragraph 4.111 to two churches surely relates to City Centre North and <u>not</u> to the Commercial Road area? I believe the Council's Commercial area includes four Grade II listed buildings (105 Commercial Road, 116 and 118 Commercial Road, Trafalgar House and Connaught Drill Hall). Also, it includes other handsome buildings (e.g. 107 Commercial Road) and features of interest such as the Jubilee Fountain (which we note is mentioned in criterion 4). There is significant use of high- quality materials such as Portland Stone. The character of this area is intimately	Paragraph 4.111 merits editing informed by proportionate heritage impact assessment.	Editing not considered necessary. Any proposal that impacted on the setting of any heritage assets would be required by the LPA's submission requirements, to submit a Heritage Statement Comments noted An absence of discussion on this point in the Plan



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			bound up with the Portsmouth story. But the local plan does not seem to connect with this heritage. It appears not to be fully understood or appreciated, thus hampering positive heritage planning for the site's future. Heritage impact assessment is essential to inform the supporting text and the policy.		does not mean that the LPA does not understand or appreciate the significance or quality of the designated heritage assets or other buildings present in the south of the commercial area. It is not considered that absence of this within the plan itself would necessarily hamper positive heritage planning for the site's future. Suggested change not considered necessary The LPA does not consider a Heritage Impact Assessment of the commercial area to be essential or necessary at the plan making stage. We are very concerned that in the absence of any real world proposals for the area, such an exercise would not only be unjustifiable in terms of resourcing, and parity - in terms of the absence of such an exercise in other areas/ designations, but also wholly speculative, and therefore lacking in certainty or meaning at the plan making stage Any proposal that impacted on the setting of any heritage assets would be required by the LPA's submission requirements, to submit a Heritage Statement at the point of application.
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77 - 79	Strategic Site Allocation Policy PLP8: St James' & Langstone Campus	Comment	We support the broad thrust of the policy and suggest minor improvements to criterion a) in the policy wording.	"a) Retain, and conserve the significance and setting of St James' Hospital (Grade II listed), and the Chapel (Grade II listed), and all other heritage assets in the hospital grounds and conserve or enhance their significance (including their setting); b) All proposed developments must be accompanied by a heritage statement;"	PCC agreed to accept the suggested change to criterion 2a of Policy PLP8.
94 - 95	Site Allocation Policy PLP10: Land West of Portsdown Technology Park and its supporting text	Unsound	For completeness it is important to recognise that this Fort Southwick is also a Grade I listed building, connecting also with the Council's legal duty under the Planning (Listed Buildings and Conservation Areas) Act 1990. Furthermore, proportionate heritage impact assessment would be beneficial to inform the approach to heights and massing on this site.	"i) Any new build development proposals for the site will respond positively to the presence of the following heritage assets: i. Fort Southwick (Scheduled Monument <u>and Grade I Listed Building</u>) and its setting; and ii. Any undesignated heritage assets within the site." "5.11 There are a number of important heritage and nature conservation designations in close proximity to the site. The Scheduled Monument of Fort Southwick, <u>which is also a Grade I listed building</u> , is immediately adjacent to the western boundary whilst archaeological finds in the area date back to the Bronze..." "5.17 The site is located adjacent to Fort Southwick, which is a Scheduled Monument <u>and Grade I listed building</u> built (c.1860) as part of the Palmerston Portsmouth defences. The site has some archaeological potential for prehistoric and/or Roman remains with evidence of barrows and enclosures."	PCC agree to accept suggested changes to criterion 2i. for Policy PLP10 PCC agree to accept the suggested changes to paragraphs 5.11 and 5.17.



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96 - 102	Site Allocation Policy PLP11: Port Solent and its supporting text	Unsound	Consideration needs to be given to avoiding and minimising harm to the significance of Portchester Castle, in accordance with national policy. This relates to more than visual inter-visibility. Wording from PLP3 may help to embed a consistent approach on this issue, as suggested.	In policy PLP11: “O) Protect viewpoints and the wider visual impact across Portsmouth Harbour, including the impact on Portchester Castle. <u>The design, scale and massing of the scheme needs to respond sensitively to the significance of Portchester Castle including its setting, taking into account its dominance in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance</u> ”	PCC agree to accept the suggested changes to criterion 2.O for Policy PLP11, (with one minor amendment: <u>The design, scale and massing of the scheme needs to respond sensitively to the significance of Portchester Castle including its setting, taking into account its presence dominance in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance</u> ”
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			We note the requirement for LVIA is mentioned in supporting text rather than in policy (as required in PLP8 and PLP10). A requirement for a heritage statement also needs to be stated, at minimum in the supporting text.	In the supporting text: "5.39 The site also offers the potential for views out over Portsmouth Harbour and towards Porchester Castle. Where these views are currently achievable from public viewpoints all effort should be made to protect these. The application should be supported by a Landscape and Visual Impact Assessment to show how key viewpoints have been taken into consideration. This includes the protection of wider views, towards the site including from Porchester Castle and other key landmarks. <u>Any development proposals for the site should seek to understand the heritage significance of the Castle and its setting, through heritage impact assessment, and the scheme design respond sensitively to that significance.</u> "	Suggested change not agreed The LPA's application validation submission requirements, require a Heritage Statement to be provided for any proposals affecting the setting of a Scheduled Monument, which would apply at Port Solent. In light of this, the LPA does not consider it necessary to amend the wording of the supporting text at paragraph 5.39
104 - 105	Site Allocation Policy PLP12: St John's College	Comment	We support the policy and suggest a minor amendment to ensure clarity in the intention to connect with all heritage assets, not just those of historic asset (e.g. at the exclusion of archaeological assets)	"2 b) Retain, restore, and where possible enhance the fabric and setting(s) of any historic <u>heritage</u> assets on the site, as shown in figure 5.4;"	PCC agree to accept the suggested changes to criterion 2b for Policy PLP12.
107 - 112	Site Allocation Policy PLP13: Fraser Range and its supporting text	Unsound	We assert that this policy is unsound principally due to what may be typographical error. Fort Cumberland is Grade II* Listed Building, not Grade II. Also, we note 2f should refer to Scheduled Monuments not Scheduled Ancient Monuments, thus aligning with national policy.	"f) Any new build development proposals for the site must respond positively to the presence of the following heritage assets: i. Fort Cumberland (Scheduled Ancient Monument and Grade II* listed); ii. World War II Anti Tank Defences (Grade II listed); and iii. Any undesignated heritage assets within the Range site including where possible the remains of any gun emplacements on the eastern part of	PCC happy to accept the suggested changes to criterion 2f i for Policy PLP13, and to update paragraph 5.57 to reflect the grant of planning permission at this site. -



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			Paragraph 5.57 suggests updating is needed.	the site that shall be retained and their significance and setting conserved.”	
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Page	Section	Sound/ Unsound	Comments	Suggested Change	LPA's position on Comments and suggested changes
112 - 117	Site Allocation Policy PLP14: The News Centre, Hilsea and its supporting text	Unsound	Policy PLP14 needs to refer to the setting of nearby heritage assets. Also, in the supporting text, paragraph 5.76 should make explicit that Hilsea Lines is a Scheduled Monument. Proportionate heritage impact assessment would be beneficial at this stage to inform the policy approach.	“3 c) The design of the site should seek to respond to and celebrate distinct elements of the original building's historic presence and architecture <u>and respect the setting of nearby heritage assets;</u>” “5.76 Historic Environment Records show close proximity of the site to a number of sensitive archaeological and historic assets, including the Hilsea Lines <u>Scheduled Monument</u> and a number of Listed Buildings. The setting of these assets should be considered as part of the design of any development of the site.”	Suggested change accepted Changes to criterion 3c for Policy PLP14 accepted as follows: The design of the site should seek to respond to and celebrate distinct elements of the original building's historic presence and architecture; <u>while respecting the setting of nearby heritage assets.</u> Suggested change to paragraph 5.76. accepted
117 - 121	Site Allocation Policy PLP15: Somers Orchard	Unsound	The final line of paragraph 5.90 suggests updating is needed. Historic England objects to criterion 2f of the policy which requires “tall buildings and high density blocks”. There are various ways to achieve high density, which do not all require tall buildings. The site lies <u>outside</u> the Council's proposed opportunities area for tall buildings (thus the proposed policy approach would conflict with PLP1), and rightly so, as it lies immediately between two conservation areas – The Terraces and King Street – the character of both potentially	In the policy: “2 f) Includes tall buildings and high density blocks in order to achieve the densities needed to meet the required level of housing;”	Suggested change not accepted PCC highlighted that the planning application for Somers Orchard has recently been approved (subject to S106 agreement and conditions), which includes 'tall buildings.' Therefore, removal of reference would not be appropriate.



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			harmed by a blanket requirement for tall buildings.		
143/ 144	Strategic Policy PLP20: Houses in Multiple Occupation	Unsound	Heritage significance of the building needs to be a consideration to represent a sound approach that aligns with national policy on the protection of the historic environment. We would prefer recognition in the policy (such as amending criterion c); but at minimum we assert that heritage significance needs to be recognised in supporting text, with a suitable link to the heritage policies of the plan. Cross-reference to chapter 11 is merited.		Amendment to criterion C not supported HMO applications do not typically lead to external changes to buildings, however where this would be the case, and an application site were subject to any heritage designation(s), the relevant heritage related policies would apply - thus affording an appropriate level of protection to the historic environment. The Plan and its policies should be read holistically. The LPA consider that any linkages between PLP 20 and other heritage policies in Chapter 11, do not need to be explicitly made here either in the policy, or its supporting text in order for the plan to considered sound.



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150 / 151	Area Allocation Policy PLP23: Estate Renewal	Unsound	The policy makes no reference to the historic environment, yet estate renewal areas intersect with heritage assets, such as the Portsea conservation area, HM Naval Base and St George Square conservation area, King Street conservation area and Mile End Conservation Area. While we support estates renewal, this needs to be done in a way that is informed by the historic environment. Cross-reference to chapter 11 is merited in the supporting text.	g) Deliver high quality design and sustainability, taking into account any relevant design guidance or codes <u>and the significance and character of any affected heritage assets.</u>	Comment and suggested change noted Change to policy wording not agreed As above The Plan and its policies should be read holistically. The LPA consider that where there might be any heritage assets within, or in the setting of any area of estate renewal relevant heritage related policies would apply - thus affording an appropriate level of protection to the historic environment. Any linkages between PLP 20 and The heritage policies in Chapter 11, do not need to be explicitly made here either in the policy, or its supporting text in order for the plan to considered sound.
166	Development Management Policy PLP27: Employability & Skills	Comment	The supporting text provides an opportunity to promote the heritage skills sector, potentially making a link to the Council's Heritage Strategy and recognizing & responding to the city's maritime heritage.		Comment noted - No change to policy wording During initial discussion between HE and the LPA (12 + 13.09.24), HE agreed that it was not necessary to agree or make amendments/ changes to text where comments (without suggested changes) had been provided by HE. The comment does not explicitly seek or identify an amendment to the wording of the policy or its supporting text. In light of this, comments are noted, but the LPA will not change the text.



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170	Table 7.2	Comment	The entry on Commercial Road needs to connect with the area's character and heritage, informed by the heritage impact assessment suggested above.		During initial discussion between HE and the LPA (12 + 13.09.24), HE agreed that it was not necessary to agree or make amendments/ changes to text where comments (without suggested changes) had been provided by HE. The comment does not explicitly seek or identify an amendment to the wording of the policy or its supporting text. In light of this, comments are noted, but the LPA will not change the text.
176 - 181	Strategic Policy PLP30: Cultural and Visitor Economy	Sound	We welcome the recognition given to heritage in this section of the plan.		No action required.
185 / 186	Strategic Policy PLP31: Flooding	Comment	We highlight the importance of flooding as an issue for the historic environment. Flood risk measures help to protect designated and non-designated heritage assets. Also, as acknowledged by criterion 1g) of the policy, flood prevention measures need to be sensitive to their surroundings. From a heritage perspective, this means not causing unacceptable harm to the setting of heritage assets or indeed the fabric of heritage assets. We recommend the addition of text on these concerns and would be happy to comment on any draft text emerging.		Comment noted - No change During initial discussion between HE and the LPA (12 + 13.09.24), HE agreed that it was not necessary to agree or make amendments/ changes to text where comments (without suggested changes) had been provided by HE. The comment does not explicitly seek or identify an amendment to the wording of the policy or its supporting text. Policy 1 g), and Para 8.20, (as worded) both make clear a requirement for flood prevention measures to be sensitively incorporated, taking into consideration character, and landscape of an area The policy is deliberately high level to explicitly



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				avoid the need to identify any and all constraints that it <i>may</i> be necessary to consider at the application stage. In light of this, comments are noted, but the LPA considers it is not necessary to change the text.
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Page	Section	Sound/ Unsound	Comments	Suggested Change	LPA's position on Comments and suggested changes
	and its supporting text				
193	New paragraph 8.52	Comment	Might a new paragraph be added before the current paragraph 8.52, focusing on the implications of paragraph 8.51 regarding embodied carbon i.e. there is a significant amount of embodied carbon in the city's current building stock, elevating the importance of the Council's approach in favour of building retention.		Comment noted - No change considered necessary The LPA consider that this point is covered by PLP 33 Paragraph 4:....."The retention of existing buildings will be given preference to the demolition and replacement of existing buildings....
194	Development Management Policy PLP33: Sustainable Construction and Onsite Renewable Energy and its supporting text	Comment	We support this section and in particular the policy's support for retaining existing buildings where possible. That said, to avoid conflict with policy PLP53 (criterion 7) at minimum we suggest cross-referring to the section of the plan that focuses on the historic environment and acknowledging that the retrofit of traditionally constructed buildings requires a different approach. Cross-reference to chapter 11 is merited.		Comment noted - no change considered necessary The Plan and its policies should be read holistically. The LPA do not consider that incorporating a cross reference to LP 53 is necessary here in order to make the Plan sound.
197	Paragraph 8.67	Comment	We note that the 2010 study does not appear to consider the historic environment.		Comment noted - No change considered necessary PCC do not consider that any action is required. The study was conducted in 2010.



198	Development Management Policy PLP34: Renewable Energy	Unsound	The sensitive receptors that need to be considered, and addressed in policy terms, include heritage. We suggest additional wording to be added to criterion 1. We are taking the liberty of assuming the natural environment should also be referenced. Cross-reference to chapter 11 is merited in the supporting text.	“1. Development proposals for wind turbines and solar photovoltaic arrays will be supported in principle at appropriate locations subject to it being demonstrated that there are no adverse impacts (or that they can be made acceptable) on living conditions including those from vibration, noise, shadow flicker, glint, glare and air quality <u>and taking into account impacts on the natural and historic environment.</u> ”	Comment and suggested amendment noted. No change considered necessary. Any impacts on the historic environment would be understood through a Heritage Statement and taken in to account at the application stage The LPA do not consider any change to either the Policy, or its supporting text necessary, in order to make the plan sound.
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			Also, we query what is meant by "this will be identified as a preferred location for that technology" in criterion 3. How will this be identified? We support community energy, but we are concerned that the wording of criterion 3 is too open to interpretation, which could undermine its effectiveness.		Comment noted.
199	Paragraph 8.73	Comment	While reference is made to indirect as well as direct impacts, we assert that reference needs to be made to the setting of heritage assets, at least in the supporting text. We suggest wording for consideration. The route through which potential impacts are assessed from a heritage perspective is heritage impact assessment. It would help to state this explicitly.	"The City has areas which are covered by a variety of designations for ecology, historic and landscape reasons. Solar photovoltaic array and wind turbine proposals will therefore need to ensure that there will be no direct or indirect adverse impacts upon these designated sites and assets, or that those impacts can be made acceptable. <u>From a heritage perspective, potential impacts are assessed through heritage impact assessment, which includes consideration of any impacts on the setting of heritage assets. This is complemented by landscape and visual impact assessment.</u> In addition, the impact of development on the amenity of..."	Comment noted - no change considered necessary A Heritage Statement would be required in any event.
204	Development Management Policy PLP36: Coastal Zone and its supporting text	Unsound	This policy needs to recognise the highly designated nature of the Portsmouth coastline from a heritage perspective, justified appropriately. We suggest potential wording in the policy and encourage the drafting of relevant supporting text. Cross-reference to chapter 11 is merited in the supporting text.	1. Development proposals in the Coastal Zone, as defined on the Policies Map, will be permitted where they:... c) Conserve and enhance the character of the Coastal Zone, <u>taking account of the contribution made designated and non-designated heritage assets;</u>"	Comment noted - no change considered necessary This is not a heritage led policy, and the Plan must be considered holistically. No change is considered necessary



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207	Paragraphs 9.7 – 9.10	Comment	When describing the benefits of green spaces in cities, we believe the plan should also recognise that the natural environment and the historic environment are integral to each other. An integrated approach, such as that promoted by Historic England, Natural England and the National Lottery Heritage Fund in its joint statement (https://historicengland.org.uk/content/docs/advice/joint-statement-naturalengland-historicengland-nlhf/), has the potential to deliver multiple benefits.		Comment noted - no change considered necessary



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209-213	Strategic Policy PLP38: Green Infrastructure and its supporting text	Comment	Building on an initial reference to the interaction between the natural and historic environments, the GI background paper acknowledges that many of Portsmouth's green open spaces also play an important heritage role. We encourage the Council to refer explicitly to a couple of examples relevant to Portsmouth: Hilsea Lines and Southsea Common.		Comment noted - no change considered necessary
217 / 218	Strategic Policy PLP39: Biodiversity and its supporting text	Comment	Adding to the text (paragraphs 9.54 and 9.55) that supports implementation of policy PLP39, we highlight that newly created or altered habitats will sit within a historical landscape and may have both positive and negative impacts on setting as well as physical and chemical conditions of heritage assets.		Comment noted - no change considered necessary
237 / 238	Development Management Policy PLP46: Local Green Spaces	Comment	We highlight the importance of recognising explicitly in the text some of the local green spaces are also designated for their heritage significance. The natural environment and historic environment are integral to each other, as picked up in our comments elsewhere. This provides an opportunity to cross-refer to the heritage section of the plan.		Comment noted - no change considered necessary
239	Paragraph 10.2	Comment	We miss reference to cultural infrastructure, which is referenced in the NPPF paragraph 20. We assert that this includes the city's heritage assets and encourage the inclusion of a suitable reference to cultural infrastructure in this paragraph.		Comment noted - no change considered necessary
248	Paragraph 10.48	Comment	This section of the plan seems currently to be missing acknowledgement of the contribution made by the historic environment to the public realm. This could be made explicit in perhaps an expanded paragraph 10.48. We encourage reference to Historic England's "Streets for All" guidance: https://historicengland.org.uk/images-books/publications/streets-for-all/		During initial discussion between HE and the LPA (12 + 13.09.24), HE agreed that it was not necessary to agree or make amendments/ changes to text where comments (without suggested changes) had been provided by HE. The comment does not explicitly seek or identify



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				an amendment to the wording of the policy or its supporting text. The intent and emphasis of this policy is to seek opportunities to enhance public realm, rather than to highlight the relationship between public realm and heritage, that may be found for example in a Conservation Area or Listed Park. In this context, the LPA considers the wording of PLP 49 1 a) to satisfactorily address the need for any public realm works to positively address heritage significance In light of this, comments are noted, but the LPA considers it is not necessary to change the text.
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Page	Section	Sound/ Unsound	Comments	Suggested Change	LPA's position on Comments and suggested changes
252	Paragraph 10.67	Comment	NPPF paragraph 20 advises that: "Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for: ... c) community facilities (such as health, education and cultural infrastructure); ... " We consider cultural infrastructure to include all heritage assets within Portsmouth. The importance of cultural infrastructure to the character, authenticity, creativity and general attractiveness is widely and increasingly recognised, as is the importance of cultural infrastructure to economic activity and the health and wellbeing of communities (including elsewhere in the plan). It would be reasonable to expect the Council's approach to aim at least to maintain existing levels of cultural assets that exist within the district, and to seek improvements to secure the long term future of assets classed as 'at risk'. Currently there are 16 designated heritage assets on the national Heritage at Risk Register. We suggest one way	"In assessing the necessary provision or contribution, priority consideration should be given to any specific deficits or impacts identified, for the following types of infrastructure, as appropriate: • Transport (to include electric vehicle charging infrastructure) • Flood Risk Management Infrastructure • Education • Healthcare • Green Infrastructure • Recreational Facilities • Community Safety Facilities • <u>Heritage at risk</u>"	Comment noted - change not considered necessary The LPA consider that the point(s) which this suggested amendment is intended to address, is appropriately dealt with under Policy PLP 53 (Historic Environment) (4), which states: "Development proposals that would improve the condition of heritage assets that are considered to be 'at risk' through neglect, decay or other threats will be encouraged and supported. Where appropriate the Council will seek positive conservation centric solutions for these assets through engagement with owners and as a last resort may consider the possible use of statutory powers to help achieve these objectives". In light of this, comments, and suggested changes area noted, but the LPA considers it is not necessary to change the text.



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			of recognising this via specific reference to heritage at risk in paragraph 10.67.		
258	Table 11.1	Comment	I'd suggest referring to heritage assets rather than historic assets, to align with the NPPF's terminology.		Change agreed Wording of caption to table 11.1 to be changed as follows: Table 11.1: <u>Heritage</u> Historic assets in Portsmouth
259	Suggested new paragraph 11.6	Comment	We recommend adding a new paragraph before paragraph 11.6 that flags the connections between the strategic historic environment policy and the objective of being a healthy and happy city. The city's heritage is part of what contributes to local wellbeing.		Comment noted - change not considered necessary



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260 / 261	Strategic Policy PLP53: Historic Environment	Sound			No action required.
262	Paragraph 11.18	Comment	At risk assets include more than just the assets identified by Historic England. As acknowledged in the Council's emerging Heritage Strategy, we encourage local authorities to produce their own at risk registers, to support the identification of assets for regeneration and enhancement. The Council's Strategy states: "This is an area that may need to be taken forward to support prioritisation, particularly in the context of constrained resources." We flag this provides a good opportunity to reference the Heritage Strategy, which is otherwise not mentioned in this section of the local plan, a surprising and disappointing omission. The two should be firmly connected. We strongly recommend adding more detail here on heritage at risk and introducing the Heritage Strategy with the plan's chapter on the historic environment.		Comment noted - no change considered necessary The LPA is aware that assets that are considered to be 'at risk' can extend beyond those identified by HE themselves, and that HE also encourage LPA's to produce their own 'At Risk' registers. We do not consider that the absence of a reference to the Council's Heritage Strategy makes the plan unsound.
263	Paragraph 11.25 and 11.26	Comment	As an incidental point, note there is a typo in paragraph 11.25: "t is incorrect" More substantive is suggested edits to paragraph 11.26, to reinforce the need for heritage expertise to inform the decisions made and refer to harm rather than impacts (the latter could be positive).	"Where a proposal related to the improvement of an asset's energy efficiency is considered necessary, and would require Planning Permission and/ or Listed Building Consent, technologies/ solutions that minimise and or mitigate any potential <u>harm impacts</u> should be prioritised. Typically, this requires heritage expertise to inform the decisions taken."	Typo noted and change agreed for paragraph 11.25 (line 9).....It is incorrect.... Change to supporting text agreed for PLP53 paragraph 11.26: "Where a proposal related to the improvement of an asset's energy efficiency is considered necessary, and would require Planning Permission and/ or Listed Building Consent, technologies/ solutions that minimise and or mitigate any potential <u>harm impacts</u> should be prioritised. Typically, this requires heritage expertise to inform the decisions taken."



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264	Development Management Policy PLP54: Listed Buildings	Comment	Criterion 1a) may unintentionally constrain delivery of enhancements, by focusing solely on how loss can be avoided as a way of demonstrating compliance. This merits alteration. We suggest possible wording.	“They preserve or enhance the significance of the listed building and its setting by demonstrating <u>how significance is better revealed and/or how</u> that loss of historic fabric and detail of significance, including internal features, floor plans and the integrity of the rooms, is avoided”	Change agreed PLP54 criterion 1a: “They preserve or enhance the significance of the listed building and its setting by demonstrating <u>how significance is better revealed and/or how</u> that loss of historic fabric and detail of significance, including internal features, floor plans and the integrity of the rooms, is avoided”
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Page	Section	Sound/ Unsound	Comments	Suggested Change	LPA's position on Comments and suggested changes
264	Paragraph 11.30	Comment	The absence of a conservation area appraisal for Conservation Area number 22: HM Naval Base and St George's Square is a notable concern. We encourage the Council to be open about this in its local plan and commit to preparing such an appraisal as a high priority, explaining why this matters.		Comment noted - No change considered necessary This is an operational matter for the LPA.
264 / 265	Development Management Policy PLP55: Conservation Areas	Sound			No action necessary.
266	Development Management Policy PLP56: Archaeology	Sound			No action necessary.
289 / 290	Monitoring	Comment	Acknowledging the intended focus of the Council's heritage monitoring on the production of Conservation Area Appraisal production, we recommend adding explicit reference to 22: HM Naval Base and St George's Square as a high priority. Also, we recommended including a monitoring indicator linked with heritage at risk.		Comment noted - no change considered necessary The LPA's monitoring of policy 55 (Conservation Areas) sets out an intention to review one existing Conservation Area Appraisal and Management Guideline document per annum. The current focus and priority is a review of the appraisal document for the Hilsea Lines (for training purposes). Going forward, any subsequent priorities will be an operational matter for the LPA (based at least in part on resourcing and capacity).



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**Appendix D - e-mail correspondence between PCC and HE
(08/11/24, 22/11/24 and 28/11/24)**

From: [Robinson, Guy](#)
To: [Murray, Polly](#); [Cracknell, Ben](#)
Cc: [Howard, Lucy](#)
Subject: RE: Portsmouth LP: informing a SoCG
Date: 28 November 2024 16:38:11

- Official -

Dear Polly and Ben

Thank you once again for your email Polly. To dive straight in...

We warmly welcome the proposed commitment in policy **PLP1** that development proposals for a tall building(s) must be of a high architectural quality. While I appreciate that high standards may be sought for all development proposals, tall buildings have the potential to have a greater impact (for positive or negative, as acknowledged in para 3.45) due to their scale, and I maintain the value in emphasising the importance of quality in their design.

To reiterate a point I have made already, my view is that there is considerable merit in articulating how the Council will assess proposals for tall buildings in its local plan, beyond simply referring to the Tall Buildings SPD in the policy and a related footnote. This is especially important given the opportunity areas for tall buildings cover sizeable parts of the city, and – as Ben you’ve said – tall buildings are permissible outside those areas. I see only benefits in making clear what the Council will expect. That being so, and picking up language from paragraphs 6.1 and 6.2 in the SPD, please would the Council consider expanding footnote 35 to state:

“In order to assess the suitability of proposals for new or replacement tall buildings, the applicant will be required to submit a Tall Buildings Statement, which should satisfactorily respond to all criteria in its Tall Buildings SPD (or future equivalent):
<https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-buildings-tall-buildings-spd.pdf>”.

I intend to recommend that we accept the compromise position you outline regarding **PLP3**.

Regarding **PLP6**, I must be open, I am disappointed. The wording proposed for PLP6 does little to conserve or enhance value the area’s historic environment. Seeking to avoid unacceptable harm to designated heritage assets is setting the bar at quite a low level and arguably sends a different message to the proposed supporting text of retaining those buildings and responding sympathetically to their setting. I recognise part of the challenge – as you have said Ben – is that this is not a conservation area, though the Historic Places Panel recommended that it be considered for such designation; and the buildings of historic or architectural interest which are not listed, are not locally listed. And I appreciate the Council is looking for maximum flexibility to deliver its other aims in this part of the city. Taking all these points together, I put forward two ideas for consideration:

- A. If Historic England were to come up with some funding, would the Council be open to a discussion about a study on the heritage significance of this area?
- B. Meanwhile, would the Council consider minor modification to the wording proposed for PLP6 along the following lines: “Development proposals within the area should also

~~respond sympathetically avoid unacceptable harm~~ to the significance of designated heritage assets within the area."

Polly, I realise you have said that further changes are not going to be possible. However, my hope is adding a line to an existing footnote, and amending a few words within one line of PLP6, may be considered. Please I would greatly appreciate any such consideration.

We are taking important steps towards reaching a position where the Statement of Common Ground can propose a way forward that would avoid Historic England objecting to the plan (as proposed to be modified). This is great and I am hugely grateful to you both. I copy in Lucy in case that is helpful in expediting any related discussion.

Best wishes

Guy

Guy Robinson, BSc, MRTPI

Historic Environment Planning Adviser

Development Advice – London and South East Region (Berkshire, Buckinghamshire, Hampshire, Isle of Wight & Oxfordshire), Historic England



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From: Murray, Polly [REDACTED]

Sent: Friday, November 22, 2024 4:24 PM

To: Robinson, Guy <G [REDACTED]>

Cc: Cracknell, Ben [REDACTED]

Subject: RE: Portsmouth LP: informing a SoCG

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

- Official -

Dear Guy,

Hope you're well, and apologies for the delayed response. Thank-you for your time earlier

this month to discuss our response(s) to HE's Reg 19 response. We found it very useful to go through any outstanding matters, and how this may form the basis of a SoCG between us.

Thank-you for providing the below additional comments in regards to PLP1, PLP3 and PLP6. Ben and I have reviewed, and provided our response(s) in **green** below:

PLP1: Design

- There is a high level change that I think would go some way to reducing our concerns about criterion 7 of this policy. In essence this would be to elevate the power of what is already in paragraph 3.46 of the plan and connect with the point I raised at Reg 19 about design excellence. **Would the Council consider adding a new sub-criterion d) for criterion 7 along the following lines?**

"d) The highest standards of architectural quality are required."

- I need to confer with colleagues about the Tipner West opportunity area. The fact that the policy does support for tall buildings across the whole of Tipner West and a heritage/setting assessment has yet to be done does raise the risk of harm to the setting of Castle. We need to reflect on the degree to which we feel the plan manages that risk & the evidence base supports the expanded area. **I will report back on our further reflections next week.**

We acknowledge your comments in regards to criterion 7 of PLP1. Further to our discussion with you and subsequent engagement with our Policy Team Leader, the Council has now settled on the following wording for this policy. Please see below:

"7. Development proposals for a tall building(s) must be of a high architectural quality and will be assessed against the following criteria..."

As Ben raised in our conversation with yourself, the first paragraphs of PLP 1 address the LPA's approach to quality, and ultimately the LPA are keen to ensure that there is effectively a 'parity of esteem'/ value when the impact and acceptability of any proposals for all development/scales are considered.

PLP3: Tipner West & Horsea Island East

- I welcome your agreement to acknowledge the need for hydrodynamic modelling. That said, we are not quite there in terms of resolving our concerns.
- We assert that such modelling will be required rather than "may".
- Furthermore, in our response we referred also to land reclamation having the potential to impact on water flow and the potential for scouring. For completeness, bridge design also has the potential to impact on this issue. Taken as a whole, we put forward the following changes to supporting text for consideration:

"Regard should also be had to the potential impact of any new flood defences, land

[reclamation and bridge design](#) on the nearby designated D-day slipways, through scouring caused by the funneling of water. Addressing this ~~will~~ ~~may~~ require further investigation through coastal hydrodynamic modelling to better understand potential water behaviour scenarios, and their impacts on coastal structures and options for erosion management. [Impacts should be mitigated by design.](#)”

- Beyond this detailed supporting text, we assert that a high level hook for hydrodynamic modelling in the policy itself is merited. I am not confident that we would agree to this matter only being referenced in supporting text. To exemplify one way this could be address in policy:

“o) Future development of the site will require land raising and construction of flood defences. Their implementation should be informed by the SFRA Level 1 and 2 [and hydrodynamic modelling.](#)”

Upon review, we agree to accept the addition of '[land reclamation and bridge design](#)' to the additional text proposed for paragraph 4.27, as set out in our initial response(s) to Appendix A. We also agree to replace '~~may~~' with '~~will~~' in the paragraph. Further to discussion with relevant officers, we do not however deem it necessary to add '[Impacts should be mitigated by design](#)' as this requirement would be addressed under our very detailed Design Policy PLP1. As previously discussed, and noted in our initial response, the Plan and its policies should be read holistically. In regards to the proposed addition to criterion O, we believe that the changed wording to paragraph 4.27 is sufficient in addressing the need for hydrodynamic modelling; the change from '~~may~~' to '~~will~~' also reinforces this.

PLP6: the City Centre

- Our main concern here relates to the Commercial Road Area. While I would not wish to prejudice the outcome of my discussions with colleagues about this next week, especially in the absence of a Statement of Heritage Significance or HIA, I can put forward my own thoughts on revised wording for consideration & discussion as follows:

Criterion 4 within the policy

“Proposals falling within the City Centre Commercial Area (as shown in figure 4.5) should include town centre uses at ground floor level. Proposals which retain and enhance active frontages in this area including outside / street seating will be supported. Outside of the commercial frontages schemes that deliver high-density mixed-use development will be permitted provided they improve connectivity between the retail area, and the surrounding areas ~~and~~ contribute to a modal shift to sustainable transport [and respond sympathetically to the character of the area.](#) Proposals within this area should provide space to accommodate and avoid negative impact on the markets which use Commercial Road. Interventions at the Arundel Street Focal Point should protect and enhance the fountain and take opportunities to utilise the space for cultural events.”

“4.111 ~~Within the~~ The City Centre Commercial Area [has a strong architectural character, through use of high quality building material, similar prevailing building heights and distinctive detailing.](#) ~~It includes four~~ ~~there are two~~ listed buildings ~~namely St Agatha's and All Saints Churches.~~ Proposals for redevelopment within this area must [respond sympathetically to this character and, where possible, retain the buildings that contribute to this character \(taking into account their special architectural and historic interest\)](#) ~~retain these buildings and respond to sympathetically to their settings.~~ The southern portion of the area borders the Guildhall &

Victoria Park Conservation Area and proposals on adjoining sites should respond sympathetically to the park and the Cathedral."

Thank-you for providing suggested text to include in criterion 4 of Policy PLP6 and paragraph 4.111, it is much appreciated. Prior to receiving your suggestions, Ben and I reviewed/redrafted the relevant wording, and have now agreed, and settled with the Policy Team Leader and our Head of Service, on the following wording below:

4. "Proposals falling within the City Centre Commercial Area (as shown in figure 4.5) should include town centre uses at ground floor level. Proposals which retain and enhance active frontages in this area including outside / street seating will be supported. Outside of the commercial frontages schemes that deliver high-density mixed-use development will be permitted provided they improve connectivity between the retail area, and the surrounding areas and contribute to a modal shift to sustainable transport. Proposals within this area should provide space to accommodate and avoid negative impact on the markets which use Commercial Road. Interventions at the Arundel Street Focal Point should protect and enhance the fountain and take opportunities to utilise the space for cultural events. Development proposals within the area should also avoid unacceptable harm to the significance of designated heritage assets within the area."

-
4.111 "Within the City Centre Commercial Area there are ~~two listed buildings namely St Agatha's and All Saints Churches~~ four Grade II listed buildings (105 Commercial Road, 116/118 Commercial Road, Trafalgar House and Connaught Drill Hall), and a range of other handsome buildings and features of interest. Proposals for redevelopment within this area must retain these buildings and respond to sympathetically to their settings. The southern portion of the area borders the Guildhall & Victoria Park Conservation Area and proposals on adjoining sites should respond sympathetically to the park and the Cathedral."
-

We hope that you find the above changes satisfactory in addressing the outstanding matters relating to soundness for Policies PLP1, PLP3 and PLP6. If there remain any areas of concern that cannot be resolved at this stage, we hope that this can be addressed in the SoCG.

In addition to the above, it is also worth bringing to your attention that the second half of criterion PLP3 2b (which we agreed on becoming a new criterion) has been amended slightly since our meeting on 08/11; 'prominence' has been replaced with 'presence.' Please see below:

"(new c) ~~Deliver a~~ The design, scale and massing ~~that of the scheme needs to~~ responds sensitively to the significance of Portchester Castle including its setting, taking into account its ~~prominence~~ presence in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance."

As I am sure you are aware, we have reached a point in the plan making process where it is not possible for the LPA itself to make any additional changes to the wording in the Plan. We hope to share a DRAFT version of the SoCG with you over the next week.

Please do let us know if you have any questions. We would be happy to set up a teams meeting if preferred.

Hope you have a nice weekend.

Kind regards,

Polly Murray
Senior Planning Officer (Policy)
Portsmouth City Council
Civic Offices, Guildhall Square
Portsmouth PO1 2AL

From: Robinson, Guy [REDACTED]
Sent: 08 November 2024 15:23
To: Cracknell, Ben [REDACTED] Murray, Polly
[REDACTED]
Subject: Portsmouth LP: informing a SoCG

Dear Ben and Polly

Good to speak with you this morning; thank you for your time. A constructive session. It may be helpful to begin with some positives which can help to inform the opening section of our forthcoming SoCG:

- We support its suite of heritage policies (including a minor change to PLP54) and commend the Council for its work to strengthen its heritage policy in the local plan.
- We support the Council's commitment to building retention, expressed through policies PLP2, PLP33 and PLP53.
- We welcome the LPA's proposed changes to the following policies: PLP10, PLP11, PLP13 and PLP14, addressing the soundness concerns we raised about those policies during the Regulation 19 consultation.

Of the outstanding matters following your response, my main residual concerns centre on PLP1, PLP3 and PLP6. Dealing with each in turn, and reserving the right to comment further (i.e. I am trying to explore solutions):

PLP1: Design

- There is a high level change that I think would go some way to reducing our concerns about criterion 7 of this policy. In essence this would be to elevate the power of what is already in paragraph 3.46 of the plan and connect with the point I raised at Reg 19 about design excellence. **Would the Council consider adding a new sub-criterion d) for criterion 7 along the following lines?**

"d) The highest standards of architectural quality are required."

- I need to confer with colleagues about the Tipner West opportunity area. The fact that the policy does support for tall buildings across the whole of Tipner West and a heritage/setting assessment has yet to be done does raise the risk of harm to the setting of Castle. We need to reflect on the degree to which we feel the plan manages that risk & the evidence base supports the expanded area. **I will report back on our further reflections next week.**

PLP3: Tipner West & Horsea Island East

- I welcome your agreement to acknowledge the need for hydrodynamic modelling. That said, we are not quite there in terms of resolving our concerns.
- We assert that such modelling will be required rather than “may”.
- Furthermore, in our response we referred also to land reclamation having the potential to impact on water flow and the potential for scouring. For completeness, bridge design also has the potential to impact on this issue. Taken as a whole, we put forward the following changes to supporting text for consideration:

“Regard should also be had to the potential impact of any new flood defences, land reclamation and bridge design on the nearby designated D-day slipways, through scouring caused by the funneling of water. Addressing this will ~~may~~ require further investigation through coastal hydrodynamic modelling to better understand potential water behaviour scenarios, and their impacts on coastal structures and options for erosion management. Impacts should be mitigated by design.”

- Beyond this detailed supporting text, we assert that a high level hook for hydrodynamic modelling in the policy itself is merited. I am not confident that we would agree to this matter only being referenced in supporting text. To exemplify one way this could be address in policy:

“o) Future development of the site will require land raising and construction of flood defences. Their implementation should be informed by the SFRA Level 1 and 2 and hydrodynamic modelling.”

PLP6: the City Centre

- Our main concern here relates to the Commercial Road Area. While I would not wish to prejudge the outcome of my discussions with colleagues about this next week, especially in the absence of a Statement of Heritage Significance or HIA, I can put forward my own thoughts on revised wording for consideration & discussion as follows:

Criterion 4 within the policy

“Proposals falling within the City Centre Commercial Area (as shown in figure 4.5) should include town centre uses at ground floor level. Proposals which retain and enhance active frontages in this area including outside / street seating will be supported. Outside of the commercial frontages schemes that deliver high-density mixed-use development will be permitted provided they improve connectivity between the retail area, and the surrounding areas ~~and~~ contribute to a modal shift to sustainable transport and respond sympathetically to the character of the area. Proposals within this area should provide space to accommodate and avoid negative impact on the markets which use Commercial Road. Interventions at the Arundel Street Focal Point should protect and enhance the fountain and take opportunities to utilise the space for cultural events.”

"4.111 ~~Within the~~ The City Centre Commercial Area has a strong architectural character, through use of high quality building material, similar prevailing building heights and distinctive detailing. It includes four ~~there are two~~ listed buildings ~~namely St Agatha's and All Saints Churches.~~ Proposals for redevelopment within this area must respond sympathetically to this character and, where possible, retain the buildings that contribute to this character (taking into account their special architectural and historic interest) ~~retain these buildings and respond to sympathetically to their settings.~~ The southern portion of the area borders the Guildhall & Victoria Park Conservation Area and proposals on adjoining sites should respond sympathetically to the park and the Cathedral."

I look forward to continuing our exchanges during the coming days as appropriate. Like you, I am keen to get to a place where we do not object to the Council's plan.

Best wishes

Guy

Guy Robinson, BSc, MRTPI

Historic Environment Planning Adviser

Development Advice – London and South East Region (Berkshire, Buckinghamshire, Hampshire, Isle of Wight & Oxfordshire), Historic England



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