



Tipner West – Draft Policy PLP3
SPA Recreational Disturbance
Mitigation Study

Portsmouth Local Plan Addendum 2025

For
Portsmouth City Council

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1.0 Introduction

Background

- 1.1 Draft policy PLP3 of the Portsmouth Local Plan Addendum 2025 sets out the proposed development allocation for Tipner West and identifies capacity for approximately 1,000 residential dwellings and 25,000 sqm of employment alongside infrastructure works, access and landscaping. The policy sits in the context of 11,369 new homes for delivery in the Plan Period 2025-2040, the target set out in the draft Portsmouth Local Plan Addendum 2025 for Portsmouth City.
- 1.2 This follows on from an earlier version of policy PLP3 for 814-1,250 new homes and 58,000sqm marine employment set out in the earlier Pre-Submission Local Plan 2024¹, which was the subject of a public consultation and was accompanied by a Habitat Regulations Assessment² (HRA). The 2024 version of PLP3 set out an expectation for a bridge linking Tipner West to Horsea Island East and Horsea Island Open Space. The bridge was to provide for sustainable transport modes only.
- 1.3 The bridge remains a critical infrastructure commitment of Portsmouth City Council (PCC) in the new Draft Local Plan Addendum 2025 and land is safeguarded for landfall of the bridge both in the Tipner West and Horsea Island Strategic Open Space (HISOS) site allocations. However, delivery of the bridge no longer forms part of the current Draft Policy PLP3.

Pre-submission Local Plan: HRA

- 1.4 The HRA of the Pre-Submission Local Plan considered the potential mitigation measures available to off-set likely recreational disturbance to the citation species and habitats of the following Habitats Sites:
 - Portsmouth Harbour SPA & Ramsar
 - Chichester and Langstone Harbours SPA & Ramsar
 - Solent & Southampton Water SPA & Ramsar; and,
 - Solent Maritime SAC

¹ [Pre-submission Portsmouth Local Plan](#)

² AECOM, 2024. Habitats Regulations Assessment of the Portsmouth Local Plan. Regulation 19. Project number: 60586784. For Portsmouth City Council

- 1.5 The HRA recognised that allocated housing will generate a demand for, and recreational burden on coastal sites that will increase throughout the period of the Local Plan and identified that with the exception of the Solent and Dorset Coast SPA, all of the Habitats Sites above are vulnerable to adverse impacts arising from recreational pressures. The Solent & Dorset Coast SPA was not considered sensitive to recreational disturbance on account of it being an open water site designated for foraging terns.
- 1.6 The HRA included specific consideration of Policy PLP3 and found that:
- the project was expected to take an approach based on the mitigation hierarchy to avoid adverse recreational pressures insofar as this was possible, with a focus on the management of recreational pressures.
 - that residents from Tipner West would benefit from access to Horsea Island Open Space (HISOS) with easy and convenient pedestrian and cycle access via a bridge connecting the two.
 - the project would make a significant contribution to the Solent Bird Aware scheme to enable an extension of ranger support; and,
 - other, unspecified mitigation measures would be implemented to address any residual effects that cannot otherwise be addressed by the high level strategic and masterplan-led approaches identified above.
- 1.7 The HRA was clear that the semi-natural recreational spaces of HISOS would be of value in contributing to the mitigation of recreational pressure on the Solent Habitats Sites deriving from Policy PLP3 stating:

The new residents of Tipner East and Tipner West will also both benefit from the semi-natural recreational opportunities to be provided by Horsea Island Open Space (Policy PLP9) which is being brought forward on the former Paulsgrove Landfill Site under extant Policy PCS3 (Horsea Island) of the Portsmouth Local Plan adopted in January 2012. This area of new Open Space is valuable in contributing to the mitigation of recreational pressure on the Solent Habitats sites because the SRMS stipulates that some developments may require additional mitigation due to their size or proximity to sensitive Habitats sites.
(Para 6.4, page 66 of the AECOM HRA)

However, with the bridge no longer part of the allocation within Draft Policy PLP3 to link to HISOS, and no certainty around the timing of delivery, the issue of how recreational pressures deriving from the residential elements of the allocation should be mitigated becomes relevant. This is because previously, the HRA relied on delivery of the bridge (and access to HISOS therefrom) for the mitigation of adverse impacts generated by recreational disturbance.

- 1.8 From this, and other aspects of the Local Plan Addendum, it follows that an update to the Local Plan HRA will be required to reconsider the recreation mitigation solutions for the new Draft Policy PLP3.

Scope of document

- 1.9 On this basis, PCC commissioned Holbury Consultancy Services Ltd to identify opportunities for additional and bespoke options for mitigation of recreational pressures arising from Draft Policy PLP3. The objective of this work is to build an evidence base from which the revised Local Plan HRA can draw. The report is structured around the following sections:
- **Section 2.0:** considers the role of Bird Aware Solent in mitigating recreational impacts and the extent to which it contributes to a bespoke mitigation strategy for Draft Policy PLP3.
 - **Section 3.0:** sets out an analysis of Tipner West to identify opportunities for the delivery of bespoke mitigation measures. It is centred on a review of existing green infrastructure, existing recreational facilities and consented development projects. The objective of this section is to identify opportunities for bespoke recreational disturbance mitigation measures that could be provided as part of the delivery of Draft Policy PLP3 to *'support a conclusion that full occupation of the proposed development would not have adverse impacts on the SPA through recreational disturbance'*³.
 - **Section 4.0:** presents the results of a literature review to establish the likely success of the opportunities identified in Section 2.0. It draws on available literature documenting bird response to recreational disturbance and reviews a series of coastal mitigation strategies from across the country to distil both commonalities and differences.
 - **Section 5.0:** explores the mitigatory role of a bridge linking HISOS to Tipner West now that delivery of the bridge no longer forms part of Draft Policy PLP3.
 - **Section 6.0:** uses the review of coastal strategies for the mitigation of recreational disturbance pressure across England to assess the role of SANG as part of the suite of mitigation opportunities available for development delivered in response to Draft Policy PLP3.
 - **Section 7.0:** concludes the study with a series of recommendations for PCC and a clarification of the role of this study relative to the HRA of the Local Plan Addendum.

³ Portsmouth City Council, June 2025. Tipner West - Draft Policy PLP3 Local Plan Addendum. SPA Recreational Disturbance Mitigation Study. Scope of Work.

2.0 The Role of Bird Aware Solent

2.1 Bird Aware Solent⁴ has been established to mitigate the in combination recreational impacts of roughly 147,500 new homes anticipated around the Solent up to 2040. The initiative focuses on an education programme to raise awareness of the vulnerability to disturbance of waterfowl using intertidal habitats and maintains a strong programme of monitoring to ensure efficacy and efficiency.

2.2 These activities are funded through various sources, including contributions from developers. Residential development under Draft Policy PLP3 will be required to contribute to Bird Aware Solent, in accordance with the relevant strategy at that time and in tandem with a package of bespoke and direct mitigation measures. Section 3.0 offers a series of opportunities that a developer may wish to explore and develop as part of such a suite.

2.3 The HRA of the Pre-Submission Local Plan 2024 included an assessment of PLP3 highlighting the importance of Bird Aware Solent in mitigating overall impacts. It states that:

'...the project is taking a mitigation hierarchy approach from concept masterplanning to avoid additional recreational pressures as much as possible by managing access to the European sites for new and existing residents and discouraging and preventing access where the resultant effects would be adverse. The contribution to the wider Solent Bird Aware scheme and extension of ranger support associated with PLP3 will be considerable, and further mitigation measures will be implemented to address any residual effects that cannot be addressed by these high level strategic and masterplan-led approaches.'

2.4 Whilst opportunities for bespoke, policy specific avoidance and mitigation measures will change in response to new Draft Policy PLP3, these measures aim to minimise site-specific impacts. They have limited effectiveness in reducing broader city-wide recreational pressures, although new facilities and coastal opportunities will also be utilised by current residents of the Tipner area, reducing existing recreational pressures on coastal areas to some degree. Housing coming forward through Draft Policy PLP3 will therefore be required to contribute to Bird Aware Solent and it is reasonable for the HRA to continue to rely on this provision in assessing the impact of Draft Policy PLP3 **in combination** with other housing allocations of the Local Plan.

2.5 The sections that follow focus on the opportunity to deliver bespoke, site specific mitigation that can be designed to mitigate the impacts of Draft Policy PLP3 when considered **alone**.

⁴ <https://birdaware.org/solent/about-us/our-strategy/>

3.0 Tipner West: site analysis

Introduction

- 3.1 Draft Policy PLP3 allocates Tipner West for approximately 1,000 residential units, increasing the population of the local area and generating an expectation of increased recreational pressures on adjacent coastal Habitats Sites. However, these Habitats Sites do not sit in isolation. Instead, they sit alongside a network of interconnected green infrastructure across the island, which offers open space to residents, and supports active lifestyles, community cohesion and connections with the natural world benefitting physical health, mental health & wellbeing and quality of life. The network forms part of the urban fabric and immediate context to Draft Policy PLP3 and provides opportunity for local dog walking and informal recreational opportunities on a day-to-day basis.
- 3.2 It is reasonable to assume that Draft Policy PLP3 will create opportunities to interface with existing green infrastructure and coastal spaces. From this it follows that existing green infrastructure has a potential role in absorbing some of the daily recreational pressures deriving from Draft Policy PLP3, particularly when considered in the context of PLP38: Green Infrastructure, which seeks to green both spaces and buildings across the City.
- 3.3 This section explores the potential of existing green infrastructure to absorb some of the daily recreational pressure that will derive from Draft Policy PLP3. Consideration is given to character, access to the coast scape and the potential for strong connections to Tipner West.
- 3.4 The objective of the analysis is to identify opportunities that will contribute to a bespoke approach to the reduction of recreational pressures on Habitats Sites relevant to Tipner West.

Approach

- 3.5 A simple QGIS desk exercise was employed to identify all green spaces within 3.5km of Tipner West (as the crow flies). This distance was selected as a reasonable distance to walk in 0.5-1.0 hours at a relaxed to moderate pace if walking in a straight line, without barrier or diversion. Each was researched, evaluated and catalogued to establish a description and ownership for the site (where possible). The Council's strategic lead on greening policies for the Local Plan was also consulted, to ensure that all sites have been captured and accurately logged.

- 3.6 Figure 1 sets out all the green spaces within 3.5km of Tipner, and within the boundary of the M275/A27 with a description of each appended at Appendix 1. This includes a basic account of each site insofar as it can be established from ownership where known and a desktop review to establish:
- those identified as Core Areas, Primary or Secondary Support Areas within the network of Solent Brent Goose and Wader sites⁵
 - those identified in the Local Green Spaces Background Paper & Green Infrastructure prepared by Portsmouth City Council^{6,7}
- 3.7 The analysis flags a swathe of interconnected Council owned sites on the northern, western and eastern edge of the island (Hilsea Lines, Anchorage Park) that have potential to offer a coherent network of green space accessible from Tipner West and with scope to offer a recreational resource.
- 3.8 However, these sites are only of value to Draft Policy PLP3 if pedestrian access from Tipner West is a realistic prospect.
- 3.9 Google Maps was used to plot walking routes from Tipner Lane to the edge of each site (see Appendix 2) and established that many of the identified sites are distant on foot, ruling them out as a realistic prospect for easy and regular pedestrian access from Tipner West. For instance, the closest point of Hilsea Lines is a 35-minute walk from Tipner West, with most of this green space further on again still to access. Realistically, this cannot offer a convenient and easy greenspace for residents of Tipner West who on a day-to-day basis, are likely to be looking for quick and accessible recreational opportunities. These may be for walking the dog, going for a walk/run from the house, or offering younger children the opportunity to play and/or older children/teens somewhere to meet and hang out. However, some parks such as Alexandra Park and Stamshaw Park are closer and represent a more realistic prospect.
- 3.10 Table 1 on the following page summarises the parks within closest proximity to Draft Policy PLP3.

⁵ <https://hiwwt.maps.arcgis.com/apps/instant/minimalist/index.html?appid=f4bbd6fe517647cba8bf0f3b8cfb7c1b>

⁶ <https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/Local-Green-Spaces-Background-Paper-PDF.pdf>

⁷ https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Green-Infrastructure-background-paper-Sep21_compressed.pdf

Table 1 Description of Council owned parks in proximity to Draft Policy PLP3 and approximate walking times

Site number (see Fig 1)	Site name	Proposed as Local Green Space ⁸	Time taken to walk from closest part of Tipner ⁹ Lane	Description taken from 'City of Portsmouth Parks, Gardens and Open Spaces' (Appendix 3)
7 & 8	Alexandra Park	✓	19 mins	Major green open space with extensive sporting facilities including regional Sports Centre, athletics track, all-weather pitch, tennis, netball, basketball, 5-a-side football, cricket, bowls and children's play area.
12-14, 27 & 28	Hilsea Lines	✓	35 mins (closest part) The substantial part of the lines is 48 mins walking time to Tipner Lane.	Council owned green open space that was once 19th century fortifications including a moat, defensive walls and embankments now overgrown with woodland and troubled by anti-social behaviour. Hilsea Lines extends to just over 80 hectares and stretches along the northern edge of Portsea Island connecting the Solent Way & English coastal paths.
15	Anchorage Park		60 mins	Linear park through housing estate linking the eastern coastal path with Hilsea Lines. Large open space with football pitch, children's play area and community centre.
4	Stamshaw Park		10 mins	Large park laid out during the 1970s on land reclaimed from the sea as part of the M275 motorway construction. Children's play equipment plus supervised adventure playground, kickabout area and skate park. Accessible from Tipner Lane under the motorway junction on the M275.

3.11 Alexandra and Stamshaw Parks stand out as the two closest parks to land allocated under Draft Policy PLP3 and the two most likely to offer opportunities for enhancements that could allow for the development of bespoke recreational mitigation. These sites have the immediacy to offer a realistic day to day function for Tipner West residents and have the potential to reduce recreational pressures accruing to the designated areas immediately adjacent to Draft Policy PLP3 through offer of a meaningful, accessible and convenient alternative.

⁸ Proposed as Local Green Space in Policy PLP46 of the emerging Local Plan

⁹ See Appendix 2. These times and distances use existing routes. Once Victory Quay has built out, many of the existing barriers to movement will fall and walking times are likely to decrease.

3.12 Site visits were undertaken on the 29th & 31st July 2025 to assess their scope for linkage to Draft Policy PLP3 and their potential to provide an everyday destination for future residents of Tipner West. Observations from the visit are as follows:

- **Stamshaw Park**

Access from Tipner Lane is possible from the roundabout known as the Tipner Interchange serving junction 1 of the M275. Pedestrian crossings allow access across the southern part of the interchange to a footpath along the embankment of the motorway, with a high enclosing fence (sound barrier) preventing access here. Instead, entrance to the park is possible from Harbour Way with a surfaced path providing access from the Tipner Interchange. The park comprises a large children's play area, skate park, hard football/tennis court area and an Adventure Playground and during the site visit, was busy with families and small children. Away from the play equipment, the park comprises amenity grassland, mature trees and some shrub planting.

Road noise from the M275 is intrusive and the park is dated and tired. It is overlooked by housing on the eastern side.

The surfaced footpaths throughout the park link to the Tipner Interchange in the north and the Rudmore Roundabout to the south. A circular walk is possible from land allocated under Draft Policy PLP3 via an underpass below the Tipner Interchange to return walking north along the edge of the harbour, which also provides access to the English Coast Path.

- **Alexandra Park**

As for Stamshaw Park, Alexandra Park is accessed under the M275 through the pedestrian crossings that allow safe passage across the Tipner Interchange. The route is convoluted and passes through a residential area to the south of allocated and consented but currently derelict and hoarded ground at Tipner East. The route follows the England Coast Path with blue signage used to direct users (although much had been tampered with such that it was pointing in the wrong direction).

Alexandra Park lies in two parts, north and south of the Mountbatten Centre that lies at its centre. To the north, the Park comprises relatively featureless amenity grassland providing a large green area for dogs to run free, open access and sports pitches. The park to the south is of more enclosed character with new tree planting along the surfaced footpaths that crisscross the area. Both parks are serviced with bins. The northern park is identified as a Primary Support Area for Brent Geese, identified through the Solent Wader and Brent Goose Network¹⁰. The southern park is identified as a Candidate Area.

¹⁰ <https://hiwwt.maps.arcgis.com/apps/instant/minimalist/index.html?appid=f4bbd6fe517647cba8bf0f3b8cfb7c1b>

3.13 The site visit highlighted two important contextual elements of direct relevance to Draft Policy PLP3: the England Coast Path and Victory Quay, summarised below.

- The **England Coast Path** is a National Trail that opened in 2020. When complete, the coast path will stretch for 5000km and will offer one of the longest continuous walks around the English coast. The path traverses the western side of Portsea Island (Figure 2) and links to the Solent Way through Hilsea Lines. At present, it bypasses the land allocated under Draft Policy PLP3 and pursues a route across the Tipner Interchange and through the residential area of Tipner to link with a new route constructed along the sea defences of Phase 3 of the North Portsea Coastal Scheme¹¹. The new defences allow pedestrian and cycle access along the coastal edge, which is elevated well above the level of the intertidal below. A series of photos is appended at Appendix 5 to show the character of the sea defences and use by local people. Further information, and more photographs specific to the Tipner Lake scheme, can be found on the Coastal Partners website [here](#).
- The northern part of the Tipner East site allocation, known now as Victory Quay, lies between Draft Policy PLP3 and the new sea defences of the North Portsea Coastal Scheme. At present the site is boarded and inaccessible. However, full consent has been granted for redevelopment of site to provide 835 residential units, commercial and community uses and vehicular access. The consent also includes for landscaping, construction of a sea wall and a new coastal path, cycle lane, car parking and servicing, and other associated works. Works have recently commenced to remediate the site in advance of construction beginning.

Once complete, Victory Quay will change the face of Tipner East and will extend the new sea wall, coastal path and cycle lane along the coast to the north and west, allowing access along the coast in a way that is currently not possible and linking to the underpass that exists under the M275 to connect Tipner East and Tipner West. The Design and Access Statement¹² articulates how this will be delivered, with the relevant extract included in Appendix 5. It shows a clear linkage through the site and identifies a future connection to Tipner West through the underpass. This represents an opportunity to connect the currently fractured pedestrian and cycle network that routes the England Coast Path through residential areas within Tipner itself. The underpass is currently inaccessible on foot (it links a construction site and a T J Waste & Recycling, neither of which are publicly accessible) but can easily be

¹¹ <https://coastalpartners.org.uk/project/north-portsea-island-tipner-lake>

¹² HGP Architects, August 2022. Design & Access Statement. Tipner East Regeneration. For Vivid Housing.

identified using satellite imagery (see Figure 3). This underpass is of strategic significance

Analysis

3.14 The review of the context in which the land allocated under Draft Policy PLP3 sits has flagged a number of points important for their potential to translate into opportunities for bespoke mitigation. They are as follows:

- Land allocated under Draft Policy PLP3 sits within easy walking distances of significant existing green infrastructure. Alexandra and Stamshaw Parks are both accessible from Tipner Lane and are sufficiently close to Tipner West for it to be reasonable to expect that new residents will access them on a daily basis.

Opportunities arising

- Improve links through improvements to signage, path surfacing and opening of new access points to enable more direct access.
- Upgrade parks to provide more attractive facilities and ensure that each are a destination in their own right, able to provide function for different recreational users. Currently, Stamshaw Park offers opportunity for children and young people, whilst Alexandra Park offers opportunities for a wider demographic. Upgrades should consolidate these functions and consider the scope to diversify appeal. Any work to Alexandra Park will need to reflect that the site sits as part of the Solent Waders & Brent Goose network.
- The England Coast Path is established as existing coastal infrastructure that caters for local users and users from afar alike. Without access to the coast around Tipner West, the current route through Tipner is less than ideal, requiring users to cross under the motorway using the Tipner Interchange and routing through residential areas to link up with the new sea wall constructed as part of the North Portsea Coastal Scheme.

Opportunities arising

- Draft Policy PLP3 will require the delivery of a new sea wall around the edge of Tipner West to hold the line and prevent flooding of the newly developed land. The sea wall will be constructed along the edge of land south of the existing firing range separating Portsmouth Harbour SPA from the residential allocation. This structure offers opportunity to link to the England Coast Path along the true coast in a way that reconciles human desire to access the coast, seascapes and views separate to the intertidal areas below.

- The new sea wall offers opportunity for careful design so that it can offer safe and easy passage to establish strong desire lines, focal points through the provision of interpretation and look out points so that it is a destination in its own right, and connections to ensure that it is immediately accessible to new residents of Tipner West. It offers opportunity to 'design out' and avoid impacts arising from recreational disturbance, consistent with the approach embodied in the mitigation hierarchy.
- The new sea wall will also offer opportunity to integrate with pedestrian/cycle routes delivered through the urban fabric of Draft Policy PLP3 to create circular routes for informal recreation. Opportunity further exists to link to pocket parks, public open space and other green infrastructure provision to deliver an integrated and interconnected place, through which residents can easily move, and access attractive coastal spaces for purposes of informal exercise and dog walking.
- The existing underpass below the M275 is a key piece of existing infrastructure and has the potential for upgrade and development to link the emerging Victory Quay and development coming forward in response to Draft Policy PLP3. It will need to be enhanced and secured to ensure that it is safe to use by all.

Opportunities arising

- Linkage of the two will resolve the currently fractured nature of the pedestrian/cycle access in this part of the Peninsula, delivering a coherent route for the England Coast Path and ensure a real and meaningful new coastal facility for residents of Tipner West, Alexandra Park and existing residents of the local area.

4.0 The mitigation of recreational pressures on the coast: supporting evidence

Introduction

4.1 Analysis of the context of Draft Policy PLP3 has identified three opportunities that have a potential role in mitigating recreational pressures on adjacent Habitats Sites. These can be summarised as the use of:

- existing green infrastructure to deliver improvements and opportunities for mitigation (Alexandra Park & Stamshaw park)
- the new sea wall as a tool to separate recreational access to the coast from sensitive habitats and species
- the existing underpass as a coherent link to the England Coast Path. The new sea wall offers the opportunity to establish a coastal route that satisfies desire for access to the sea and can be designed to be a destination in itself.

4.2 This section analyses available literature to assess whether, on the basis of the available evidence, it is reasonable to expect that these measures could be part of a bespoke mitigation package to address the recreational pressures arising from Draft Policy PLP3.

Tipner West: data available

4.3 Understanding current and likely future shoreline usage by both waterfowl and the general public (above the high-water mark) and intertidal areas is crucial for assessing the impact of disturbances related to Draft Policy PLP3. Significant impacts may occur if future residents and SPA birds seek to use the same habitats (intertidal zones and high-water roosts) at the same time and no suitable alternative habitat is available for SPA birds.

4.4 Surveys conducted to establish a baseline of wintering bird activity around Tipner West have recorded disturbance events, as well as the numbers and distribution of wintering birds. This data can indicate current disturbance levels in areas designated under Draft Policy PLP3 and can be compared with surveys of recreational disturbance at other estuaries. These findings may inform further surveys if necessary.

4.5 Current studies suggest that post-construction, the most common activities along the site's edge and intertidal areas will be walking and dog walking (Collop 2016¹³,

¹³ Collop, C.H. (2016) Impact of human disturbance on coastal birds: population consequences derived from behavioural responses. Unpublished Thesis. Bournemouth University.

Saunders and Panter, 2021¹⁴, Berridge, 2019¹⁵). While other potentially disturbing activities may occur, these two are likely to be the most frequent sources of disturbance.

- 4.6 Although there is no authorised public access, the foreshore around Tipner West and the land south of the firing range can be accessed by the public. There is evidence that this area is used by people for walking as well as other activities including camping, notwithstanding such access being unauthorised.
- 4.7 Surveys from other estuaries indicate that areas above the mean high-water mark are likely to be more where the focus of pressure lies on Tipner West foreshore. In contrast, the muddy intertidal areas are less likely to be used for recreation (Hughes, 1992¹⁶, Collop, 2016). Based on evidence from other studies it is considered that the sandy and gravelly areas on the southern edge of Portsmouth are more likely to draw users at low tide (Berridge, 2019, Sexton, 2017¹⁷).

Using existing research to understand likely recreational pressure

- 4.8 Various studies show that a significant portion of recreational pressure is concentrated on the upper shore, though this term is not always clearly defined (Collop 2016, Saunders and Panter 2021, Liley et al, 2011¹⁸). Some studies may include areas above or behind sea defences, while others refer to areas above the high-water mark that are not separated from intertidal zones (Berridge, 2019).
- 4.9 The findings of studies is mixed. For example, a 2020 survey across five sites in the Solent found that 86% of recorded recreational events took place on or above the shoreline, with very few occurring in intertidal areas (Saunders and Panter, 2021).
- 4.10 In contrast, a study in the Exe Estuary revealed that 55% of observed recreational events were shore-based, primarily involving walkers and dog-walkers. In this study, activities in intertidal areas were more common than at Solent sites, with 36% of observed events occurring there (Liley et al., 2011), including dog walkers, bait diggers, and walkers without dogs. Studies in Ireland found distinct differences in

¹⁴ Saunders, P and Panter, C. (2021) Solent Disturbance Study 2020/21. Unpublished report by Footprint Ecology.

¹⁵ Berridge, R. (2019) Identification of Wintering Wildfowl High Tide Roosts & Recreational Disturbance Impacts on the Taw Torridge Estuary Site of Special Scientific Interest (SSSI). Natural England Commissioned Reports, Number 281.

¹⁶ Hughes, M.R. (1992) Distribution of bird and marine life in the Exe estuary and the factors affecting the distribution. Report to English Nature; contract No. F 14/01/384.

¹⁷ Sexton, C (2017). Influence of the Disturbance on Shorebird Behaviour. CARL Research Project in collaboration with Leave No Trace Ireland. University College Cork. Ireland.

¹⁸ Liley, D., Cruickshanks, K., Waldon, J. & Fearnley, H. (2011). Exe Estuary Disturbance Study. Footprint Ecology.

patterns of access to inter-tidal areas depending on the accessibility of the shoreline (Sexton, 2017).

Using existing research to understand likely impact of recreational disturbance

- 4.11 Analysis of low tide WEBS data for several estuaries in England suggested that people walking along estuary footpaths/sea walls were having an adverse impact on the distribution of certain species. Over weekend periods, when use of footpaths is higher, the number of brent geese, common shelduck, dunlin and common redshank decreased in sectors with increased proximity to footpath access (Burton et al., 2002¹⁹).
- 4.12 Studies on the Exe Estuary found that 45% of shore-based events (activities that could disturb shorebirds) did not provoke any response from birds, while only 2% resulted in a major flight response. In contrast, 10% of potential disturbance events on intertidal habitats led to a major flight response from birds. This indicates that, although more disturbance events occurred on shore, activities in intertidal areas were more likely to elicit a behavioral response from shorebirds (Liley et al., 2011).
- 4.13 Modelling undertaken for the Solent has also identified the potential for disturbance of inter-tidal areas to adversely impact on wintering shorebirds (Stillman et al, 2012²⁰). In this study the largest increase in predicted survival (of overwintering waders) was achieved by moving intertidal activities to the shore. The result of this shift in activity was to confine disturbance events to the top of the shore, rather than extending across the entire inter-tidal area. This enabled a much greater proportion of the intertidal habitat to function undisturbed.
- 4.14 The output of the modelling for the Solent is supported by findings from studies on the Exe Estuary (Liley et al, 2011). In this research calculations were undertaken to qualify the comparative area of inter-tidal habitat lost to various activities. Disturbance caused by a walker on the shore path at low tide equated to the loss of 0.1ha of intertidal habitat for wading birds compared to 3ha for a dogwalker using intertidal habitat. The report authors considered the figure given for disturbance caused by a dogwalker on intertidal habitat was likely to be an underestimate.
- 4.15 Evidence from published research suggests that recreational activity above the mean highwater mark does not necessarily result in high levels of disturbance to shorebirds using adjacent intertidal areas. By way of example, research on two Suffolk estuaries

¹⁹ Burton, N. H. K., Armitage, M. J. S., Musgrove, A. J. & Rehfish, M. M. (2002) Impacts of man-made landscape features on numbers of estuarine waterbirds at low tide. *Environmental Management*, 30, 857-864.

²⁰ Stillman, R. A., West, A. D., Clarke, R. T. & Liley, D. (2012) Solent Disturbance and Mitigation Project Phase II: Predicting the impact of human disturbance on overwintering birds in the Solent. Report to the Solent Forum.

found that the presence of footpaths had no effect of the numbers of of wintering black-tailed godwit using adjacent intertidal areas once bivalve food supply had been taken into account (Gill et al., 2001²¹).

- 4.16 Studies on the Exe Estuary found that disturbance by people on land of waders using intertidal habitat was limited to an overlap period where waders were using intertidal habitat close to the shoreline, typically shortly before or after high water (Goss-Custard, et al, 2019²²).
- 4.17 Another study on the Exe estuary found shore birds were more likely to respond to disturbance by taking flight when the activity took place on inter-tidal habitats rather than the shore (Liley et al., 2011). Dog walkers with dogs off leads on the intertidal caused the highest percentage of major flights from all observed potential disturbance events.
- 4.18 A study of five sites in the Solent found that 83% of potential disturbance events did not result in any visible change to the birds' behaviour or any direct response. Only 17% of potential disturbance events generated a behavioural response, with 3% leading to a major flight (Saunders and Panter, 2021). In this study 86% of recorded activity took place on or above the shoreline.
- 4.19 Studies of two estuaries in Ireland concluded that the presence of a surfaced footpath and inaccessible shoreline (due to coastal defences) reduced human use of intertidal habitats compared to a site with an accessible beach front (Sexton, 2017). Disturbance rates of birds on the Douglas Estuary where access to the intertidal was more difficult were lower as activity was generally confined to areas of the upper shore.
- 4.20 An appropriate assessment of the impacts of the national cycle trail around the Exe estuary used flight distances to identify distances at which activities on the shoreline were considered to have no impact on birds present on the estuary (Goss-Custard 2007²³). No impact was identified at a distance of 200m for sections of shoreline where people were cycling/walking along a path and were not skylined. For sections on the skyline and for activities that are more irregular 400m was suggested.
- 4.21 A Natural England (2020) appropriate assessment of a stretch of the England Coastal Path between Hunstanton to Sutton Bridge used a similar approach. The

²¹ Gill, J. A., Norris, K. & Sutherland, W. J. (2001) The effects of disturbance on habitat use by black-tailed godwits *Limosa limosa*. *Journal of Applied Ecology*, 38, 846-856.

²² Goss-Custard, J.D., Hoppe, C.H, Hood, M.J and Stillman, R.A. (2019) Disturbance does not have a significant impact on waders in an estuary close to conurbations: importance of overlap between birds and people in time and space. *Ibis* 162, 845-862.

²³ Goss-Custard, J.D. (2007) National Cycle Network - Exe Estuary Proposals. Assessment of the Anticipated Effects on the Exe Estuary Special Protection Area. Devon County Council.

assessment concluded that any recreation activity on foot by people or dogs within <200m of roosting or feeding birds to be a potential cause of visual disturbance. The 200m distance is related to the distance at which the most sensitive species are likely to respond to an activity by taking flight.

- 4.22 The use of flight initiation distances (FID) to identify buffer zones or areas of impact is not straightforward as there is evidence to show that different species respond to disturbance in different ways and individuals within a species will also show different FID (Collop, 2016, Beale & Monaghan, 2004²⁴, Blumstein, 2003²⁵). However, the use of these broad bands, typically set by the FID of the most sensitive species, are a useful starting point for identifying the likely zone of influence of people using the shore and will be helpful in understanding the impacts of recreational pressures arising from Draft Policy PLP3 in due course.

Using existing research to understand likely impact of recreational disturbance on brent goose in intertidal areas

- 4.23 Brent geese using inter-tidal habitats are limited to feeding at mid and low water when *Zostera* and *Ulva* beds are exposed. Birds can forage in these areas up to c40cm depth of water at high water, and typically utilise these food sources early in the winter before moving to more terrestrial feeding as winter progresses.
- 4.24 Surveys of Portsmouth Harbour undertaken in 2023 by Arcadian Ecology and Consulting (HIWWT) show intertidal *Zostera* beds in the centre of the Harbour, and towards the northern and eastern shores²⁶. However, *Zostera* beds are not present around Tipner West.
- 4.25 Low tide count data from the BTO for 2014/15, 2020/21 and 2021/22 show the largest concentrations of brent geese occur along the northern shore of Portsmouth Harbour (notable Cams Bay and Paulsgrove Lake), Forton Lake on the western side of the harbour and Tipner Lake east of the M275. Wintering bird surveys undertaken by WSP show that brent geese regularly use the intertidal areas north and south of Tipner West over the winter, but use of the intertidal area immediately west of the site is more limited²⁷.
- 4.26 Surveys of recreational impacts on wintering brent geese undertaken at the Fleet (Dorset) and on the North Kent Marshes indicate that brent geese vary in their

²⁴ Beale, C.M. & Monaghan, P. (2004) Behavioural Responses to Human Disturbance: a Matter of Choice? *Animal Behaviour*. **68**, 1065-1069.

²⁵ Blumstein, D.T. (2003) Flight-initiation Distance in Birds Is Dependent on Intruder Starting Distance. *Journal of Wildlife Management*, **67**, 852-857

²⁶ Perry, C. 2024. Solent & Isle of Wight Intertidal Seagrass Survey 2023. NECR552. Natural England

²⁷ WSP, November 2022. Tipner West Regeneration. Wintering Bird Report 2021/22. For Portsmouth City Council

response to disturbance. On the North Kent Marshes over 50% of potential disturbance events caused no response at distances ranging from 20-190m, birds became alert at ranges of 20-110m, with birds responding to disturbance by walking or swimming at similar ranges (20-120m). Major flights occurred at ranges of 20-158m²⁸. Studies on the Fleet indicate that brent geese typically respond to disturbance when people are within 100m, although 67% of potential disturbance events did not result in a response²⁹. The figure of c100m for responses to visual disturbance by brent geese is very similar to the one provided in Cutts et al, 2013³⁰.

Implications of existing research for Draft Policy PLP3

- 4.27 Evidence from existing studies suggests that development pursuant to Draft Policy PLP3 will result in increased use of adjacent intertidal and upper shore habitats compared to the current baseline situation. In terms of intertidal habitats there is evidence to suggest much of the increased recreational activity would be focussed on the upper shore around Tipner West (on or above the mean high-water mark). Increased levels of recreational activity on intertidal areas is likely to cause disturbance to birds using this habitat.
- 4.28 However, there is evidence to demonstrate that the threshold for significant behavioural responses amongst many shorebirds may be higher for predictable activities (such as walking and dog walking) along the upper shore than similar activities undertaken on inter-tidal habitats. This is of significance for the opportunity that the Draft Policy PLP3 sea wall presents, to manage access to the coast in a way that is wholly predictable to waterfowl using the intertidal.
- 4.29 Research suggests that other projects subject to a HRA have been able to demonstrate no adverse effect on integrity for plans or projects that have increased access provision to the upper shore or areas immediately above the mean high-water mark.
- 4.30 Examples of similar assessments exist elsewhere, as follows:
- The Habitats Regulations Assessment of the Great Yarmouth Core Strategy considers the potential for adverse impacts arising from people walking along the top of the sea wall on the northern side of Breydon Water (Liley et al.,

²⁸ Liley, D. & Fearnley, H. (2011). Bird Disturbance Study, North Kent 2010/11. Footprint Ecology.

²⁹ Liley, D., Underhill-Day, J., & Gartshore, N. (2015). Bird Disturbance Survey of The Fleet, 2015. Unpublished report by Footprint Ecology for Natural England.

³⁰ N Cutts, K Hemingway & J Spencer (2013). Waterbird Disturbance Mitigation Toolkit Informing Estuarine Planning & Construction Projects. Version 3.2, March 2013. Institute of Estuarine & Coastal Studies (IECS). University of Hull.

2009). The assessment concluded that although walkers were not necessarily silhouetted against the skyline (because the A12 lies in an elevated position behind the sea wall), adverse effects were possible. Mitigation measures to address the risk of sky lining included a reroute of the existing path and improving the existing facilities for viewing the existing wader roost. These measures served to both educate and disseminate information about the sensitivity of the site, and interventions to direct pressures to reduce disturbance.

- Similarly, a Natural England (2020) appropriate assessment of a stretch of the England Coastal Path between Hunstanton to Sutton Bridge included measures to locate the path at the base of the current seawall on the landwards side to avoid disturbance effects. The purpose was to reduce access to the top of the sea defences where users would be sky lined. It also explored measures for providing viewing areas on the top of the sea wall at strategic points to assist with compliance.

4.31 Both these appropriate assessments flag the risk of sky lining as a potential disturbance issue and this is a point that design of the sea wall will need to consider. The sea defences forming part of the North Portsea Coastal Scheme are above the level of the intertidal and include a wall that screens much of the activity behind, offering a potential solution to the problem.

Implications for brent geese

4.32 It is likely that the high level of visual screening provided by the sea wall would mean brent geese show little response to recreational activities confined to the structure. Review of existing data and design of future survey work can ensure that data is collected to test this and establish likely efficacy of a new sea wall around Tipner West in preventing disturbance to any brent goose using the intertidal.

4.33 The new sea wall at Tipner East offers opportunity for future study to observe the response of feeding and roosting brent geese to recreational activity along the sea wall.

The role of viewpoints

4.34 Research in Jenkinson (2016) highlights that good views are important to 84% of dog walkers, and so to be most effective and acceptable, physical or visual barriers should not obstruct human views of the coast or other valued landscapes. The research introduces the concept of providing specific viewpoints to provide the sea views that walkers seek in managed form. From this it follows that viewpoints or viewing towers on the sea wall required by Draft Policy PLP3 could form part of the eventual design brief.

The role of screening

- 4.35 The Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy identifies measures to direct visitors away from sensitive areas with SPA/Ramsar site through the use of fencing, screening or waymarking. The use of fences as protective barriers to prevent human access has already been identified as successful in reducing the FID of shorebirds compared to highly disturbed areas without protective fencing (Ikuta & Blumstein, 2003).
- 4.36 Batey (2013) notes that there are no published results of manipulating coastal path designs to protect birds from human disturbance (at that time), although where people straying from paths is causing disturbance, re-surfacing or creating obvious edges to paths may be an effective measure of reducing disturbing activities.
- 4.37 Work by Jenkinson (2016) identified measures that could be used to influence the behaviour of dog walkers across the Solent. These included the use of infrastructure such as flood defences to guide or physically obstruct access to sensitive areas as a viable mitigation solution. The author notes that flood defences often comprise material such gabions, concrete blocks, rock armour or rip-rap that make access to the shore difficult. This piece of work is very relevant to the opportunities available to mitigate recreational pressures deriving from Draft Policy PLP3.
- 4.38 Other mitigation solutions include visual screening through the provision of bunds, landscape profiling or vegetation. Impenetrable fences can be doubly effective where they act as a visual as well as physical barrier. The report author recommends that such measures are the preferred primary intervention where it is necessary to keep people, with and without dogs, from walking across, or being visible from, areas that need protecting from disturbance.
- 4.39 The report notes that physical measures have the potential for very high levels of compliance and are effective, providing that the accessible land can deliver a sufficiently desirable experience.
- 4.40 These studies all flag the role of careful path design in the managing of disturbance and support the prospect of realigning the England Coast Path around the coastal edge of Tipner West, highlighting the need for careful design to ensure ease of use and screening to birds below.

Habituation

- 4.41 It is interesting to note that the mitigation solutions and concepts of how birds respond to shoreline disturbance detailed above bear strong similarities to the views expressed by coastal managers around the Solent (Stillman et al, 2009). At

workshops coastal managers expressed views that feeding waterfowl appeared to be more tolerant of walkers and dog walkers where access is provided via a sea wall or other defined structure and in particular where these front soft muddy sediment shores. This is the case for Tipner West where the majority of the bordering shore is composed of soft muddy sediments.

- 4.42 There was also a view that where dog walkers and walkers remain on defined coastal paths (including sea walls) there appears to be a degree of habituation by waterfowl feeding on intertidal habitats with little or no observed disturbance response (at both low and high water).
- 4.43 The report does note that the apparent habituation may be a result of birds maintaining a minimum distance from seawalls (avoidance) and thereby not using habitat that may be available for feeding in the absence of human activity.

Research into existing coastal strategies

- 4.44 A literature review of ten coastal mitigation strategies has been undertaken as part of this study (Appendix 6). The strategies have all been developed and tested through Examinations In Public and have been established to mitigate the impacts of increased recreational pressures on Habitats Sites generated by planned housing development in coastal and estuarine areas. All include monitoring, which is used to review the effectiveness of the mitigation measures employed.
 - 4.45 The central tenant of each strategy is that housing development generates diffuse recreational impacts that act in combination and require a strategic response to mitigate. The strategies have many common themes centred on wardening, outreach and education (particularly of dog walkers), monitoring of impacts and response to measures implemented, adaptive management and access restrictions inclusive of the management of access points and parking. Other measures are less consistently employed e.g. SANG.
- 5.1 Table 2 on the following page presents a summary of mitigation measures promoted by each.

Site	Mitigation Measures											
	Dog walking spaces	SANG	Access restrictions	Infrastructure upgrades	Dog education / engagement	Improving access	Code of conduct	Public education	Signage / interp boards	Monitoring	Site officer	Car park changes
Norfolk (North Norfolk, GIRAMS and RAMS)	o			o	o	o		o	o	o	o	o
Humber				o	o	o	o	o	o	o	o	
South-East Devon (Exe Estuary, Dawlish Warren & Pebblebed Heaths)	o	o	o	o	o	o	o	o	o	o	o	o
Bird Aware Solent	o	o	o	o	o		o	o	o	o	o	o
Poole Harbour			o		o			o	o	o	o	
Thanet Coast and Sandwich Bay					o			o	o	o	o	
Bird Wise North Kent coast	o			o	o	o	o	o	o	o	o	o
Severn Estuary	o	o		o				o	o	o	o	o
Essex Coast			o	o	o			o	o	o	o	o
Sunderland Coast												

Table 2 Summary of mitigation measures employed by coastal mitigation strategies

- 4.46 These strategies have been developed to address in combination effects arising from Plan led housing delivery. Caution must therefore be employed in extrapolating their approach and relevance to Draft Policy PLP3. However, many of the measures employed make good and reasonable sense at the level of an individual policy, and it is fair to consider their inclusion in coastal mitigation strategies as offering strong support to the opportunities identified as possible mitigation for Draft Policy PLP3.
- 4.47 Upgrading existing infrastructure as a mitigation measure is not applicable to all strategies, but it is a key feature in most. The HRA of the Essex Coast Recreational Disturbance Avoidance Mitigation Strategy (RAMS) supports the enhancement and promotion of local parks and paths as an important mitigation measure. It concludes that this approach is preferable to providing SANG. The rationale behind this is that it is more practical to improve existing green infrastructure and create high-quality dog walking areas linked to new developments, than to create SANG effective in diverting people from the strong draw of coastal areas.
- 4.48 The Sunderland Coast Mitigation Strategy recognises the use of SANG but makes the point that land availability is a material constraint in delivery. Instead, it promotes a focus on enhancement of existing green space, with a view to improving linkage between spaces and making them more attractive to visit, so drawing visitors away from the coast. Infrastructure upgrades identified include fencing, path improvements and habitat modification / creation within existing green space³¹.
- 4.49 Finally, the most local example to consider is the approach taken with the now consented Victory Quay, which does not include SANG. Instead, the site focuses on the delivery of pedestrian and cycle links and relies on existing green infrastructure in close proximity to absorb recreational pressures stemming from the new development and payments to Bird Aware Solent.

Conclusion

- 4.50 The Draft Portsmouth Local Plan Addendum 2025 will be supported by an updated HRA addressing land allocated at Tipner West as set out in Draft Policy PLP3. Section 2.0 of this report has identified a number of opportunities to avoid and mitigate recreational pressures arising from the allocation and Section 3.0 has identified a raft of research providing evidence to support the likely effectiveness of these measures. A review of other coastal mitigation strategies around the English Coast also lends confidence to the proposals, highlighting that mitigation

³¹ https://icm.sunderland.gov.uk/media/30626/HRA-Mitigation-Strategy/pdf/AD.09_HRA_Mitigation_Strategy.pdf?m=1695127690073&ccp=true#cookie-consent-prompt

packages have been found that enable plans and projects to go ahead where potential recreational impacts have been identified.

- 4.51 To conclude, a body of evidence exists that is supportive of the options identified as potential measures for mitigation of recreational disturbance associated with the residential development forming part of Draft Policy PLP3.
- 4.52 The detailed design of a comprehensive package of mitigation measures would be part of a planning application and subject to detailed scrutiny as part of a project specific HRA. It is concluded that development of such a package (based on current evidence) is a reasonable expectation at the project stage.

5.0 The role of Horsea Island Strategic Open Space

Introduction

- 5.1 An earlier version of Policy PLP3 was the subject of public consultation in summer 2024. The Pre-Submission Local Plan of which it formed part was accompanied by an HRA³², which considered the potential measures available to mitigate likely recreational disturbance. The earlier Draft Policy PLP3 set out an expectation Tipner West would link to Horsea Island Strategic Open Space (HISOS) and the HRA found that residents from Tipner West would benefit from this access with easy and convenient pedestrian and cycle access via a bridge connecting Tipner West to HISOS. Access to HISOS was assessed as an important strand in the mitigation of recreational impacts of the housing allocated as part of the earlier Draft Policy PLP3.
- 5.2 The bridge remains a critical infrastructure commitment of the City Council and land is safeguarded for the landfall of the bridge both in the Tipner West and HISOS site allocations. However, the bridge will no longer be delivered as part of Draft Policy PLP3 and is no longer an allocation in the Local Plan.

Analysis

- 5.3 Whilst an appropriate assessment of a plan or project does not need to reach a conclusion with absolute certainty, it must be satisfied that there is no reasonable doubt as to the absence of adverse effects on the integrity of a Habitats Site³³.
- 5.4 Although the delivery of the bridge remains an expectation of the Local Plan and policy is in place to safeguard the landfalls, it no longer forms part of Draft Policy PLP3. This disaggregation means that control and funding of bridge delivery is ceded to other interests, and there can be no certainty that the bridge will be delivered in parallel with redevelopment of Tipner West.
- 5.5 With the bridge no longer part of the allocation (other than safeguarding of landfalls), and given uncertainties over timing of bridge delivery, there is insufficient certainty that easy pedestrian and public transport access to HISOS across the bridge can be relied upon as part of the specific mitigation package for the circa 1,000 dwellings at Draft Policy PLP3.

³² AECOM, 2024. Habitats Regulations Assessment of the Portsmouth Local Plan. Regulation 19. Project number: 60586784. For Portsmouth City Council

³³ Landelijke Vereniging tot Behoud van de Waddenzee and Another v Staatssecretaris Van Landbouw, Natuurbeheer en Visserij (Case C-127/02) [2005] 2 C.M.L.R. 31

- 5.6 For this reason, the HRA cannot rely on it to provide access for pedestrians and cyclists generated by development coming forward under Draft Policy PLP3.
- 5.7 HISOS is expected to come forward under Policy PLP9 providing important open space and recreational opportunities for the people of Portsmouth City. Port Solent will include opportunities for parking, ensuring that an expectation of access to HISOS by car is reasonable and as part of a larger focus of activities, it is reasonable to assume that the site will have a role to play in the delivery of a recreational opportunity effective at mitigating some of the recreational pressures that housing allocations will generate when acting in combination with one another. It will remain contextually relevant with other on-site and nearby green spaces, and existing sea-front walkways, and will have a role in delivering a network of facilities to provide a strategic response to diffuse, Plan wide recreational pressure.

6.0 Draft Policy PLP3: bespoke mitigation measures - the role of SANG

Introduction

- 6.1 As part of the brief for this study, Portsmouth City Council requested that consideration be given to the role of SANG as part of the suite of bespoke measures that could be brought forward to mitigate increased recreational pressures. This section addresses this question from two perspectives:
- the extent to which physical opportunity exists for the delivery of SANG alongside Draft Policy PLP3; and,
 - whether SANG is a necessary part of a suite of mitigation measures to reduce recreational pressures deriving from Draft Policy PLP3.
- 6.2 As relevant context, this section provides a brief review of the history and function of SANG before considering each of these questions in turn.

Origin of SANG

- 6.3 SANG was initially developed as a mitigation strategy for Thames Basin Heaths SPA, a heathland Habitats Site extending across Surrey, Hampshire and Berkshire and administered by 11 separate local planning authorities. It came forward within a very specific context, drawing on a sound evidence base establishing that the Thames Basin Heaths SPA was negatively affected by impacts associated with existing recreational disturbance and that existing and proposed development pressure was/would be intense. Other approaches to mitigation were tested (at Inquiry and the High Court) but were discounted on account of the specific circumstances of the Thames Basin Heaths SPA, which is highly fragmented and dispersed, preventing alternative approaches from being effective³⁴.
- 6.4 The success of SANG in mitigating recreational impacts on the Thames Basin Heaths SPA has been established through a monitoring programme (Strategic Access Management and Monitoring (SAMM)) funded by developer contributions that runs alongside the provision of SANG. The role of SAMM as a sense check is an essential element of the overall delivery framework because it addresses any residual uncertainty and provides a sound basis for adaptive management if required. The precautionary principle embedded within the Habitats Regulations assessment framework means that SANG without associated SAMM would not be considered sufficiently robust to enable compliance⁹.

^{34 & 9} Chapman, C, July 2014. The Suitable Alternative Natural Greenspace (SANG) Approach: Are we missing more suitable alternatives? The Habitats Regulations Assessment Journal. Issue 2. DTA Publications.

- 6.5 The success of SANG & SAMM at enabling development within close proximity to the Thames Basin Heaths SPA can generate an expectation that SANG is appropriate mitigation for other Habitats Sites also vulnerable to impacts from increased recreational pressures. However, it does not necessarily follow. Without a sound evidence base to support, and a funded monitoring package alongside, it is not reasonable to assume that SANG is necessarily an appropriate means of mitigating recreational impacts on a Habitats Site. This is supported by the findings of the literature review, described below

The relevance of SANG to the mitigation of coastal recreation pressures

- 6.6 A literature review of ten coastal mitigation strategies has been undertaken as part of this study (Appendix 6). The strategies have all been established to mitigate the impacts of increased recreational pressures on Habitats Sites generated by planned housing development in coastal and estuarine areas. Some, but not all, employ SANG as an effective means of mitigating recreational pressures that would otherwise accrue to the coast. Mitigation strategies for the Severn Estuary, Solent, South East Devon and the Exe recognise a role for SANG and include it within the list of measures appropriate for mitigation of recreational pressures. Others are explicit in stating that SANG is not appropriate and do not seek to bring it forward as part of a suite of measures (see Table 1, page 18). The strategies for the Essex coast and for Thanet Coast and Sandwich Bay are notable in this regard.
- 6.7 The SAMM Evidence Report published by Dover District Council³⁵ highlights that the coast offers unique features which cannot be replicated by an inland green space presented by SANG. From this it follows that the provision of SANG for a coastal housing site is not an appropriate mitigation measure.
- 6.8 The revised mitigation strategy promoted by Bird Aware Solent states that the Solent Recreation Mitigation Partnership (SRMP) will continue to promote SANGs where people can enjoy recreation away from the coast. The support of Bird Aware Solent is for SANG 'away from the coast' and is consistent with the Dover approach.
- 6.9 The SANG included as part of the consented Welborne scheme³⁶ is a good example of non-coastal SANG, where housing coming forward at some distance to the coast has easy access to semi-natural habitats delivered through the provision of SANG. The Welborne SANG provides a genuine alternative for new and existing residents seeking space for the daily dog walk and/or exercise for which a trip to the coast would be less convenient. It can reduce existing pressure (through providing a new

³⁵ Dover District Council. September 2022. Thanet Coast and Sandwich Bay SPA. Strategic Access Mitigation and Monitoring Strategy (SAMM) Evidence Report.

³⁶ <https://www.welborne.co.uk/>

local facility for existing residents) as well as reducing the potential for new pressures from new residents.

6.10 In contrast to the example of Welborne, Draft Policy PLP3 allocates housing on the coast and immediately adjacent to Portsmouth Harbour SPA & Ramsar. There are a number of reasons why SANG is unlikely to offer an appropriate and effective basis for mitigation, as follows:

- To be effective, SANG must be equal to or more attractive than the SPA for which it is providing mitigation. The Portsmouth Harbour SPA and Ramsar site sit immediately adjacent to Draft Policy PLP3. For SANG to be effective, it must overcome the immediate draw and convenience of the designated site. No greenspace exists locally that could fulfil this role.
- Reducing housing numbers to deliver SANG as part of the allocation risks creating a destination that draws from a much wider catchment than just the new housing alone. The draw of the coast is such that SANG alongside risks the creation of a honey pot, and to manage against this, goes against the principle of establishing SANG in the first place. In this sense, coastal SANG is not consistent with the protection of the coastal location in which it is located. Consistent with this, the consent of Victory Quay is a local example of where housing will be delivered in a coastal location without need for a SANG.
- In any event, the design of the sea wall will help manage recreational pressures and avoid impact, providing an opportunity for coastal access that negates the need for SANG. The sea wall itself will naturally attract visitors. The key focus should be on ensuring that any development under Draft Policy PLP3 includes green links and pocket parks that are an integral part of the new, built environment. This will facilitate easy and convenient access to the coastal edge of the site, allowing residents to enjoy the sea wall without challenge or difficulty. This type of strategy sits behind the consented and adjacent Victory Quay, from which it follows that it must have merit.
- Beyond the sea wall, there are other alternatives. Enhancement of existing local spaces (local parks) that are quickly accessible and have the potential to become more so, together with the realignment of the England Coast Path offers the potential for mitigation that is real, meaningful and contextually appropriate.

6.11 In conclusion, it is reasonable to consider SANG is part of a toolbox of possible mitigation measures that can be used to address recreational measures in coastal contexts. This is clear from the review of coastal mitigation strategies but focuses on the delivery of inland SANG away from the Coast. However, without evidence in support of SANG in an immediate coastal setting, and no practical opportunity to deliver, it is difficult to see how it could have a role in the mitigation of Draft Policy PLP3. Instead, analysis of the context for Draft Policy PLP3 has established the

existence of strong alternatives that are likely to be more effective, negating the need for SANG as a tool. These alternatives are a better fit than SANG in the mitigation of recreational pressures deriving from Draft Policy PLP3

- 6.12 Portsmouth City Council has consulted Natural England and other key stakeholders on the need for SANG through a consultation forum known as the Tipner West Regulatory Panel. Minutes of the Regulatory Panel at which the findings of this report were discussed are attached at Appendix 7.
- 6.13 Natural England concurs that SANG is unlikely to form part of the package brought forward to mitigate recreational impacts of Draft Policy PLP3.

7.0 Conclusion

- 7.1 In the absence of a specific wording within Draft Policy PLP3 requiring the provision of pedestrian and cycle access to HISOS through a linking bridge, this report has considered the scope to deliver alternative measures to mitigate recreational impacts on the adjacent Portsmouth Harbour SPA and Ramsar site. The purpose of this work is to provide an evidence base on which the HRA of the draft Portsmouth Local Plan Addendum 2025 can draw in addressing the changes.
- 7.2 Analysis of the area in and around the land allocated under Draft Policy PLP3 has identified three opportunities to avoid and mitigate recreational pressures arising from the development of land allocated under PLP3. These are:
- careful design of the sea wall around Tipner West to provide access to the coast that is both managed and separated in space to sensitive intertidal habitats
 - use of the existing underpass below the M275 to establish a ped/cycle link between Tipner West and Victory Quay. The link will enable realignment of the England Coast Path, addressing the currently fractured provision to bring it along the coastal edge of Tipner West and providing a meaningful link to the recent improvements of the North Portsea coastal scheme. This offers opportunity to boost the coherence, scenery and amenity value of the path.
 - improvements to Alexandra Park and Stamshaw Park to update the facilities that they offer and improve the quality of the greenspace so that they become a natural part of daily use of outdoor space by residents of Tipner West and surrounding area.
- 7.3 These measures represent a series of opportunities not previously considered in relation to Tipner West. Evidence suggests that they could play a significant role in reducing the recreational pressures associated with Draft Policy PLP3.
- 7.4 These measures could come forward as part of a suite of bespoke mitigation measures that would sit alongside an appropriate contribution to Bird Aware Solent to address in combination measures, and in the context of HISOS, likely to become available at some point in the project-level delivery of Draft Policy PLP3.
- 7.5 The HRA will need to use the evidence provided to evaluate the effectiveness of these measures in mitigating the recreational impacts stemming from Draft Policy PLP3 and must also evaluate their efficacy in the context of contributions to Bird Aware Solent.
- 7.6 Portsmouth City Council may wish to review Draft Policy PLP3 to strengthen reference to these opportunities. This will ensure that they are fully explored and utilised in future project design.



Key

- Draft Policy
PLP3
- Green Space

0 0.5 1 km

Project: Tipner West -
SPA Recreational
Disturbance Mitigation
Study

Figure 1: Green Spaces
within 3.5km of land
allocated under Draft
Policy PLP3

Client: Portsmouth City
Council

Date: 16/09/25

Google Satellite
Imagery ©2025 Airbus,
Landsat / Copernicus, Maxar
Technologies, Map data
©2025





Key

- English Coast Path
- Solent Way
- Draft Policy PLP3

0 0.5 1 km

Project: Tipner West -
SPA Recreational
Disturbance Mitigation
Study

Figure 2: Existing routes:
English Coastal Path and
Solent Way

Client: Portsmouth City
Council

Date: 16/09/25

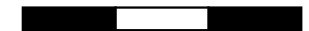
Google Satellite
Imagery ©2025 Airbus, Landsat
/ Copernicus, Maxar
Technologies, Map data ©2025



Key

- Draft Policy PLP3
- Victory Quay:
consented scheme to
redevelop derelict land
- Alexandra Park
- Stamshaw Park
- English Coast Path
- ↔ Existing underpass

0 100 200 300 m



Project: Tipner West - SPA
Recreational Disturbance
Mitigation Study

Figure 3: Existing context to
Draft Policy PLP3

Client: Portsmouth City Council

Date: 16/09/25

Google Satellite
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Appendix 1
Green spaces in proximity to Tipner West

Legend

Identified as Local Green Space within Local Green Space paper
Not identified as Local Green Space within Local Green Space paper

Solent Wader Brent Goose Network: <https://hiwwt.maps.arcgis.com/apps/insant/index.html?appid=f4bbd6fe517647cba8bf0f3b8cfb7c1b>

Portsmouth City Council Local Green Spaces Background Paper 2024: <https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/Local-Green-Spaces-Background-Paper-PDF.pdf>

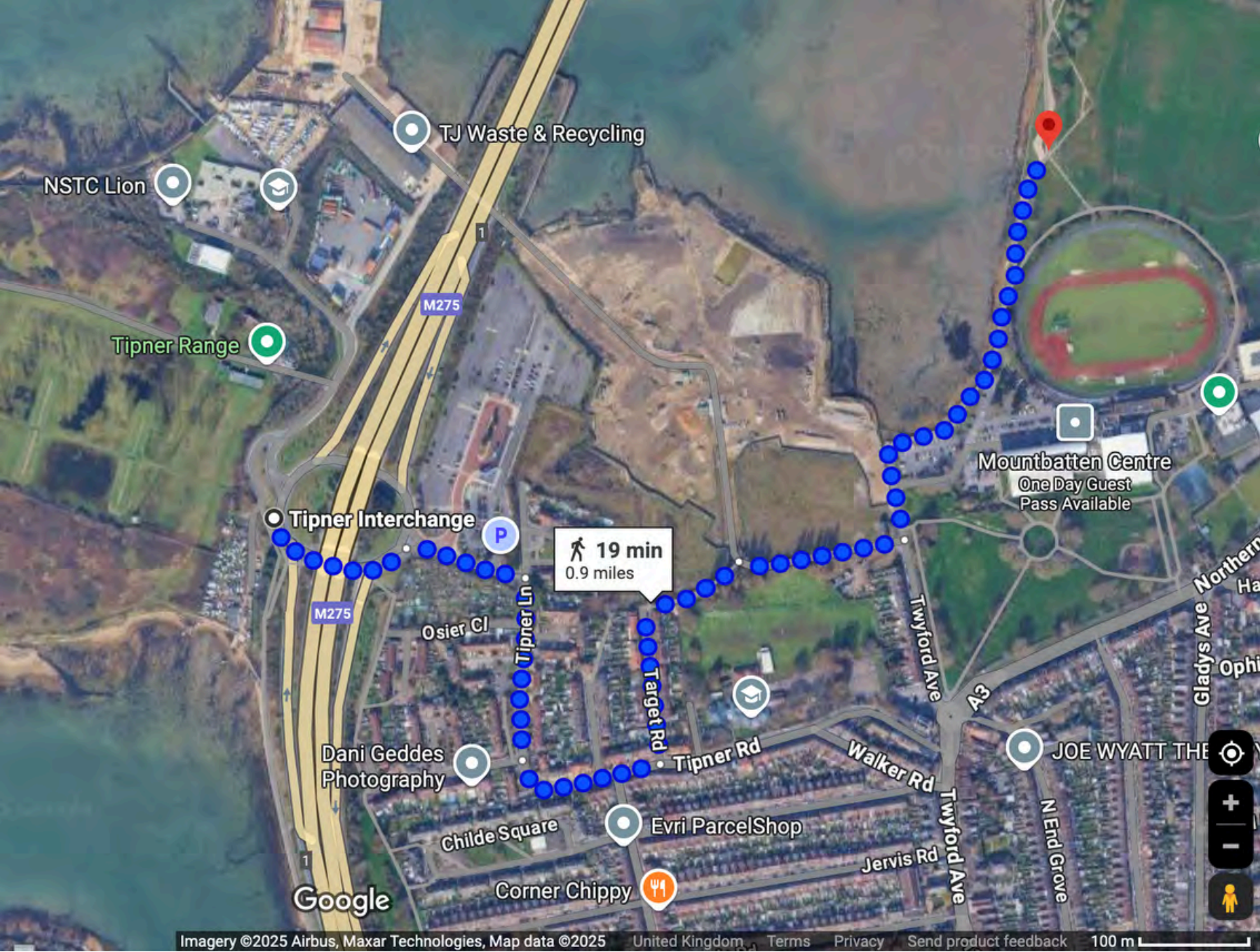
Number	Name	Type	Ownership	Description	Solent Wader Brent Goose Network	Identified in Local Green Space paper	Existing designations (from LGS paper)
1	N/A	Sports pitches	UTC (likely)	Several sports pitches adjacent to UTC			
2	N/A	Grassland	UTC (likely)	Linear patch of grass with some trees in front of UTC			
3	Portsmouth Grammar School Playing Fields	Sports pitches	Portsmouth Grammar School	Several sports pitches adjacent to Hilsea Lines	P43 - Primary Support Area		
4	Stamshaw Park	Parkland	PCC	Well-maintained park with adventure playground, basketball courts and skate park adjacent to M275 and England Coast Path. Popular within local community		Yes	PCS13 - protected open space
5	Childe Square	Grassland	PCC (likely)	Small patch of grassland in middle of housing			
6	Childe Square	Grassland	PCC (likely)	Small patch of grassland in middle of housing			
7	Alexandra Park	Parkland	PCC	Large park of historical significance adjacent to England Coast Path and above the Mountbatten Centre. Contains sports pitches and is popular amongst residents, particularly for dog walks. Hosts local youth football matches	P40 and P40A - Primary Support Area. Northern portion outside PSA	Yes	PCS13 - protected open space
8	Alexandra Park	Parkland	PCC	Formal landscaped park with playground, seating and trees	P39 - Candidate site - Low Use Area	Yes	PCS13 - protected open space
9	Stamshaw Junior School Grounds	Grassland	Stamshaw Junior School	Playing fields for the school with trees	P38 - Candidate site - Low Use Area		
10	N/A	Grassland	Unknown	Fenced off section of unmanaged grassland			
11	Hilsea Lines	Woodland and grassland	PCC	Linear green and blue space / corridor centred around 18-19th century fortifications. Designated scheduled ancient monument. Popular for walks and opportunities for fishing. Contains Foxes Forest.		Yes	PCS13 - protected open space PCS23 - design and conservation
12	Hilsea Lines	Woodland and grassland	PCC	Linear green and blue space / corridor centred around 18-19th century fortifications. Designated scheduled ancient monument. Popular for walks and opportunities for fishing. Contains Foxes Forest.		Yes	PCS13 - protected open space PCS23 - design and conservation
13	Hilsea Lines	Woodland and grassland	PCC	Linear green and blue space / corridor centred around 18-19th century fortifications. Designated scheduled ancient monument. Popular for walks and opportunities for fishing. Contains Foxes Forest.	Includes P101 - Candidate site - Low Use Area	Yes	PCS13 - protected open space PCS23 - design and conservation
14	Anchorage Park	Sports pitches and parkland	PCC	Park with sports pitches and playground linking to Hilsea Lines and the Solent Way		Yes	PCS13 - protected open space
15	N/A	Woodland and grassland	PCC (likely)	Green border around Anchorage park, Anchorage community centre and Morrisons			
16	Langstone Harbour Sports Ground	Sports pitches	PCC	Sports pitches adjacent to A23030 and the Solent Way	P11 - Core Area		
17	Admiral Lord Nelson Playing Fields	Sports pitches and woodland	Admiral Lord Nelson School	Several sports pitches with a wooded band to the east	P53 - Candidate site - Low Use Area		
18	Great Salterns Recreation Ground	Scrubland, sports pitches and parkland	PCC	Large open space with grassland, overgrown scrubland and trees. Contains cricket pitches which host Hilsea Cricket Club, football pitches, has trails / walking routes and hosts a park run.		Yes	PCS13 - protected open space In close proximity to SPA, SAC, SSSI and RAMSAR sites.
19	Cobden Park	Parkland	Unknown	Park with playground, basketball court and trees			
20	Portsmouth College Grounds	Sports pitches and grassland	Portsmouth College (likely)	Grassland associated with Portsmouth College			
21	Tangier Park	Sports pitches and parkland	PCC	Park with playground, sports pitches and sword sands bowling green adjacent to Baffins Pond. Area with over 800 trees planted in the north known as the 'Baffins Pond Association Woodland'. Site of dog walks	P20/P52/P54 - Core Area	Yes	PCS13 - protected open space
22	Baffins Pond	Parkland and pond	PCC	Pond with surrounding grassland and trees adjacent to Tangier Park. Provides fishing and dog walking opportunities and is managed as a refuge for wildlife	P129 - Candidate Site - Low Use Area	Yes	PCS13 - protected open space
23	N/A	Grassland	Unknown	Rectangle of grassland in the middle of houses			
24	Hilsea Lines	Scrubland and grassland	PCC	Scrub corridor and grassland between Portsmouth Grammar School playing grounds and Hilsea Lines moat. Part of Hilsea Bastion gardens with pump track		Yes	PCS13 - protected open space PCS23 - design and conservation HS5: Hilsea Lido
25	Hilsea Lines	Grassland	PCC	Grassland surrounding lido, splash pool and playground		Yes	PCS13 - protected open space PCS23 - design and conservation HS5: Hilsea Lido

26	N/A	Grassland	PCC (likely)	Green strip alongside English Coastal Path that runs from Hilsea lines to Alexandra Park		
27	Alexandra Park	Grassland	PCC	Small square of grassland encompassed within the extent of the southern portion of Alexandra Park	Yes	
28	N/A	Grassland	Unknown	Small triangle of grassland above Stamshaw Park		
29	N/A	Grassland and woodland	Unknown	Green corridor alongside Solent Way		
30	Rugby Camp	Sports pitches	Unknown	Sports pitches, mainly rugby, with a large car park and clubhouse. Home ground of Portsmouth Rugby Football Club. There is a cricket pitch in the east of the site	Yes	PCS13 - protected open space
31	Portsmouth FC Training Ground	Sports pitches	Portsmouth FC	Sports pitches behind large car park		
32	N/A	Grassland	Unknown	Square of grassland located next to large car park with some bordering trees		
33	Gatcombe Gardens	Parkland and trees	PCC	Park with wooded areas of mature trees forming the grounds of Grade II listed Gatcombe House	Yes	PCS13 - protected open space
34	John Wesley Gardens	Parkland	PCC	Park with the John Wesley memorial, informal football pitch and a playground	Yes	PCS13 - protected open space
35	N/A	Grassland and trees	Unknown	Green space to the south of John Wesley gardens bordering road		
36	Great Salterns Golf Course	Golf course	PCC	Golf course segmented by Burfield Road and a hotel. Southern portion includes Great Salterns lake	P12 - Core Area. P19D - Primary Support Area. P19B - Secondary Support Area. P19A, P19E - Candidate sites - Low use	
37	N/A	Scrubland	Unknown	Rectangle of disused land dominated by scrubland		
38	Unknown	Parkland	Unknown	Small park with playground amongst houses		
39	N/A	Grassland	Unknown	Rectangle of grassland amongst houses		
40	Mayfield School	Sports pitches and grassland	Mayfield School	Sports pitches and grass area associated with school		
41	College Park	Sports pitches, parkland and grassland	PCC	Popular well-landscaped park with a selection of features, including playground, animal enclosure, sports pitches, basketball court and kiosk.	Yes	PCS13 - protected open space
42	Kingston Cemetary	Cemetary	PCC	Large cemetery of historical and architectural interest, including chapels, memorials and the Lych Gate at southern entrance, some of which are Grade II listed buildings. Popular for walks with expanse of grassland and trees	Yes	PCS13 - protected open space. Southern part of the site is a Grade II listed park and garden
43	Kingston Park	Parkland	PCC	Park with playgrounds and mature trees, Contains jump track, informal football pitches, outdoor gym and table tennis	Yes	PCS13 - protected open space
44	Tamworth Park	Sports pitches and parkland	PCC	Popular park, particularly for dog walks, with sports pitches and playground. Eastern end of park hosts trees, shrubs and pond	Yes	PCS13 - protected open space
45	Langstone School / Nursey	Sports pitches and grassland	Langstone School	Green area associated with school and nursery		
46	United Services Recreation Ground	Sports pitches and grassland	The Crown	Home ground of Royal Navy with election of sports pitches including cricket and hockey. Used by other local sports clubs	Yes	PCS13 - protected open space
47	HMS Temeraire Sports Ground	Sports pitches	MOD	Selection of sports pitches		
48	Victoria Park	Parkland and trees	PCC	Park of historical significance with memorials, café, playground and trees. There is an ongoing restoration project for this park	Yes	PCS13 - protected open space PCS23 - design and conservation Registered Park & Garden
49	N/A	Grassland	University of Portsmouth (likely)	Grassland area likely associated with university		
50	N/A	Parkland	Unknown	Park with playground		
51	Lime Tree Park	Parkland	Unknown	Small park with playground and SUDs features	Yes	
52	Ravelin Park	Parkland	University of Portsmouth	Well-maintained park of historical significance with trees. Formed part of 18/00647/FUL for the University of Portsmouth's new sports centre, which included enhanced landscaping. The sports centre opened in 2023.	Yes	PCS13 - protected open space
53	The Victory Stadium	Sports pitch	Royal Navy	Football stadium		
54	University Library Garden	Grassland	University of Portsmouth	Small grassland area with trees		
55	Gun House Green	Grassland	University of Portsmouth	Grassland associated with student union		
56	Landport Park	Parkland	PCC	Park with adventure playground and Naims court		
56	St Marys Church (likely)	Grassland	St Marys Church (likely)	Grassland likely associated with church		
57	Olinda Street Park	Parkland	PCC	Small park		
59	Portsmouth Academy Grounds (likely)	Sports pitches	Portsmouth Academy (likely)	Selection of sports pitches likely associated with Portsmouth Academy		

60	Lake Road Park	Parkland	PCC	Linear park with playground		
61	Little George Street Playground	Parkland	PCC	Small park with playground		
62	N/A	Grassland	Unknown	Green space outside houses		
63	ARK Dickens Primary Academy Grounds (likely)	Grassland	ARK Dickens Primary Academy (likely)	Grassland with playground likely associated with ARK Dickens Primary Academy		
64	N/A	Grassland with trees	Unknown	Green corridor possibly associated with Royal Albert Day Centre and/or primary school		
65	N/A	Grassland with trees	Unknown	Small green space possibly associated with surrounding houses		
66	N/A	Grassland with trees	Unknown	Small green space possibly associated with surrounding houses		
67	Cornwallis Community Orchard	Sports pitch, grassland and orchard	Dennis David	Community planting space with tarmac sports pitch		
68	N/A	Parkland	Unknown	Park with pavillion		
69	N/A	Grassland	Unknown	Small square of grassland		
70	N/A	Grassland	Unknown	Grassland with a tarmac area		
71	N/A	Grassland	Unknown	Small square of grassland		
72	Buckland Park	Parkland	PCC	Park with playground, basketball court, informal football pitch and tree planting. Adjacent to Buckland Adventure Playground and splash pool	Yes	PCS13 - protected open space
73	Possibly Baltic House Orchard	Grassland	Unknown	Area of grassland next to roundabout		
74	N/A	Grassland and scrub	Unknown	Small area of green space next to Angling Club, south of Stamshaw playground		
75	Upper Church Path Playground	Grassland	PCC	Small grassland patch with playground and football goal		

Appendix 2

Google maps walking routes



Key

Suggested route ●●●●●

Project: Tipner West - SPA
Recreational Disturbance
Mitigation Study

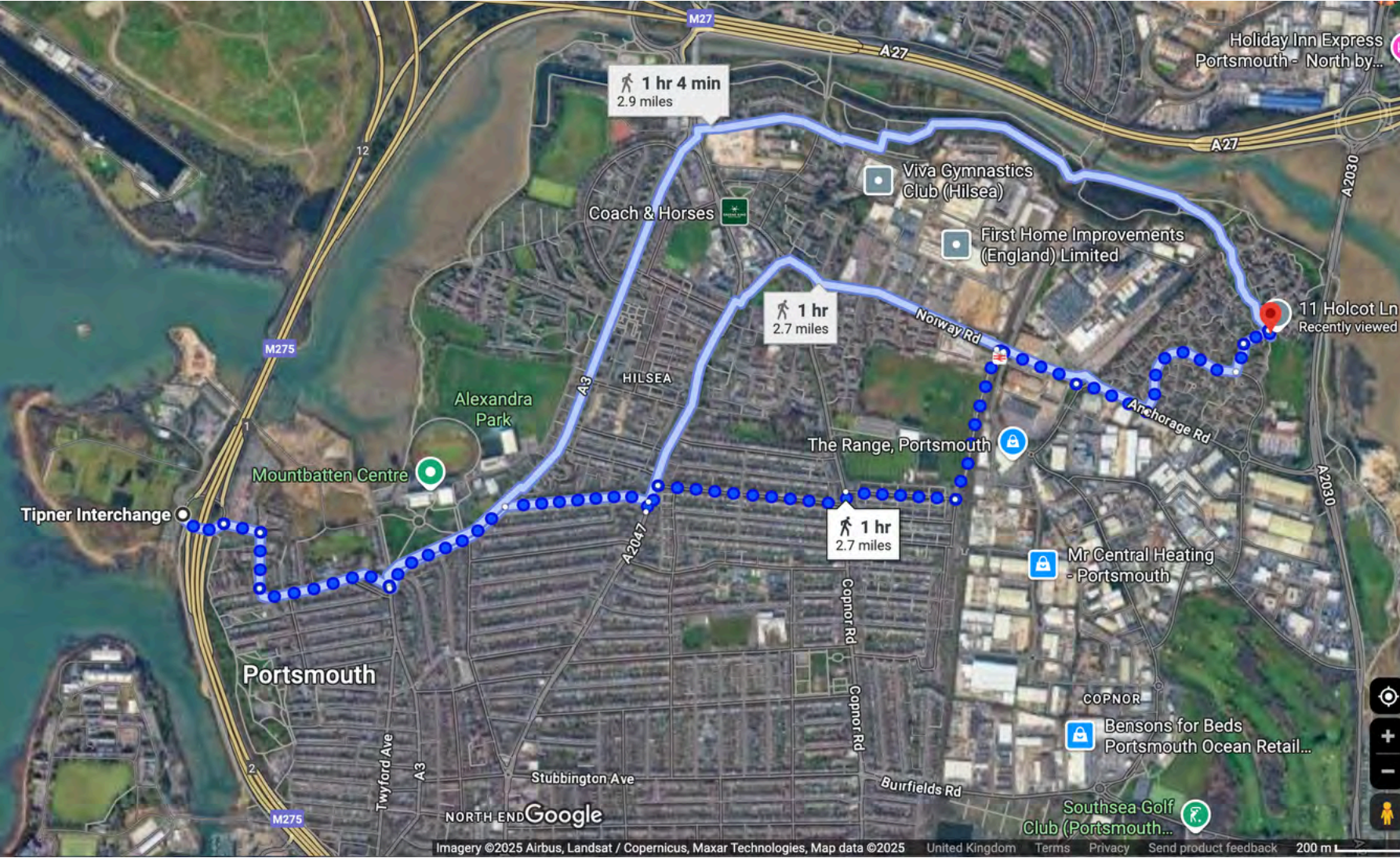
Map title: Walking distance to
Alexandra Park from Tipner West

Client: Portsmouth City Council

Date: 11/08/25

Google Satellite
Imagery ©2025 Airbus, Maxar Technologies,
Map data ©2025





Key

Suggested route ● ● ● ● ●

Alternative routes —

Project: Tipner West - SPA
Recreational Disturbance
Mitigation Study

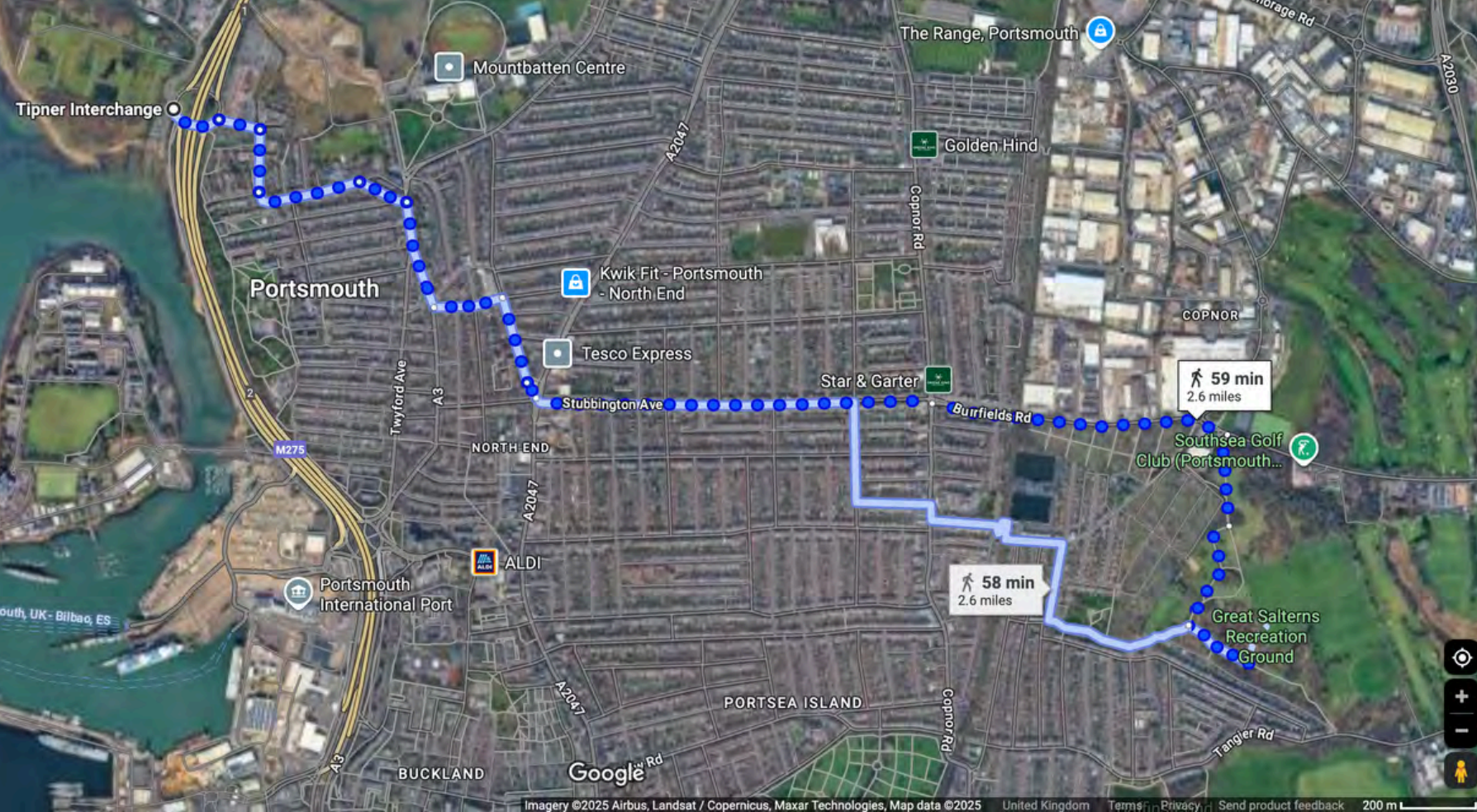
Map title: Walking distance to
Anchorage Park from Tipner
West

Client: Portsmouth City Council

Date: 11/08/25

Google Satellite
Imagery ©2025 Airbus, Landsat / Copernicus,
Maxar Technologies, Map data ©2025





Key

Suggested route ●●●●●

Alternative routes —

Project: Tipner West - SPA
Recreational Disturbance
Mitigation Study

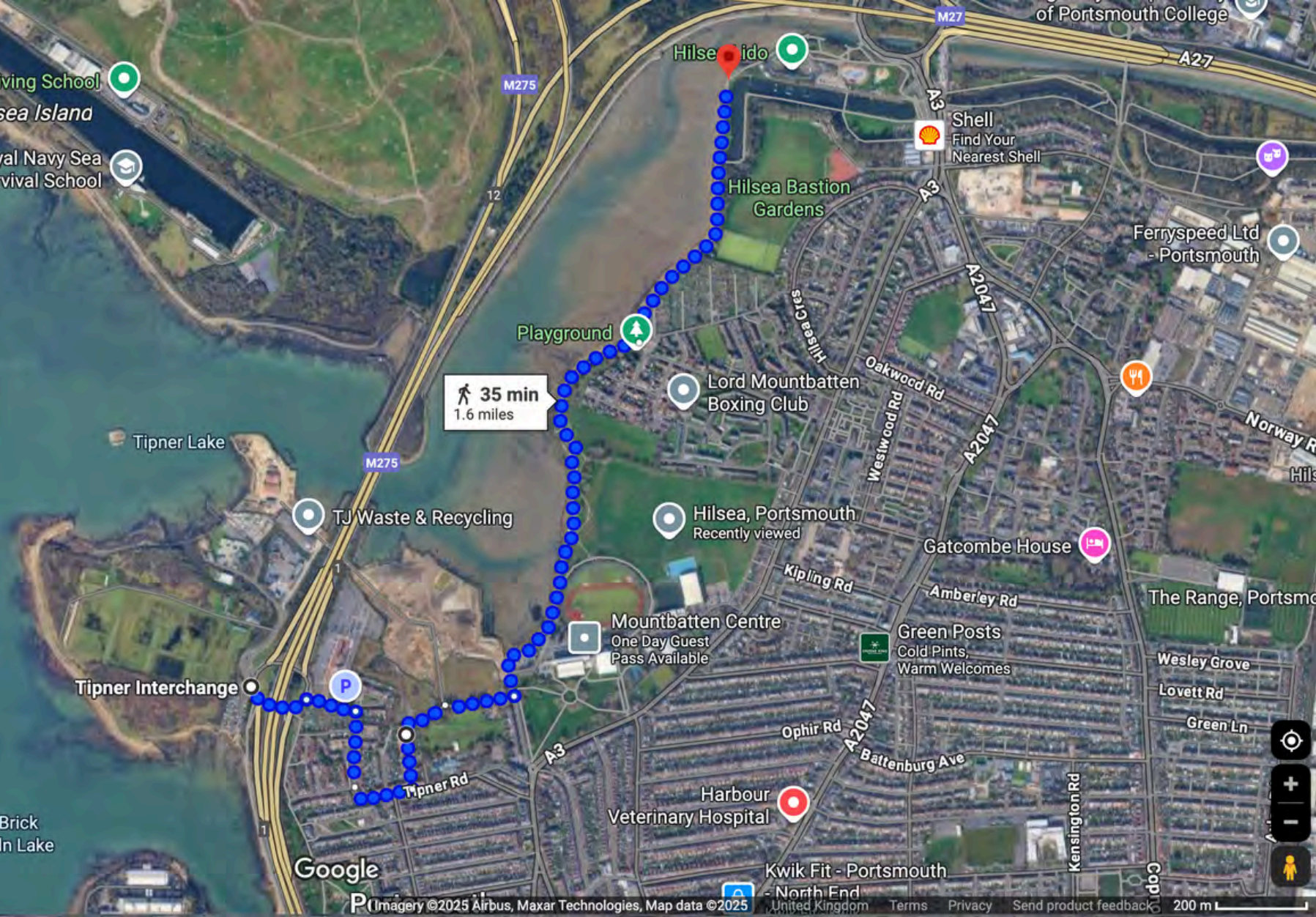
Map title: Walking distance to
Great Salterns from Tipner West

Client: Portsmouth City Council

Date: 11/08/25

Google Satellite
Imagery ©2025 Airbus, Landsat / Copernicus,
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Key

Suggested route ●●●●●

Project: Tipner West - SPA
Recreational Disturbance
Mitigation Study

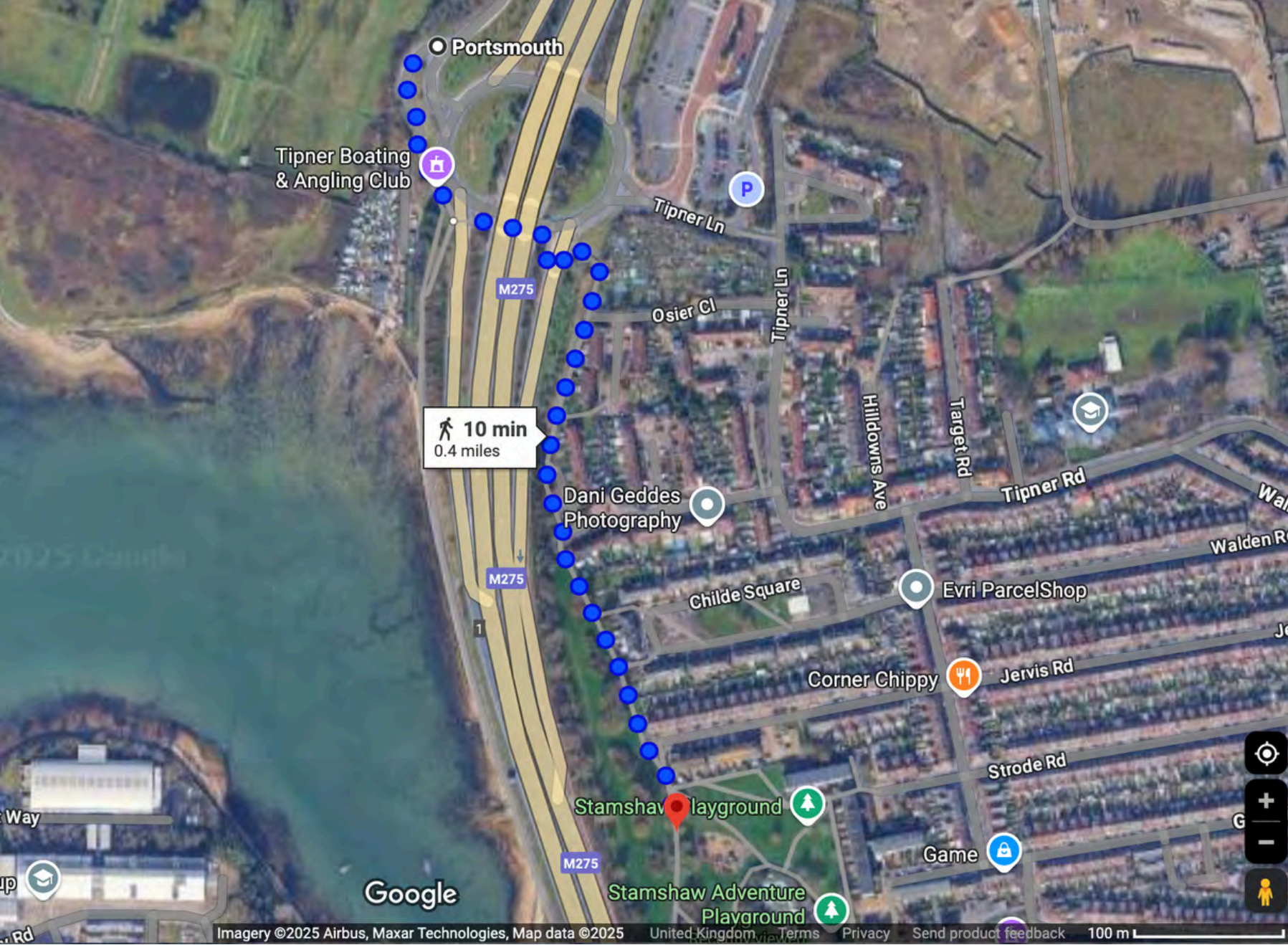
Map title: Walking distance to
Hilsea Lines from Tipner West

Client: Portsmouth City Council

Date: 11/08/25

Google Satellite
Imagery ©2025 Airbus, Maxar Technologies,
Map data ©2025





Key

Suggested route ●●●●●

Project: Tipner West - SPA
Recreational Disturbance
Mitigation Study

Map title: Walking distance to
Stamshaw Park from Tipner West

Client: Portsmouth City Council

Date: 11/08/25

Google Satellite
Imagery ©2025 Airbus, Maxar Technologies,
Map data ©2025



Appendix 3
City of Portsmouth Parks, Gardens and Open Spaces



City of Portsmouth

Parks, Gardens and Open Spaces

1. Portsdown Hill

The largest area of open space of which 30 hectares is designated as a Site of Special Scientific Interest. The Hill rises to a height of 125 metres and affords spectacular views across the Solent to the Isle of Wight and northwards over Hampshire's rolling countryside. Portsdown is an area of wildlife and historic importance. The 19th century forts positioned along the top of the hill provide a fascinating insight into the area's military history. Forts Purbrook and Widley are currently occupied by the Peter Ashley Activity Centres. A wide variety of plants and animals (particularly butterflies) thrive on the chalk grassland and include some species not commonly found elsewhere in Britain. On the hill you will find plenty of car parking space and a variety of trails to follow.

2. Fort Purbrook

3. Hempsted Green / Collington Crescent Open Space

Green corridor from Allaway Avenue to Leominster Road.

4. Watersedge Park

Community centre with children's play area and ball court for 5-a-side and basketball.

5. Allaway Avenue and the Grove Club

Playing field with football pitches, large play area, floodlit ball court and skate park. Community centre with floodlit kickabout area in Marsden Road.

6. Credenhill Play Area

Open space with play area.

7. Tunstall Play Space

Play area, grass kickabout and exciting, contoured BMX track.

8. Sevenoaks Road

Multi-court, children's play area, skate ramp and adjacent playing fields.

9. Waterworks Field Play Area

Neighbourhood park with play area and ball court.

10. Coastal Path

Interesting coastal path from Horsea Island to Portchester Castle, with views across Portsmouth Harbour SSSI (Site of Special Scientific Interest).

11. Port Solent

Large grassy area adjacent to Port Solent Marina with views across the harbour to Portchester Castle.

12. Gurnard Road

Children's play equipment, BMX track and kickabout area.

13. King George V Playing Fields

Large area of open space with football pitches and venue for major Guy Fawkes bonfire and fireworks display.

14. Cosham Park

Bowling greens, tennis courts and play area - attractive mature flowering cherry trees along eastern boundary.

15. Knowsley Road

Neighbourhood park with play area.

16. Hawthorn Crescent

Community Centre and children's play area with kickabout area.

17. Drayton Park

Large park with quality cricket square, football pitch, bowling green, children's play area and informal BMX track.

18. Farlington Playing Fields

Large area of open space with football pitches and cricket squares.

19. Zetland Field

Open space with children's play area and ball court.

20. East Lodge Play Area

Open space with children's play area and ball court.

21. Hilsea Lido

New splashpool with free access, adjacent to a children's play area.

22. Hilsea Lines

This is a fascinating area of 19th century fortifications comprising a moat and defensive walls and embankments that are now overgrown with woodland. The site now covers 200 acres and stretches along the northern edge of Portsea Island connecting the eastern and western coastal walks. The paths around the lines offer delightful and peaceful walks close to the busy city and provide easy access to this area's varied and interesting wildlife. Recent improvements with Heritage Lottery grant funding.

23. Anchorage Park

Linear park through housing estate linking the eastern coastal path with Hilsea Lines. Large open space with football pitch, children's play area and community centre.

24. Farlington Marshes

This is a large area that was reclaimed from the sea in 1770 by the Lord Mayor of Farlington and is now a Site of Special Scientific Interest (SSSI) which was designated as a local Nature Reserve in 1974. The reserve is leased to and managed by the Hampshire and Isle of Wight Wildlife Trust. Public access along the coastal path offers excellent views of Langstone Harbour and is ideal for appreciating the area's fascinating wildlife inhabiting the pools and water meadows.

25. Tipner Coastal Path and Cycle Route

Coastal path and cycle route linking Hilsea Lines and Alexandra Park, with views across Tipner Lake.

26. Midway Road

Neighbourhood play area and ball court

27. John Wesley Gardens

Pleasant open space with children's play equipment and kickabout area. A memorial here marks the position where John Wesley preached beneath an elm tree in the 18th century.

28. Alexandra Park and Mountbatten Centre

Major park with extensive sporting facilities including regional Sports Centre, athletics track, all-weather pitch, tennis, netball, basketball, 5-a-side football, cricket, bowls and children's play area.

29. Gatcombe Gardens

Attractive historic park with 'folly' and small formal garden. The folly is a small 19th century domed temple and comes from the Italianate gardens at Critcheldown in Dorset. It was erected in its present location in the early 1970s. In 1809 Gatcombe House was the residence of Sir Roger Curtis, the Commander In Chief of the armed forces in Portsmouth. It later became the officers' mess of Hilsea Barracks and is now the headquarters of a local company.

30. Stamshaw Foreshore Coastal Path

31. Stamshaw Park

Large park laid out during the 1970s on land reclaimed from the sea as part of the M275 motorway construction. Children's play equipment plus supervised adventure playground, kickabout area and skate park.

32. College Park

Traditional park and flower gardens, pets corner, bowls and children's play area.

33. Buckland Park

Neighbourhood park with children's play equipment, multi-court and supervised community play centre.

34. Teignmouth Road Play Area

Play area and ball court.

35. Great Salterns Golf Course

18 hole golf course with floodlit driving range, open to the public.

36. Portsea Venture Playground

Supervised community play centre with indoor facilities and adventure playground.

37. Victoria Park

A traditional City Centre park dating from 1878 and originally known as "The Peoples Park". It has many mature trees, flower gardens, play area, aviary, pets corner and interesting monuments. The park is close to the Guildhall and the railway station.

38. Arundel Gardens

Small gardens near the city centre.

39. Landport Adventure Playground

Supervised community play centre with indoor facilities, adventure playground, kickabout area and junior play area.

40. St. Mary's Churchyard

41. Kingston Park

Large open space with 5-a-side football, children's play area, BMX track and ball court.

42. Kingston Cemetery

Large historic cemetery with the first burial in January 1856. The area has many attractive mature trees, fine monuments and pathways, which provide pleasant and interesting walks.

43. Milton Cemetery

Historic cemetery with the first burial in April 1912. The area has many attractive mature trees, fine monuments and pathways, which provide pleasant and interesting walks.

44. Tamworth Field

Large area of open space, with areas of native planting, a wildlife pond and children's play area. The Stacey Community Centre with floodlit ball court adjacent to the park.

45. Baffins Pond

Extensive open space with children's play area and pond with many wildfowl. The area has undergone a phased programme of improvements intended at improving the pond's water quality, reed bed establishment and other water plants to create a more diverse habitat to encourage a wider range of flora and fauna.

46. Milton Common

Expansive coastal open space, reclaimed from the sea by tipping from the 1950s up to 1970. It has been encouraged to develop into a natural area which has become significant for nature conservation. A network of informal paths provide good access around the area and to the Langstone Harbour Coastal Path.

47. Langstone Coastal Path

This path follows the eastern shore of Portsea Island from Eastney, via Milton Lock to Hilsea Lines offering fine views across Langstone Harbour and Farlington Marshes.

48. Somerstown Play Areas

Play areas for the local community.

49. Milton Park

Major established park purchased by the City Council in 1912. It was formerly part of Milton Farm and the original thatched barn still stands. The park has many mature trees and shrub borders and a number of facilities including floodlit tennis, netball, basketball and football courts, bowling greens, skate park and a large children's play area.

50. White Cloud Gardens

A small, secluded, almost secret garden.

51. Highland Road Cemetery

Historic cemetery with the first burial in November 1856. The area includes fine mature trees and monuments and the pathways provide pleasant and interesting walks.

52. Prince Albert Road Play Area

Play area and ball court.

53. Bransbury Park

Large park purchased by the City Council in 1911 is mainly laid out as sports pitches. The area also includes a flower garden, children's play area, skate park, miniature railway and floodlit sports area for netball, tennis and 5-a-side football.

54. Kings Bastion and Pembroke Gardens

A grassy open space which is adjacent to historic fortifications which offer commanding views of the Solent across to the Isle of Wight.

55. Southsea Common

Extensive open space that was purchased by the City Council from the War Department in 1922. Some of the mature trees date from 1910. The area is adjacent to the popular seafront promenade and beach, which is ideal for kite flying, picnics and informal ball games. Facilities also include a children's play area, splashpool (with free access), beach volleyball, tennis, crazy golf, pitch and putt and is home to Southsea Skatepark. There are many paths including the Ladies Mile which is flanked by attractive spring bulbs. Southsea Common is the main venue for outdoor events throughout the year.

56. West Battery Gardens

A grass amphitheatre formed by the West Battery fortifications of Southsea Castle. This pleasant space with fine sea views is ideal for relaxation, picnics and many events at the Bandstand.

57. Castle Field

Castle Field is the open grass area between Southsea Castle, the Pyramids Centre and the D-Day Museum. There are attractive flower gardens leading up to Southsea Castle and the East Battery fortifications give good views across the Solent to the Isle of Wight.

58. The Rock Gardens

Very attractive, sheltered gardens close to the seafront with a wide variety of interesting plants, waterfall and pools. A popular sun-trap with many places to sit and relax.

59. Burgoyne Gardens

Attractive floral gardens with interesting herbaceous borders and plenty of places to sit.

60. Clarendon Gardens

An attractive traditional park within one of the Southsea conservation areas. The swathes of daffodils are spectacular in springtime.

61. Wimbledon Park

A neighbourhood park with children's play area, ball court and adjacent sports centre.

62. Waverley Gardens

A classic city square. The spring bulbs are particularly attractive.

63. The Dell

Prestigious formal bedding display.

64. The D-Day Memorial Garden

65. Canoe Lake

Extremely popular park dating from 1886 with some of the existing mature evergreen oaks planted in 1910. The park has many attractions including boating lake, café, children's play area with splashpad, putting green, pitch and putt, bowling, grass tennis courts, St Helen's field (cricket), Southsea Rose Garden, floral bedding displays and model village.

66. The Promenade

Seafront walk from the harbour entrance through Old Portsmouth and along the historic seafront fortifications, past South Parade Pier to Eastney beach.

67. The Beach

Popular beach stretching along the south coast of Portsea Island from Old Portsmouth to Eastney.

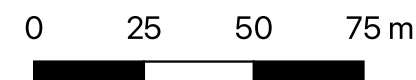
Appendix 4

Photographs of site context



Key

- Photograph locations



Project: Tipner West - SPA
Recreational Disturbance
Mitigation Study

Title: Photograph locations

Client: Portsmouth City
Council

Date: 16/09/25

Google Satellite
Imagery ©2025 Airbus, Maxar
Technologies, Map data ©2025



Photo 1a
People using coastal path



Photo 1b
Cyclist using coastal path



Photo 1c
Steps to sea wall, infrastructure and people using coastal path



Photo 1d
Height of sea wall compared to person



Photo 1e
Height of people above intertidal zone



Photo 1f
View over sea wall



Photo 2a
Signage along coastal sea wall path



Photo 2b
Signage along coastal sea wall path



Photo 2c
Bench and other side of sign



Photo 2d
Climbing infrastructure installation



Photo 2e
Signage, bike stands and benches



Photo 2f
Two benches and dog poo bin



Photo 2g
Interactive installation along sea wall



Photo 3a
Alexandra Park



Photo 3b
Alexandra Park



Photo 4a
Mountbatten centre and large car park



Photo 4b
Mountbatten centre sports facilities



Photo 4c
Back of Mountbatten centre and park

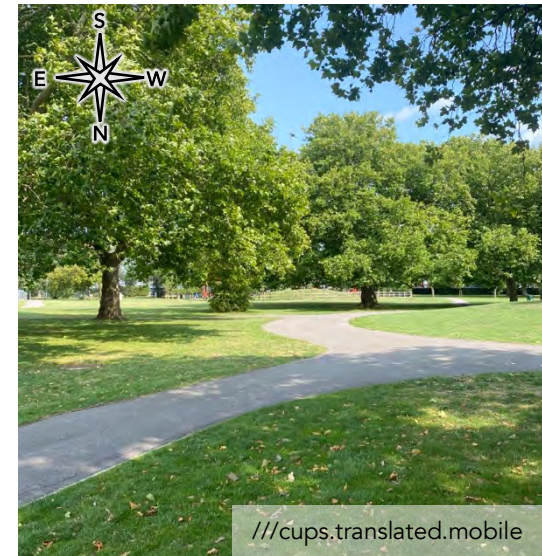


Photo 5a
Park to the south of Mountbatten centre



///gladiators.probe.worm

Photo 5b

New tree planting in park south of Mountbatten centre



///wipes.learns.crazy

Photo 5c

Benches in park south of Mountbatten centre



///chins.gasp.stores

Photo 5d

Dog poo bin in park south of Mountbatten centre

Appendix 5

Extract from Design & Access Statement for Victory Quay



Appendix 6

List of references and resources used for review of coastal strategies to address recreational pressure

List of references and resources used for review of coastal strategies to address recreational pressure

- <https://www.exe-estuary.org/publications/exe-estuary-management-plan/>
- <https://www.north-norfolk.gov.uk/tasks/planning-services/development-management/habitat-mitigation-recreational-impacts/>
- https://www.north-norfolk.gov.uk/media/7417/girams_strategy_march_2021.pdf
- <https://www.north-norfolk.gov.uk/media/11146/norfolk-rams-action-plan.pdf>
- <https://downloads.eastriding.org.uk/corporate/pages/humber-strategic-access-management-and-mitigation-strategy/Humber%20Strategic%20Access%20Management%20and%20Mitigation%20Strategy.pdf>
- <https://www.footprint-ecology.org/reports/Liley%20et%20al.%20-%202014%20-%20South-east%20Devon%20European%20Site%20Mitigation%20Strategy.pdf>
- <https://www.footprint-ecology.org/reports/Liley%20and%20Tyldesley%20-%202013%20-%20Solent%20Disturbance%20and%20Mitigation%20Project%20Phase%20II.pdf>
- https://www.dorsetcouncil.gov.uk/documents/35024/287676/phr1_SPD.pdf/e3a7c919-571b-aff6-6259-f37f90395686
- <https://www.doverdistrictlocalplan.co.uk/uploads/Submission-Documents/NEEB04a-Thamet-Coast-and-Sandwich-Bay-SPA-SAMM-Strategy-Final-Rev-1.1-March-2023.pdf>
- <https://northkent.birdwise.org.uk/wp-content/uploads/2018/02/Mitigation-Strategy.pdf>
- <https://stroud.moderngov.co.uk/documents/s12093/AgendaItem9-AppendixA-SevernEstuaryMitigationStrategy.pdf>
- <https://www.basildon.gov.uk/media/10331/Essex-Coast-Recreational-Disturbance-Avoidance-and-Mitigation-Strategy-Habitats-Regulations-Assessment-Strategy-2018-2038/pdf/Essex%20Coast%20Recreational%20Disturbance%20Avoidance%20and%20Mitigation%20Strategy%20-%20Habitats%20Regulations%20Assess.pdf?m=1605023772207#:~:text=1.1%20The%20Essex%20coastline%20stretches,as%20part%20of%20the%20European>

Appendix 7
Minutes of Regulatory Panel
28th August 2025

MINUTES AND ACTIONS

Meeting Title: **Tipner West Regulatory Panel 2025 - Meeting 3**
Date: **28th August 2025 @ 1030am- 12pm**
Location: **Remote Meeting via Microsoft Teams**

Attendees:

Regulator/LPA/Non-Statutory Interest Groups - Coastal Concordat	Promoter Team (PT)
Nick Lloyd-Davies (NLD) - PCC (LPA) (Chair)	Kevin Hudson (KH)
Lucy Howard (LH)- PCC (LPA)	
Tom Bell (TB) - PCC (LPA)	
Ben Cracknell (BC) - PCC (LPA)	
Nicola French (NF)- PCC (Consultant to LPA:Ecology)	
Hilary Ferres (HF) - Coastal Partners	
Jonathan Shavelar (JS) - NE	
Laura Lax (LL) - EA	
Jemma Colwell (JC) - EA	
Carrie Marchbank (CM) - RSPB	
Hannah Terrey (HT) - HIWWT	

[Note: A Recording of this meeting is available]

No.	Agenda Item	Who	Minutes, Advice, Actions	Who - Due By
1	Introductions and Agreement of Previous Minutes/review of actions	NLD	NLD opened the meeting. Apologies received from Alex Bellisario (HE), Linda Brewis (MMO), Amy Adams (Coastal Partners), Heather Richards (RSPB), David Hodges (PCC-LPA) NLD alluded to the previous Panel meeting from June 2025 and associated actions which had been completed. <u>Action: NLD agreed to circulate the updated Panel Working Protocol in case some had not received this.</u> The Minutes were agreed.	NLD - ASAP
2	Local Plan Addendum and new draft Tipner West policy PLP3	LH/NLD	LH provided an update on the draft Local Plan Addendum which had been shared with Panel members ahead of the meeting. The Addendum and associated evidence base has been prepared in a six month period since the first IROPI Opinion, which is swift. The LPA has added a Preface to the Addendum to explain its structure and the reasons for its preparation. As part of the Pre-Submission consultation a consolidated updated Pre-Submission Plan will be prepared. Submission will also importantly precede proposed Mayoral elections and local elections in May 2026. Updated HRA and SA are nearing completion and the Appropriate Assessment is concluding that any identified adverse effects upon the SPA/Ramsar sites can be mitigated and that Stage 3 Derogation is not now required. LL queried the Reg 19 timeframes. LH advised that this would commence in November and run for 6 weeks. Papers for Cabinet (25th September) and Full Council (14th October) approval of the Addendum for consultation will be available from 17th September on the Council website. CM considered the draft policy is much improved and there is much to welcome. Noting a few typo corrections, CM added that RSPB would wish to see a commitment in the policy to the restoration to favourable condition of land south of the firing range (terrestrial SPA/Ramsar). CM also noted that the draft supporting text for the Tipner West policy had made specific reference to the possible need for project-level Derogation, which seemed an unnecessary reference (and something absent from other site allocation supporting text). The Habitats Regulations would need to be complied with by any	

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			developer taking forward sites at the project-level so it was unusual for the text supporting draft policy PLP3 to make specific reference, given the amendments made to the policy, precluding adverse effects that can't be mitigated. Action: LH and NLD agreed that the supporting text would be reviewed. NLD added that additional wording was already being added to the draft policy to require applicants to submit a management and monitoring strategy for LSFR and this would provide a 'tool' to secure such improvements, notwithstanding the City Council statutory obligations relating to this designated habitat. JS agreed that it was important for the policy to secure appropriate management and monitoring measures for the terrestrial SPA/Ramsar at Tipner West. CM noted that the RSPB would be keen to see the updated HRA when ready. CM was keen to understand the mitigation approach to the potential loss of functional supporting habitat on the firing range eg. at Horsea Island? JS noted that Natural England were satisfied that this mitigation could be addressed at the project level and noted that the existing Pre-Submission Plan had already addressed this satisfactorily (PLP42). JS agreed that identifying this mitigation was important as it can be difficult to find suitable replacement habitat. LH confirmed that the HRA would be published alongside other Cabinet/Full Council papers on the 17th September.	NLD - ASAP
3	Local Plan - IROPI Opinion - Updated version received 31 st July 2025	NLD/LH	NLD talked through the presentation that summarised both the first and most recent IROPI Opinions (dated 28th February and 31st July respectively). <i>[The presentation slides accompany these distributed Minutes.]</i> CM stated that the RSPB are pleased that the original negative Opinion still stands but with clearer weighing of the reasoning, which is welcomed. With regard to the paragraphs 46 and 47 relating to adverse effects arising from construction/post-construction disturbance and recreational disturbance respectively, CM considered that these concerns read as in reference to the alone/site-specific adverse effects from PLP3, not the wider in-combination impacts that are addressed by the existing strategic mitigations in place (eg. Bird Aware). The details of site-specific bespoke mitigation measures for	

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			these adverse effects are not yet known and, as such, it is considered this is why the Secretary of State has highlighted outstanding concerns on this point. JS stated that he also considered that these paragraphs were alluding to 'alone' impacts but he could not immediately recall the extent of detail on mitigation set out in the HRA to address these adverse effects. NLD stated that the LPA were concerned that the wording of these paragraphs is not clear in its reference to site-specific 'alone impacts', not least due to the reference to city-wide housing and employment sites being delivered over a 15 year timeframe, many such sites being adjacent to the SPA/Ramsar. CM stated that, having been involved in the setting up of the Solent Bird Aware Mitigation strategy, it was always intended to address the wider in-combination effects and not site-specific bespoke measures. Therefore, she remained of the opinion that the Secretary of State was likely referring, in paras 46-47, to these bespoke measures which it seems she did not have enough detail on. JS noted that paragraph 46 was focused on visual and noise disturbance and that this suggested a reference to site-specific bespoke measures that remained unclear. LH stated that she considered the paragraph 46 to be referring to the city-wide housing and employment site over the Plan period. NLD added that generally, the Secretary of State has not had evident regard to mitigation which she should have done prior to issuing an IROPI Opinion. These Panel comments will be taken on board in assessing whether or not further clarifications would need to be sought by the City Council.	
4	Tipner West Recreational Mitigation Strategy Study (Holbury Consultancy)	NF	NF ran through her presentation slides outlining the work completed to identify opportunities for bespoke recreational mitigation measures for Tipner West. <i>[A copy of these slides is distributed with these Minutes and it is not considered necessary to repeat the content here.]</i> JS noted that with regard to controlling public access to the inter-tidal areas, that there are local examples of sea walls with what appear to be possible emergency access steps for health/safety reasons which might undermine	

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			attempts to control/avoid disturbance. HF stated that designers need to provide 'egress' steps in sea walls should anyone get stranded on the inter-tidal areas. It was agreed that these can be designed carefully in terms of placement in less publicly active parts of the sea wall, or directed in such a way that they face away from more sensitive habitat areas. Other examples include flood boards that deter people from attempting to walk down the steps, but don't preclude egress in an emergency. BC noted that signage could also be used to make people well aware such steps for emergency egress only. These are issues of detail and will need to be addressed in due course as part of project design. CM stated that the RSPB/HIWWT had previously agreed that bespoke measures could be possible on the Tipner West site, including areas of pocket parks, green buffers etc that are attractive as alternatives to the foreshore. Attractive walks through the development can certainly be designed to attract users. It would be useful to understand visitor behaviour from local residential areas - there could be merit in a local postal survey to understand their choices. It is possibly likely that people may not be willing to walk to Hilsea Lines from the site. CM also noted that Alexandra Park may be a supporting habitat site for Brent Geese. NF confirmed that it is a Primary Support Area and that her report recognised that this needed to be taken into account. CM thanked the LPA for exploring SANG and recognised that the linear path approach, linking to the England Coast Path, would be positive and could potentially have value as alternative open space. SANG guidelines could be helpful with regard to the design approach for green spaces (eg. around dog-off-lead areas) even if a bespoke SANG approach was not feasible in this location. . JS noted that an access-management approach was appropriate in avoiding alone impacts from recreational disturbance. He added that the design of any egress steps would be key to the function of the access management mitigation strategy. NLD noted that the draft policy PLP3 was now also including more detailed design requirements relating to the sea defences, that reference wayfinding	

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			measures, public lookout areas, and many of the other points addressed in the Holbury Study.	
5	Statements of Common Ground	LH/NLD	NLD advised that the LPA will want to update these so that they relate to the Addendum. LH stated that she accepted that the SCGs would need to align with the comments Panel members make in response to the Reg.19 Consultation. LL confirmed that the EA would wish to finalise a SCG only after/alongside completion of Reg.19 response. LH confirmed that this was acceptable. NLD advised that he may commence first draft templates in the meantime. LH advised that SCGs would not need to be submitted until formal submission of the Plan in March 2026. CM noted that the RSPB considered a SCG may not now be necessary, given that the RSPB/HIWWT may no longer be objecting to the Plan as amended through the Addendum. LH noted that following discussion with PINS, she considered that a SCG was still necessary, in particular given the strong objections raised to the previous draft policy. But the SCG could be very succinct.	
6	PCC Promoter Update	KH	KH stated that the Promoter team are working alongside the Local Plan team to identify the way forward for the Tipner West strategic allocation. The site remains a challenge financially. He noted and agreed that a project level HRA would be required and if necessary address unmitigated adverse effects through a Derogation should this be required. Funding discussions with Government continue with Homes England and other third party developers and marine/maritime businesses. KH added that there would be a FRAP zone, as previously discussed at Panel and that this might not extend around the whole site given the operational needs for the marine employment and access by boats not requiring dredging and the need to have regard to the setting of the Listed Buildings. KH added that the sea wall may not be uniformly a vertical wall, as previously presented to Panel and that any public walkway access through to the subway (under	

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			M275) must be cognisant of possible boat movements on to the Tipner West site, so the overall sea wall is unlikely to be uninterrupted and may vary in its design across the site perimeter.	
7	AOB	ALL	LL queried if it was necessary to discuss the recent questions around flood cells vis-à-vis modelled flooding showing risk to residential homes in Stamshaw. Following a meeting between the EA, Coastal Partners, PCC's Coastal lead Guy Mason and the LPA, it was agreed that there had been a misunderstanding as there exist 'Tipner' and 'Stamshaw' flood cells (# 5 and #6 respectively), the former being impacted by modelled flooding in sea-level rise scenarios and floodwaters from an un-defended Tipner West. Meeting closed.	
SUPPLEMENTARY PANELLIST ADVICE/COMMENT				
None at this meeting.				

Meeting Closed: 12:00pm

Date of Next Meeting: 25th November 2025 @ 2pm

Provisional Panel Topics: