

Sustainability Appraisal (SA) for the Portsmouth Local Plan

SA Report Update (supporting the Local Plan Addendum)

Portsmouth City Council

September 2025

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Quality information

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Revision History

Revision	Revision date	Details	Name	Position
V.0.1	August 2025	First draft for internal review	RC	Principal Planner
V1.0	August 2025	Draft for client review	RC	Principal Planner
V1.3	September 2025	Draft for client review	CB	Associate Director
V2	September 2025	Final for publication	CB	Associate Director
V3	September 2025	Updated final for publication	CB	Associate Director

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1. Introduction

1.1 Introduction to Sustainability Appraisal (SA)

- 1.1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Portsmouth Local Plan. SA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and alternatives, against a framework of sustainability objectives, with a view to avoiding and mitigating adverse effects, and maximising the positives. SA of Local Plans is a legal requirement.¹
- 1.1.2 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004. This identifies that a report (known as the SA Report) must be published for consultation alongside the Local Plan that “*identifies, describes and evaluates*” the likely significant effects of implementing “*the plan and reasonable alternatives*”.² The SA Report must then be considered, alongside consultation responses, when finalising the plan.
- 1.1.3 This SA Report Update has been prepared to accompany the Portsmouth Pre-Submission Local Plan Addendum 2025. The Addendum has been prepared by Portsmouth City Council (PCC) following their decision to prepare a Local Plan that does not cause adverse impacts on international conservation designations that cannot be mitigated. The Pre-Submission Addendum should be read alongside the 2024 Pre-Submission Local Plan, which was consulted on in summer 2024. This SA Report Update and the Portsmouth Pre-Submission Local Plan Addendum 2025 (herein referred to as the Local Plan Addendum) are the subject of a focussed Pre-Submission consultation, due to take place in winter 2025.
- 1.1.4 AECOM has structured this report specifically in a way that is designed to meet the regulatory requirements and be accessible to readers. The report is structured in three parts which aim to answer the following questions in turn:
1. What has plan-making/ SA involved up to this point? (focusing on what reasonable alternatives have been appraised alongside the preferred approach)
 2. What are the SA findings at this stage? (focusing on appraising the Plan being presented at consultation)
 3. What happens next? (what comes next in terms of plan-making and SA)
- 1.1.5 **Appendix A** provides a further explanation of the regulatory basis for answering certain questions within the SA Report, and a checklist explaining more precisely the regulatory basis for presenting certain information.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012) and subsequent revisions (2025). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document. Where legislation is referenced, it should be assumed it is ‘as amended’.

² Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004

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1.2 The Portsmouth Local Plan context

- 1.2.1 The emerging Portsmouth Local Plan is at a relatively advanced stage of plan-making, and the Local Plan Addendum will consult on the final strategy changes being made to the Local Plan before it is submitted for examination.
- 1.2.2 This SA Report Update accompanies the Local Plan Addendum for consultation. It will subsequently be submitted for examination alongside the Local Plan. A Non-Technical Summary is available separately.
- 1.2.3 Once adopted, the Portsmouth Local Plan will set out a framework to guide and shape development in Portsmouth up to 2040. It will replace the Portsmouth Plan (Portsmouth Core Strategy) adopted in 2012, the two Area Action Plans for Southsea Town Centre (2007) and Somerstown and North Southsea (2012), and the saved policies from the Portsmouth City Local Plan (2006).
- 1.2.4 In terms of a vision for the Local Plan, this is aligned with the Portsmouth 2040 Vision³ which was adopted in 2021, and is as follows:

“In 2040 Portsmouth will be an island city with an incredible waterfront, a rich cultural heritage, and a strong maritime history. With a naval base, international port, and strong links across the south, we are the centre of culture and enterprise for our area. In 2040 we are very proud of Portsmouth, how we behave towards each other and how it feels to live here.”

- 1.2.5 Six strategic objectives have been developed from this high-level vision, and these objectives are considered as stepping stones between the vision and the Local Plan policies. The six objectives have not been changed by the Local Plan Addendum, they are:
- A healthy and happy City: we do everything we can to enhance wellbeing for everyone in our City by offering the education, care and support that every individual needs for their physical and mental health. All our residents and communities live in good homes where they feel safe, feel like they belong, and can thrive.
 - A City rich in culture and creativity: people in Portsmouth enjoy a vibrant cultural scene that makes the most of our location, our heritage, and our creative energy. We are full of things to do and places to be, welcoming locals and visitors with diverse events, attractions and venues that positively benefit our people and our City. We are known locally, regionally, and internationally as a great waterfront and City destination that brings people together.
 - A City with a thriving economy: Portsmouth supercharges local businesses and entrepreneurs and attracts investment nationally and internationally from businesses of all sizes. We build strong partnerships between employers and people to develop an excellent skills base and offer brilliant career opportunities to young people, students and adults, growing a better future for us all.

³ [Imagine Portsmouth 2040 Vision](#)

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- A City of lifelong learning: our young people are encouraged to develop high, positive aspirations, and are fully invested in to make the most of their talent and potential. Adults have a wide range of education opportunities to choose from at every stage of life that empower them and enrich their lives.
- A green City: we have excellent air quality because of our green spaces and sustainable transport, and this means our people live healthy and active lives. We are carbon neutral, use renewable energy and actively work to address climate change. We protect and enhance both our land and maritime environment for future generations.
- A City with easy travel: fewer journeys are made by car because we have excellent public transport connections between bus, train, cycling and walking routes, making it easier and more enjoyable to be out and about. We encourage and support more walking and cycling, and we make it easy for people to travel regionally, nationally and internationally for work and pleasure.

1.3 Introducing the scope of the SA

- 1.3.1 The scope of the SA is represented by a framework of sustainability issues/objectives that should be a focus of, and provide a structure for assessments in, the SA. Further evidence informing the scope of the SA (a context and baseline review) is linked in **Appendix B**. Scoping information has been updated as necessary at each stage of plan-making.
- 1.3.2 The Environmental Assessment of Plans and Programmes Regulations 2004 require that “*when deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e., the SA scope], the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.⁴ As such, these authorities were consulted on the SA scope in 2017. Whilst the SA scope has evolved as new evidence has emerged, the underlying objectives remain appropriate and are fundamentally the same as those agreed through the dedicated scoping consultation in 2017. The agreed objectives are summarised in the SA framework in Table 1.1.

⁴ In accordance with Article 6(3).of the SEA Directive, these consultation bodies were selected because ‘*by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.*’

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Table 1.1: SA framework

SA Objective	Assessment Criteria	Potential Indicators
SA-1: Building a strong, competitive economy in Portsmouth SA themes: <i>Population</i> <i>Human Health</i>	Will it provide new employment floorspace? Will it tackle income/employment deprivation and promote social equity? Will it help with diversification of the economy? Will it provide learning, training and skills? Will it support tourism?	– Amount of new employment floorspace – Amount of vacant employment space – Reduction in unemployment levels – Employment per economic sector – Improvement in educational attainments – Amount of visitor spend – Business start ups
SA-2: Ensuring the vitality of the city centre and other town centres in Portsmouth SA themes: <i>Population</i> <i>Human Health</i> <i>Material Assets</i>	Will it contribute to the vitality of city, town, District and Local Centres? Will it create new retail / leisure / employment / housing / office development in the city centre?	– New retail/leisure/office development in the centres – Change in Portsmouth's position in the national retail rankings – Reduction in retail vacancy rates in the city centre and other key centres
SA-3: Promoting sustainable transport in Portsmouth SA themes: <i>Air</i> <i>Climatic Factors</i> <i>Human Health</i> <i>Population</i>	Will it have easy and safe access from homes to shops and services? Will it reduce air pollution? Will it encourage walking and cycling to create a healthier city? Will it encourage public transport?	– Achieving a modal shift and decrease in commuter car use in the city – Decrease in amount of and/or severity of AQMAs – Increase in new cycle routes
SA-4: To tackle climate change, flooding and coastal change in Portsmouth SA themes: <i>Population</i> <i>Human Health</i> <i>Climatic Factors</i> <i>Water</i> <i>Material Assets</i>	Will it include climate change mitigation or adaptation measures? Will it contribute to coastal flood risk mitigation measures? Will it include surface water management and/or water consumption and efficiency measures?	– Decrease in Portsmouth's greenhouse gas emissions – Planning applications approved in accordance with climate change mitigation or adaptation related policies – Achievement of BREEAM Excellent – Progress on flood defences being built – No change or reduction in the level of water stress
SA-5: Delivering high quality homes in Portsmouth SA themes: <i>Population</i> <i>Human Health</i> <i>Material Assets</i>	Will it provide homes to meet the diverse housing needs of the city, recognising the constraints to housing land supply in Portsmouth? Will the needs of the ageing population be taken account of? Will this help replace poor quality housing stock?	– Proportions of housing types – Amount of homes suitable for or capable of adaptation to elderly/disabled use – Redevelopment or improvements/upgrading old housing stock – Amount of homes that meet or exceed the minimum space standards

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SA Objective	Assessment Criteria	Potential Indicators
	Does it provide homes that meet minimum space standards?	
SA-6: To promote healthy communities SA themes: <i>Air</i> <i>Human Health</i> <i>Population</i>	Will it have/improve access to health and community facilities and other services? Will it improve access to open space and/or healthy lifestyles? Will it benefit deprived communities? Will it help reduce crime?	– Distance to facilities – The amount of super output areas in Portsmouth – The amount of residents classified as obese or excess weight – New layouts designed to Design Out Crime standards
SA-7: Conserving and enhancing the historic townscape SA themes: <i>Cultural Heritage</i> <i>Material Assets</i>	Will it protect and enhance the historic/ cultural townscape and assets? Will it provide for increased access to and understanding and enjoyment of the historic environment?	– The number and proportion of heritage assets and Conservation Areas on the Historic England Heritage at Risk Register – Buildings of historic interest given a new use/restored
SA-8: Requiring good urban design in Portsmouth SA themes: <i>Human Health</i> <i>Material Assets</i>	Will it secure good urban design?	– The amount of Planning Applications refused on urban design terms – The amount of tall buildings refused for being outside the areas of opportunity for tall buildings – Any new developments winning an urban design award
SA-9: Conserving and enhancing the natural environment in Portsmouth SA themes; <i>Biodiversity</i> <i>Fauna</i> <i>Flora</i> <i>Material Assets</i> <i>Landscape</i> <i>Soil</i> <i>Water</i>	Will it protect and/or enhance the local ecological systems? Will it protect and/or enhance green infrastructure and/or open spaces in the city?	– Loss of greenspace/increase in greenspace – Condition of SPAs and SSSIs in Portsmouth – Any schemes to enhance biodiversity – Creation of pocket parks on schemes of 50 plus homes
SA-10: Facilitating the sustainable use of natural resources in Portsmouth SA themes: <i>Human Health</i> <i>Climatic Factors</i> <i>Population</i> <i>Landscape</i>	Will it contribute to reducing waste generation and/or diverting waste from landfill? Will it contribute to the reuse / recycling of minerals resources? Will it avoid unnecessary sterilisation of safeguarded minerals and waste infrastructure or mineral resources, or encroachment from incompatible land uses?	– Arisings, treatment and movement of waste – Secondary and recycled aggregate capacity/ sales – Planning applications granted contrary to an objection from HCC on minerals and waste infrastructure or mineral resource safeguarding grounds

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Part 1: What has plan-making/ SA involved up to this point?

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2. Introduction to Part 1

2.1 Context

- 2.1.1 In line with regulatory requirements, there is a need to explain how work was undertaken to develop and then appraise reasonable alternatives to the preferred approach for the Local Plan, and how the Council then considered the appraisal findings when finalising the plan.
- 2.1.2 This part of the report presents information regarding the consideration of reasonable alternatives, with alternatives to date having explored both the spatial strategy and the policy framework. This report builds on previous SA work which to date has included the following (in terms of options assessment):
- Issues and Options Report SA Report (2017) accompanying the Portsmouth Local Plan Issues and Options document for consultation in 2017.
 - Interim SA Report (2021) accompanying the Regulation 18 draft Local Plan for consultation in 2021; and
 - SA Report (2024) accompanying the Regulation 19 Pre-Submission Local Plan for consultation in 2024.
- 2.1.3 This SA Report Update accompanies the Pre-Submission Local Plan Addendum 2025 for further Regulation 19 consultation in 2025 prior to submission of the Portsmouth Local Plan (made up of the Pre-Submission Local Plan 2024 and the Pre-Submission Local Plan Addendum 2025) and this SA Report Update.

2.2 Structure of this part of the report

- 2.2.1 This part (Part 1) of the report is structured as follows:
- **Chapter 3** presents the reasons for selecting the alternatives dealt with at this stage.
 - **Chapter 4** presents a summary of the appraisal of the alternatives; and
 - **Chapter 5** explains the Council's reasons for selecting the preferred approach when considering the alternatives explored.

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3. Establishing reasonable alternatives

3.1 Purpose and structure of this chapter

- 3.1.1 Ultimately, the aim of this chapter is to present “*an outline of the reasons for selecting the alternatives dealt with*”, in accordance with regulatory requirements.
- 3.1.2 It is important to recognise that the SA to date has assessed many different reasonable alternatives that have been defined and refined throughout the plan-making and SA process. This SA Report Update does not seek to repeat any previous assessments, but each iterative report builds upon the last, as the evidence develops and the preferred approach emerges. It is therefore necessary to look at the alternatives assessments reported at each stage to gain a comprehensive understanding of the progression and assessment of options. These are linked below:
- [Issues and Options SA Report \(2017\)](#).
 - [Interim SA Report \(2021\)](#); and
 - [SA Report \(2024\)](#).
- 3.1.3 To provide a more general understanding, the alternatives assessed to date and how these have informed the latest options being assessed in this report are summarised in this chapter.
- 3.1.4 Alternatives at this stage focus on the spatial strategy (the level and location of development) given that this is the focus of the Local Plan Addendum (more specifically the focus is on strategic development at the Tipner West site that has been a key part of the spatial strategy to deliver new housing and employment).
- 3.1.5 To arrive at outline reasons for the alternatives dealt with, this chapter is structured around answering the following questions:
- How much growth needs to be delivered?
 - Where are the key locations to deliver this growth?
 - What are the growth delivery challenges?
 - What alternatives have been explored to date?
 - What alternatives can be identified at this stage?

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3.2 How much growth needs to be delivered?

- 3.2.1 Growth needs to consider a variety of needs which are explored in turn below.

Housing needs

- 3.2.2 In line with the National Planning Policy Framework (NPPF), Local Planning Authorities should aim to meet their identified housing need, as established by using the Government's standard method for calculation. The housing requirement set by the Local Plan demonstrates the extent to which identified needs can be met over the plan period.
- 3.2.3 A Housing and Economic Development Needs Assessment (HEDNA) undertaken in 2023 informed the previous iterations of the Local Plan and SA in terms of its housing and economic development targets. The HEDNA has been revisited and revised in 2025, to account for an update to the NPPF standard method and proposed changes to the Plan period (now running from 2025 to 2040 instead of 2020 to 2040 previously). The HEDNA Update (2025) states that the standard method sets a local housing need figure of **1,019 dwellings per annum** for the City, which equates to **15,285 dwellings over the plan period 2025-2040**.

Affordable housing needs

- 3.2.4 The link between affordable housing need and overall need (of all tenures) is complex and in trying to make a link it is important to recognise that many people identified with affordable housing needs are already in housing (and therefore do not generate a net additional need for a home).
- 3.2.5 The HEDNA (2023) investigated affordable housing needs split between a need for social/ affordable rented accommodation (based on households unable to buy or rent in the market) and the need for affordable home ownership (including those who can afford to rent privately but cannot afford to buy a home). When looking at needs from households for social/affordable rented accommodation in Portsmouth, the evidence from the HEDNA (2023) suggested a need for 851 affordable homes per annum across the city. This figure was subsequently updated and reduced slightly to 763 homes per annum in the HEDNA Update (2025). This does not require the Council to increase the Local Plan housing requirement due to affordable needs but does suggest that the City Council should maximise the delivery of affordable housing at every opportunity. The new NPPF published in 2024 has introduced a requirement in paragraph 64 for Councils to consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements.
- 3.2.6 When looking at affordable rented accommodation, analysis suggests a need for both social and affordable rented housing. However, with social rents being more affordable (benefiting a wider range of households), the HEDNA (2023) recommended that social rents be prioritised where delivery does not prejudice the overall delivery of affordable homes.

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When looking at affordable home ownership the analysis is less conclusive about the scale of the need but does recognise that it is lower than social and affordable renting needs. In terms of the type of affordable home ownership, the HEDNA (2023) recommended the prioritisation of shared ownership schemes over First Homes (for which there is little evidence of genuine need). The new NPPF published in 2024 also removed the requirement for First Homes.

Specialist housing needs

- 3.2.7 With regards to other housing needs, there is a notable student population attending the University of Portsmouth that has distinct housing needs. The city has seen significant private sector development of PBSA (Purpose Built Student Accommodation) in recent years, but the HEDNA (2023), identifies that in the 2022/23 academic year some 42% of students reside in HMOs (Houses of Multiple Occupation), higher than the national average of 27%. Moreover, the HEDNA (2023) identifies that this supply is rapidly falling and affordability worsening. With the University continuing with planned growth (of a minimum of 10% over the next three to four years) in the context of local affordability issues, the HEDNA (2023) recommends that the Council support further PBSA development with affordable housing elements.
- 3.2.8 Additionally, in the context of an ageing population there is a continued need to support specialist C2 accommodation. The HEDNA Update (2025) forecasts a 24.4% increase in the population aged 65+ between 2025 and 2040, alongside a 35.5% increase in the number of people with dementia and a 31% increase in those with mobility problems. The HEDNA Update (2025) indicates a need for 617 additional housing units with care split between market and affordable housing and a need for additional residential and nursing care bedspaces.
- 3.2.9 ORS completed an updated Gypsy and Traveller Accommodation Assessment (GTAA) in 2023 which has identified no additional pitch needs within Portsmouth in the period up to 2040. Despite this, it does recognise the need to continue a criteria-based policy approach to gypsy and traveller development needs in order to address any need associated with windfall applications, in-migration, or from households currently living in bricks and mortar.

Employment land needs

- 3.2.10 Key employment activities in Portsmouth today are recognised in the defence and aerospace, advanced manufacturing and engineering, digital and creative industries, marine and maritime industries, and health and tourism sectors. Portsmouth is an important centre for work within the sub-region and is home to a large proportion of the UK's naval fleet and an internationally recognised port and university. One of the key challenges for the Local Plan is to provide a balance between the provision of accessible employment land to support growth whilst meeting the housing needs of a growing population, within its constrained island geography.
- 3.2.11 Key existing employment sites in Portsmouth include the Portsmouth International Port, HM Naval Base, and waterfront access sites (Trafalgar Wharf, Port Solent, and The Camber). Lakeside North Harbour Business

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Park in Cosham also offers high-quality office and research and development (R&D) space, and there are well-occupied industrial estates in Hilsea supporting a range of sectors.

- 3.2.12 Existing strategies also influence the Local Plan in terms of economic growth. The Economic Development and Regeneration Strategy (2019-36)⁵ seeks to deliver 7,000 more jobs in the period up to 2036 and improve educational attainment for Portsmouth's residents. Furthermore, the Solent Growth & Prosperity Strategy (2025)⁶ considers the priorities and approaches needed to facilitate a step change in sustainable economic growth across the Solent.
- 3.2.13 In addition, Portsmouth City Council also need to consider a request from neighbouring Havant Borough Council (2025) for help to meet their unmet employment need of 51,424m² of office space.
- 3.2.14 Key evidence that has been developed to support the Local Plan in determining the approach to employment land allocations is the HEDNA (2023) and HEDNA Update (2025). The HEDNA Update (2025) provides a clear steer for the Local Plan in terms of the amount of industrial land to plan for, and the amount of office space to plan for, to meet local needs.
- 3.2.15 With regards to manufacturing and warehousing, and R&D/industrial land, a significant element of the growth strategy to date had been the creation of a new marine hub at the Tipner West and Horsea Island East development site. However, this is no longer being carried forward, due to the need to avoid adverse effects (that cannot be mitigated) upon the SPA/Ramsar designated sites. The need for **81,605m² of additional industrial land in the period up to 2040** (as established by the HEDNA Update 2025) is therefore being revisited in the Local Plan Addendum. Around half of this need is expected to be met by extant permissions which are likely to be delivered within the first five years of the plan period.
- 3.2.16 With regards to office space, the HEDNA recognises a recent reduction in office occupancy and a 'flight to quality' phenomenon following the pandemic. It therefore seeks to factor in reduced levels of employment growth and replacement demand for office development. High-quality locations such as Lakeside North Harbour represent the type of office development that is favourable to investors when planning for the identified need for around **25,880m² of additional office space in the period up to 2040**. A small proportion of this need (4,402m²) is expected to be met by extant permissions and delivered within the first five years of the plan period.

⁵ [Portsmouths economic development and regeneration strategy 2019-2026](#)

⁶ [SGPS-Jan-2025.pdf](#)

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3.3 Where are the key locations to deliver this growth?

Identifying growth locations

- 3.3.1 The Housing and Economic Land Availability Assessment (HELAA) details the Council's assessment of potential housing and employment sites deemed either developable or deliverable across the city and is the main evidence-based study on land supply. The latest HELAA evidence (2025) demonstrates a **forecasted total housing supply of 11,369 new homes over the plan period**, which is an annualised figure of around 758 new homes a year (inclusive of a windfall allowance). It demonstrates that **Portsmouth cannot identify sufficient land to meet its housing needs** (of 1,019 dwellings per annum) as calculated by the Standard Method.
- 3.3.2 All HELAA sites have been subject to a high-level SA GIS analysis, against broad indicators identified under the each of the SA topics. This analysis was originally undertaken to inform Appendix B of the [Interim SA Report \(2021\)](#) and was updated in 2024 and presented in Appendix C of the [SA Report \(2024\)](#). This analysis continues to inform the SA.
- 3.3.3 All growth locations explored in the Interim SA Report (2021) that were identified as having little to no potential for growth continue to be discounted at this stage (see the [Interim SA Report](#) (2021) for detailed reasoning). In summary this includes:
- **Important open, nature, and recreational spaces** at Southsea Common, Milton Common, Farlington Marshes, Hilsea Lines, Portsdown Hill, and Great Salterns Recreation Ground and Golf Course and Baffins Pond. These will be retained as important ecological and recreational sites.
 - **Portsmouth Naval Base, Whale Island (secure naval facility), and Portsmouth International Port.** These sites are in active use, and whilst it is expected that the port will continue to grow to bolster its commercial viability the site is not appropriate for allocation in the Local Plan.
 - **HMS Excellent, Horsea Island.** This former landfill site is Ministry of Defence land in part, and a large area is being developed as strategic open space containing key ecological assets (including feeding areas for Brent Geese and a nationally designated Site of Special Scientific Interest). Most of this area is not considered suitable for development, though parts in the east were considered throughout plan development as part of the Tipner West and Horsea Island East marine hub development proposal. The marine hub development proposal has now been withdrawn (as reflected in the Local Plan Addendum) in line with the Council's desire to avoid adverse effects (that cannot be mitigated) on internationally designated biodiversity sites.

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- 3.3.4 In addition to above, Cosham has been previously explored as a strategic development area, however, as Local Plan work has progressed, no deliverable opportunities in Cosham could be identified. Whilst opportunities for estate regeneration will continue to be explored by the Council, significant development sites cannot be identified at this stage (smaller deliverable and developable sites identified in the HELAA will continue to contribute to future growth).
- 3.3.5 All sites assessed as suitable, achievable, and available in the HELAA are either allocated or identified in the Local Plan for housing, employment or mixed-use development as either **Strategic Sites, Site Allocations, or, Deliverable Sites or Developable Sites**.

Strategic Sites and Site Allocations

- 3.3.6 Strategic Sites consist of the following:
- Tipner West (1,000 new dwellings and 25,000m² manufacturing and warehousing floorspace) – this is a revised site in the Local Plan Addendum
 - Tipner East (1,056 new dwellings)
 - Lakeside North Harbour (50,000m² new office space)
 - Portsmouth City Centre (3,458 new dwellings (lowest estimate) and 5,846m² new office space) – the City Centre supply has been updated in the Local Plan Addendum
 - Fratton Park & The Pompey Centre (460 new dwellings) – the supply of homes at this site has been updated in the Local Plan Addendum
 - St James' and Langstone Campus (405 net additional dwellings)
 - Horsea Island Strategic Open Space (64 ha strategic public open space) – this policy has been updated in the Local Plan Addendum
- 3.3.7 Site Allocations consist of the following:
- Land West of Portsdown Technology Park (12,500m² R&D/ manufacturing and warehousing) - this policy has been updated in the Local Plan Addendum
 - Port Solent (500 new dwellings) - this policy has been updated in the Local Plan Addendum
 - St John's College (212 new dwellings)
 - Fraser Range (134 new dwellings)
 - The News Centre, Hilsea (100 new dwellings)
 - Somers Orchard, Somerstown (566 new dwellings)
- 3.3.8 Lakeside North Harbour and Portsmouth City Centre are the strategic delivery sites for new office space and development is expected to both meet the needs of Portsmouth and contribute towards the unmet needs of Havant Borough Council. These locations are considered prime locations to deliver high-quality office space and meet the trending demands.

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- 3.3.9 The Tipner West site is a revised Strategic Site allocation for the Local Plan Addendum with the removal of the former Tipner West and Horsea Island East marine hub proposal following the Council's decision to avoid adverse effects (that cannot be mitigated) upon protected SPA/Ramsar habitats. Tipner West will be a key delivery site for future manufacturing and warehousing growth, supplemented by growth at Land West of Portsdown Technology Park delivering additional manufacturing and warehousing growth and new R&D and industrial land. These are the only employment land allocations for these sectors and **fall slightly short (around 3,107m² short) of meeting the estimated industrial and warehousing floorspace needs.**
- 3.3.10 The largest housing allocations will be focused within the City Centre and at Tipner (West and East), supplemented by key larger growth sites Fratton Park & The Pompey Centre, St James' and Langstone Campus, Port Solent, and Somers Orchard. Combined, the **Strategic Sites and Site Allocations are estimated to supply at least 7,891 new homes.**

Deliverable and Developable Sites

- 3.3.11 Deliverable and Developable (HELAA) Sites are generally smaller identified sites and include sites with extant planning permissions as of 31 March 2025 (which are expected to be delivered within the early plan period). Whilst extant planning permissions equate to some 833 new homes a 15% non-implementation rate has been applied to provide a more realistic estimated supply of **708 new homes (permitted).**
- 3.3.12 The remaining Deliverable and Developable (HELAA) Sites (Appendix 2 of the Local Plan Addendum) are expected to contribute a further **1,585 new homes** after applying a 15% non-implementation rate.

Completions and Windfall Allowance

- 3.3.13 With the plan period now beginning in 2025, there are no net completions since 1 April 2025 that can be counted as contributing towards meeting the housing need.
- 3.3.14 In terms of a windfall allowance (accounting for small scale in-fill type developments of less than 5 dwellings) the Council has forecasted an additional **79 dwellings per annum** could contribute towards meeting the housing needs (equating to an estimated total of **1,185 dwellings over the whole plan period**).

Supply and demand summary

- 3.3.15 The land supply (HELAA sites) and estimated needs are brought together in Tables 3.1 and 3.2.

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Table 3.1: Housing needs and land supply

Source		Number of homes (net)
Need (2025-2040)		15,285
Net completions (since 1 April 2025)		0
Strategic Sites	Tipner West	1,000
	Tipner East	1,056
	Portsmouth City Centre	3,458 (lowest estimate)
	Fratton Park & The Pompey Centre	460
	St James' and Langstone Campus	405 (417 gross)
Allocation Sites	Port Solent	500
	St John's College	212
	Fraser Range	134
	The News Centre, Hilsea	100
	Somers Orchard, Somerstown	566
Deliverable & Developable Sites	Extant permissions (as of 31 March 2025)	833
	Less 15% non-implementation rate	(-125)
	Deliverable Sites	160
	Less 15% non-implementation rate	(-24)
	Developable Sites	1,705
	Less 15% non-implementation rate	(-256)
Windfall allowance		1,185
Total supply of homes		11,369
Supply vs need difference		-3,916

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Table 3.2: Employment land needs and supply

Source		Office space (m ²)	R&D/ industrial processes (Class E(g)(ii&iii)) (m ²)	Manufacturing/ warehousing (Class B2/B8) (m ²)
Need		25,880	81,605	(combined with R&D/industrial)
Extant permissions (as of 31 March 2025)		4,402	7,868	33,130
Strategic Sites	Portsmouth City Centre	5,846	-	-
	Tipner West	-	-	25,000
	Lakeside North Harbour	50,000	-	-
Allocation Sites	Land West of Portsdown Technology Park	-	6,250	6,250
Total supply		60,248	78,498	(combined with R&D/ industrial)
Supply vs need difference		+34,368	-3,107	(combined with R&D/ industrial)

3.4 What are the growth delivery challenges?

City challenges

- 3.4.1 The updated identified housing need of 1,019 dwellings per annum is an increase of 120 dwellings each year on previous calculations (The HEDNA 2023 identified a need for 899 dwellings per annum). This means a higher number of homes need to be planned for in the Portsmouth Local Plan. The housing need lies in stark contrast to historic housing delivery rates, with average net housing completions significantly lower at 416 dwellings per annum over the last ten years.
- 3.4.2 To meet the full housing need set by the standard method is difficult in the context of Portsmouth which is already a highly built-up city, with many constraining factors such as nature and heritage designations that limit options for housing growth, and challenge development viability. This is reflected in the historic housing delivery rates, increasing affordability issues and lack of viable sites.
- 3.4.3 Recognising the historic under delivery issues the Council have applied an under-delivery discount or 'non-implementation rate' to future development sites to capture more realistic future delivery rates and in turn more realistic supply and likely shortfall figures.
- 3.4.4 Alongside this, PCC decided to abandon the former Tipner West and Horsea Island marine hub development proposal in order to avoid adverse effects

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upon the SPA/Ramsar sites (that cannot be mitigated). This has significantly reduced the potential scale of development proposals for this key strategic delivery site. This has mostly impacted the delivery of new employment land, housing supply is expected to be broadly the same as that proposed previously.

- 3.4.5 At this stage, no alternative sites to deliver additional industrial land have been identified, and the Local Plan proposals fall slightly short of meeting the identified need for 81,605m².

Sub-Regional growth and Duty to Cooperate

- 3.4.6 PCC continues to be an active membership of the Partnership for South Hampshire (PfSH) and the Local Plan policies seek to take account of wider issues and opportunities affecting the PfSH sub region. The Spatial Position Statement (SPS) published in December 2023⁷ recognises housing shortfalls across the PfSH sub region, including at Portsmouth. The work of the partnership seeks to address this, and it is expected that existing shortfalls will diminish over time with emerging additional land allocations exceeding local needs within certain areas and with the ongoing investigation of Broad Areas of Search for Growth as identified in the SPS.
- 3.4.7 As part of Duty to Cooperate, Portsmouth City Council has reached out to neighbouring authorities to request help in meeting its unmet housing needs. Fareham Borough Council has made a commitment in their Local Plan to contribute **800 new homes** towards the unmet housing need in Portsmouth.
- 3.4.8 On the other hand, Portsmouth City Council has demonstrated the potential for an over-supply of office space at the Strategic Site allocations which will contribute to meeting some of the unmet needs of Havant Borough Council.

3.5 What alternatives have been explored to date?

- 3.5.1 The SA has been in development since work on the Local Plan commenced, and an initial Interim SA Report accompanied the Local Plan Issues and Options Document for consultation in 2017. The 2017 Interim SA Report was completed in-house by the Council and explored a range of policy options as well as options for strategic growth (including strategic development sites and opportunity areas). All options were assessed in terms of their performance in relation to the SA objectives and presented to stakeholders for comment.
- 3.5.2 AECOM was commissioned to undertake the SA following the Issues and Options consultation. In the subsequent SA work, informed by the HELAA, it was apparent that PCC could not meet the calculated housing need with the available deliverable and developable sites. The Interim SA Report (2021) therefore sought to test the potential effects of various ways to boost housing supply, including by increasing densities at strategic and non-strategic sites, by releasing open spaces for housing development, by repurposing strategic employment land, and through accelerated estate regeneration schemes. The Interim SA Report further sought to test variable levels of reliance on strategic development sites (notably at Tipner West and Horsea Island East,

⁷ [PfSH Spatial Position Statement 2023 - Partnership for South Hampshire](#)

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Lakeside, and within the City Centre) and on meeting a proportion of housing needs outside the City boundary through Duty to Cooperate negotiations.

- 3.5.3 The Interim SA Report accompanied the draft Local Plan for Regulation 18 consultation in 2021, and feedback informed the continued work on the Local Plan and SA. Consultation did not raise any significant issues in relation to the SA, with the most contentious element of the plan continuing to be the Tipner West and Horsea Island East marine hub development proposal. The subsequent SA Report (2024) – recognising this most contentious element – sought to thoroughly investigate plan options that did not rely on this scheme coming forward. Furthermore, with strategic flood risk assessment work (namely sequential and exception testing) developing at that time, the SA recognised the reliance of the plan on development within Flood Risk Zones 2 or 3. The SA Report (2024) therefore integrated these considerations and tested options ranging from a housing supply entirely within Flood Risk Zone 1 (avoiding development in higher flood risk areas and thus removing the marine hub scheme) to options maximising development in higher flood risk areas. Policy options that relate to housing supply (Houses of Multiple Occupation and First Homes) and development viability (Biodiversity Net Gain) were also tested in the SA Report (2024).
- 3.5.4 The SA Report (2024) accompanied the Pre-Submission Local Plan for Regulation 19 consultation in 2024. Feedback from consultation in relation to the SA was considered and some very minor updates to the SA Report were suggested ahead of submission of the Local Plan and SA – see **Appendix C**. However, in early 2025 the City Council decided to pursue further changes to the Plan, as set out in the Local Plan Addendum. Whilst the additional Regulation 19 consultation on the Pre-Submission Local Plan Addendum 2025 will focus solely on the changes being made to the Plan at this stage, it was decided to update the SA Report entirely ahead of submission, for ease of reference at Examination.

3.6 What alternatives can be identified at this stage?

- 3.6.1 There are no new strategic sites or development opportunities that have been introduced since the last iteration of the Local Plan and SA in 2024. In early 2025, the Council decided to prepare the Pre-Submission Local Plan Addendum to avoid adverse harm on international nature conservation designations that could not be mitigated. This involves pursuing reduced development at Tipner West and Horsea Island East including abandonment of former marine hub proposals. In addition, the plan period has now been updated, and the updated NPPF 2024 has been taken into account.
- 3.6.2 These changes have resulted in a strategy that now falls slightly short of meeting the forecasted industrial land needs as well as housing land needs. There are no alternative sites to deliver additional industrial floorspace (noting all available and suitable sites have been identified in the plan). Whilst there is an oversupply of new office space being delivered at Lakeside North Harbour, and this area could potentially accommodate some R&D type development, B2/B8 uses on this site would not be appropriate. The site is therefore not appropriate for allocation to deliver against unmet industrial floorspace needs. The Local Plan Addendum is clear that the evidence base

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and policy framework highlights the possibility of intensifying the employment offer at some of the existing industrial estates in Portsmouth and thus further growth may occur during the plan period at these sites that would contribute towards the unmet industrial floorspace needs. Additionally, the argument exists that with unmet housing needs in the city, the full employment land needs are not necessarily required to meet the growth that is likely to occur over the plan period. With these factors considered, no alternative options for meeting the industrial floorspace needs have been identified at this stage.

- 3.6.3 While no new strategic options/ opportunities have been identified, the NPPF updates have led to new alternatives being identified in relation to meeting affordable housing needs, and new options have been explored for development at Tipner West.

Affordable housing options

- 3.6.4 The new NPPF introduced a requirement in paragraph 64 for Councils to consider the particular needs of those who require social rented accommodation when undertaking needs assessments and setting policies on affordable housing requirements. Prior to this, the emerging Local Plan had not included a specific Social Rent requirement in the affordable housing policy (Policy PLP17).
- 3.6.5 The Council have therefore identified the following two options for SA:
- **Option 1:** Maintain the proposed policy approach that requires 30% affordable housing in new development, with the amount of social rented housing being determined through the planning process and viability testing.
 - **Option 2:** Revise the policy approach to a requirement for 25% affordable housing with social renting forming 75% of this.
- 3.6.6 These options are being tested as it has been identified that setting a requirement for levels of social rented housing in affordable housing delivery has an adverse effect on viability in Portsmouth, to the extent that the overall delivery of affordable housing would need to be reduced to accommodate the requirement.

Tipner West strategic site options

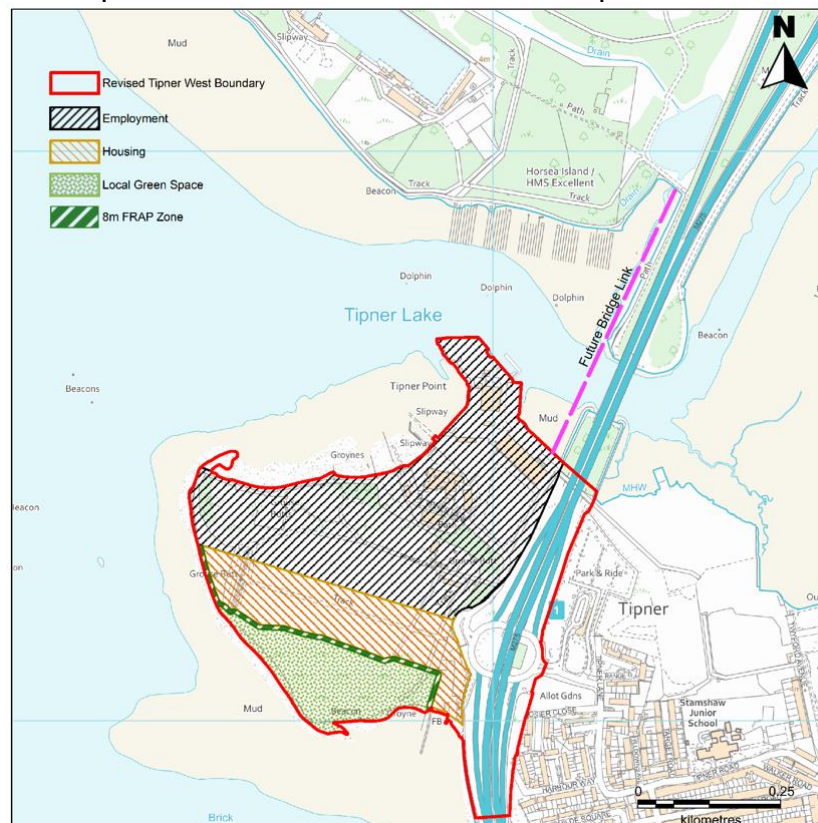
- 3.6.7 The Council have been investigating options for the type of development being promoted at the revised Tipner West site, particularly in terms of the amount of land to be given over for employment and housing development. To support the Council's decision in this matter, options are presented for SA. There are four options for this site (set out below), with the current preferred option of the Council being a hybrid of Options 1 and 3. Whilst a fifth option for an 'all employment' scheme exists, this has been dismissed at this stage as 'unreasonable' for multiple reasons that include development viability, failure to deliver critical infrastructure, and market absorption rates at this scale of development.

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- **Option 1:** A housing-led scheme with a small proportion of land for employment purposes in the north of the revised Tipner West site.



- **Option 2:** An employment-led scheme with a small proportion of housing development in the south of the revised Tipner West site.



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- **Option 3:** A relatively balanced (even) split of housing and employment land across the revised Tipner West site.



- **Option 4:** Housing only development at the revised Tipner West site.



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4. Appraising reasonable alternatives

4.1 Methodology

- 4.1.1 In appraising the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 1.1) as a methodological framework. Effects are stated in text and to assist a summary table is included where green shading is used to indicate significant positive effects, and red shading indicates significant negative effects. Where appropriate, neutral effects or uncertainty will also be noted. Where there is a need to rely on assumptions to reach a conclusion, this is made explicit in the supporting narrative.
- 4.1.2 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference (separate to the summary of likely significant effects). This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the site option or options that are preferred from an SA perspective with '1' being the highest ranking. '=' has been used to highlight where options perform relatively equally and cannot be readily differentiated between (for a particular SA Objective).

4.2 Assessment of affordable housing policy options

- 4.2.1 Chapter 3 has established the following affordable housing policy options to be assessed:
- 4.2.2 The following options are therefore subject to assessment:
- **Option 1:** Maintain the proposed policy approach that requires 30% affordable housing in new development, with the amount of social rented housing being determined through the planning process and viability testing.
 - **Option 2:** Revise the policy approach to a requirement for 25% affordable housing with social renting forming 75% of this.
- 4.2.3 The table below sets out summary findings of the four options that are outlined above. These findings are discussed in further detail overleaf.

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SA objective		Option 1	Option 2
1 (Economy)	Significant effect?	Yes – positive	Yes – positive
	Rank	1	2
2 (Town centres)	Significant effect?	Yes – positive	Yes – positive
	Rank	=1	=1
3 (Sustainable transport)	Significant effect?	No	No
	Rank	2	1
4 (Climate change, flooding, and coastal change)	Significant effect?	No	No
	Rank	2	1
5 (Housing)	Significant effect?	Yes – positive	Yes – positive
	Rank	1	2
6 (Healthy communities)	Significant effect?	Yes – positive	Yes – positive
	Rank	1	2
7 (Historic environment)	Significant effect?	No	No
	Rank	=1	=1
8 (Urban design)	Significant effect?	No	No
	Rank	=1	=1
9 (Natural environment)	Significant effect?	No	No
	Rank	=1	=1
10 (Natural resources)	Significant effect?	No	No
	Rank	=1	=1

SA-1: Building a strong, competitive economy in Portsmouth

- 4.2.4 By delivering more affordable housing, Option 1 would provide a higher level of access to housing for low-income households. Where housing is in accessible locations, this could in turn provide low-income households with improved access to employment opportunities and educational facilities. This could support the local economy by providing more opportunities for these households and potentially a more highly educated workforce in the vicinity of employment hubs. Whilst both options are considered likely to lead to significant positive effects, Option 1 is ranked slightly more favourably than Option 2.

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SA-2: Ensuring the vitality of the city centre and other town centres in Portsmouth

- 4.2.5 By delivering more affordable housing Option 1 would provide a higher level of access to housing for low-income households. This could in turn provide low-income households with improved access to the city centre / town centres. It could be argued that higher levels of market housing could lead to more affluent people spending in the vicinity of city and town centres, but either way it is difficult to predict that footfall would be different under either scenario. On this basis, the Options cannot be meaningfully differentiated between, and both options are likely to support significant positive effects by increasing footfall overall within the city centre and/ or town centres.

SA-3: Promoting sustainable transport in Portsmouth

- 4.2.6 The location of housing, and new infrastructure delivered alongside it, largely dictates the degree to which growth promotes sustainable transport usage. Due to this, neither option is considered likely to have a significant impact on sustainable transport, and therefore no significant effects are anticipated. Despite this, Option 2 could be ranked marginally better than Option 1 as higher levels of market housing delivery in schemes could increase the viability of supporting infrastructure improvements.

SA-4: To tackle climate change, flooding and coastal change in Portsmouth

- 4.2.7 The options are not considered likely to have a direct impact on climate change, as they focus on the delivery of affordable housing. Under both scenarios the location of development is likely to remain the same, and therefore no significant effects are predicted under either option. Option 2 could be ranked marginally better than Option 1 given that higher levels of market housing could increase the viability of supporting infrastructure improvements, including energy efficiency schemes.

SA-5 Delivering high quality homes in Portsmouth

- 4.2.8 By delivering more affordable housing, Option 1 would provide a higher level of access to housing for low-income households. In this respect, this option best addresses existing affordability issues, including deprivation and inequality. In addition, by delivering more affordable housing overall (30% versus 25% under Option 2), Option 1 would enable a greater proportion of first-time buyers to get on the housing ladder. Notably, by setting the requirement for social rented housing under Option 2, this would decrease the viability of affordable housing delivery, thus reducing the overall affordable housing requirement. Whilst both options are considered likely to lead to significant positive effects by supporting affordable housing delivery, Option 1 is ranked more favourably than Option 2.

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SA-6: Promoting healthy communities

- 4.2.9 There are close links between health and deprivation. By delivering more affordable housing, Option 1 would provide a higher level of access to housing for low-income households, including potentially some of the most vulnerable households. Where housing is in accessible locations, this would in turn provide low-income households with improved access to services, facilities, employment opportunities, and educational facilities via foot/ bicycle, potentially supporting reduced levels of deprivation. Accessible development could also increase the uptake of active travel amongst these households, potentially helping to tackle issues such as obesity. Accessible development could also improve access to public open greenspaces and recreational facilities, further contributing to the mental and physical health of low-income households. Notably, such households tend to be disproportionately affected by health issues. Whilst Option 2 is also likely to promote healthy communities, this will not deliver the same level of benefits to low-income families, or to the overall population. As such, whilst significant positive effects are predicted under both options, Option 1 is ranked more favourably than Option 2.

SA-7: Conserving and enhancing the historic townscape

- 4.2.10 It is recognised that housing – especially in/near conservation areas and designated heritage assets – will need to be sympathetically designed so that it enhances, rather than detracts from, the historic environment. It is anticipated that the historic environment-focused and design policies within the plan will largely address heritage considerations, rather than policy requirements relating to affordable homes which is the focus of these options. As such, no significant effects are anticipated under either option, which have been ranked equally.

SA-8: Requiring good urban design in Portsmouth

- 4.2.11 It is recognised that housing will need to be well designed, and it is considered that the wider design-focused policies within the plan will seek to ensure this happens. However, the options are not considered likely to have a direct impact on urban design, as they focus on the delivery of affordable housing within any given scheme, and therefore no significant effects are anticipated under either option and the options are ranked equally.

SA-9: Conserving and enhancing the natural environment

- 4.2.12 It is recognised that housing will likely have some impact on the natural environment, both directly through the construction/ operation of housing and indirectly as a result of increased recreational disturbance. However, the options are not considered likely to have a direct impact on the natural environment, as they focus on the delivery of affordable housing within any given scheme, and therefore no significant effects are anticipated under either option and the options are ranked equally.

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SA-10: Facilitating the sustainable use of natural resources in Portsmouth

- 4.2.13 It is recognised that the delivery of new homes and associated infrastructure will ultimately utilise natural resources both during construction and operation. However, the options are not considered likely to have a direct impact on natural resources, as they focus on the delivery of affordable housing within any given scheme, and therefore no significant effects are anticipated under either option and the options are ranked equally.

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4.3 Assessment of Tipner West strategic site options

4.3.1 Chapter 3 has established the following further options to be assessed at the revised Tipner West site allocation:

- **Option 1:** A housing-led scheme with a small proportion of land for employment purposes in the north of the revised Tipner West site.
- **Option 2:** An employment-led scheme with a small proportion of housing development in the south of the revised Tipner West site.
- **Option 3:** A relatively balanced (even) split of housing and employment land across the revised Tipner West site.
- **Option 4:** Housing only development at the revised Tipner West site.

4.3.2 The table below sets out summary findings of the four options that are outlined above. These findings are discussed in further detail overleaf.

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SA objective		Option 1	Option 2	Option 3	Option 4
1 (Economy)	Significant effect?	Yes - positive	No	Yes - positive	Yes - negative
	Rank	2	3	1	4
2 (Town centres)	Significant effect?	Yes – positive	No	Yes – positive	Yes – positive
	Rank	2	4	3	1
3 (Sustainable transport)	Significant effect?	Yes - positive	No	Yes - positive	Yes - positive
	Rank	=1	4	3	=1
4 (Climate change, flooding, and coastal change)	Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive
	Rank	3	1	2	4
5 (Housing)	Significant effect?	Yes - positive	No	Yes - positive	Yes - positive
	Rank	2	4	3	1
6 (Healthy communities)	Significant effect?	Yes - positive	Yes - positive	Yes - positive	Yes - positive
	Rank	1	4	2	3
7 (Historic environment)	Significant effect?	No	No	No	No
	Rank	2	4	1	3
8 (Urban design)	Significant effect?	Yes - positive	No	Yes - positive	No
	Rank	2	4	1	3
9 (Natural environment)	Significant effect?	No	No	No	No
	Rank	3	2	1	4
10 (Natural resources)	Significant effect?	No	No	No	No
	Rank	2	2	1	3

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SA-1: Building a strong, competitive economy in Portsmouth

- 4.3.3 The Tipner West site is identified as a strategic focus for development within the City Deal, with aspirations to expand the marine and maritime sector given its location and waterside setting. While opportunities are more limited compared to the previously proposed marine hub, Options 1–3 in particular would contribute towards these ambitions through the delivery of employment land, helping to diversify the local economy and strengthen Portsmouth's economic position.
- 4.3.4 Portsmouth has an identified over-supply of office space but a small under-supply of industrial floorspace. Tipner West represents one of the few sites in the city capable of accommodating industrial floorspace development and in this context, employment land delivery at Tipner West will make an important contribution to meeting employment land needs, in addition to supporting wider regeneration objectives.
- 4.3.5 Option 1 proposes the smallest amount of new employment floorspace, with increasing provisions under Options 3 then 2. Whilst Option 2 would deliver the most employment floorspace, the advice provided by Iceni whilst preparing the HEDNA was that such a large quantum of general employment floorspace could flood the market and lead to moderate negative effects. Option 3, followed by Option 1 are therefore considered most likely to support sustainable economic growth, and are ranked most favourably accordingly. By combining new housing development alongside, these options are considered more likely to deliver new accessible employment opportunities and support significant positive effects.
- 4.3.6 Option 4 would involve a wholly residential-led approach at the revised Tipner West site, with the site developed entirely for housing (with no dedicated employment area provided). The absence of employment development means that direct job creation on the site would be minimal when compared to other options. No industrial land development at this site would be a missed economic opportunity for Portsmouth and would likely result in more significant under-supply issues for this type of development. Potentially significant negative effects could therefore be predicted.

Conclusions

- 4.3.7 Given the above, Option 4 is ranked least favourably with the noted potential for negative effects of significance. This is followed by Option 2 given the moderate negative effects associated with flooding the market with a larger quantum of employment floorspace. Option 3 is ranked most favourably recognising the even split of housing and employment development that would support accessible new job opportunities and which contributes more new employment land than Option 1.

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SA-2: Ensuring the vitality of the city centre and other town centres in Portsmouth

- 4.3.8 All options proposed seek to provide some level of new housing, which would help to increase footfall in nearby town centres and support local services. Options that prioritise housing delivery (Options 1 and 4) are considered more favourable in this respect, as the larger residential population would generate stronger demand for retail, leisure, and community services both within nearby centres and in the wider city region. This could help to enhance the resilience of town centres over the longer term by boosting footfall and encouraging further investment. Option 4, as an entirely housing-led approach, has the greatest potential to contribute in this way, although the absence of employment space means that direct day-to-day business activity on site would be limited.
- 4.3.9 Option 3 includes a balanced provision of both homes and jobs, which could help to create a more integrated community with an increased demand for services and subsequent increase in spending. However, Option 2 is less likely to support town centre vitality to the same extent as Option 3, as the resident population delivered would be more limited, and spending from this is likely to be equally lower. While an increased number of jobs could generate some indirect benefits for centres, the effects may be weaker and more uncertain compared to those options delivering larger numbers of homes (Options 1 and 4). Further, Option 2 has the potential to negatively impact town centres, as an employment only approach could drive employment competition with town centres and could lead to people travelling away from town centres, therefore decreasing footfall.

Conclusions

- 4.3.10 Overall, it is considered that Options 1, 3, and 4 are likely to have **significant positive effects** on town centres, with increased footfall having the potential to improve vitality and resilience of nearby town centres. These are ranked according to level of housing provision, with Option 4 being the most favourable. Option 2 is considered to have the potential for minor negative impacts, with some uncertainty of the impact of employment only on town centre footfall.

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SA-3: Promoting sustainable transport in Portsmouth

- 4.3.11 Given the size and location of the site, all options proposed are considered likely to support sustainable transport opportunities. Notably the site is well-connected by road, cycle routes, and within walking distance of the Tipner Park and Ride facilities. The proposed bridge corridor connection would further enhance opportunities for walking, cycling, and public transport use by linking the site more directly with the city centre. Crucially, a mixed-use development with a higher number of homes is most likely to be of a scale capable of delivering the new infrastructure required to meet residents' needs. The larger the residential population, the greater the justification and viability for significant investment in sustainable transport upgrades, new facilities, and connectivity improvements. In this context, options with a higher residential focus (Options 1 and 4) not only have the potential to generate greater everyday trips to employment, retail, and leisure opportunities, but also to secure the infrastructure necessary to enable those trips to be made by sustainable modes. Such provision would form an integral part of a holistic, strategic masterplanning approach that prioritises walking, cycling, and public transport connectivity within and beyond the site.
- 4.3.12 Option 2, which prioritises employment space, may generate a higher proportion of in-commuting trips, including some reliance on the private car depending on the origins of workers. The site is well-located to encourage bus and cycle access, and the proposed bridge connection could improve sustainable access from Portsmouth Harbour and the wider city. However, the absence of a residential component to this option means there is more limited opportunity for employees to work in close proximity to their home. As a result, reliance on private vehicles to access employment is likely to remain greater under this option compared to more mixed-use scenarios. Option 3, with its more balanced mix of housing and employment, offers the potential to deliver sustainable growth by enabling residents to access jobs on-site. This would reduce the need to travel long distances, particularly by private car, and support a stronger shift towards sustainable modes.

Conclusions

- 4.3.13 Taking the above into consideration, the mixed-use options are considered more favourable (Options 1 and 3), as they are most likely to reduce the need to travel, delivering homes alongside employment which could alleviate commuting and support sustainable connectivity. **Significant positive effects** are therefore anticipated. By accommodating a higher level of housing alongside employment, these options are also more capable of securing infrastructure delivery to further support sustainable, connected neighbourhoods; with the proposed bridge offering a further opportunity to strengthen links with Portsmouth Harbour and the wider city. Option 4 has an increased residential focus, but a limited employment offer and therefore does not perform as well as Options 1 and 3; although **significant positive effects** are anticipated given the level of growth proposed. Option 2, by contrast, is less favourable: while benefitting from its location and the potential for sustainable transport offered by the proposed bridge, the absence of a residential component means employees would have to travel to work and supporting infrastructure delivery would likely be more limited. Option 2 also risks flooding the market with non-specialist marine employment premises. This could see a greater reliance on private car use.

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SA-4: To tackle climate change, flooding and coastal change in Portsmouth

- 4.3.14 The site is low-lying and has a flat coastal location and associated risks of tidal flooding and coastal change, with a significant portion of the site lying within Flood Zones 2 and 3. In line with national policy, there is an assumption that flood defences will be delivered to make the site viable for development under all options. At the same time, redevelopment of Tipner West provides the opportunity to deliver essential sea defences that could protect not only the site itself, but also part of Portsea Island and important designations such as Portsmouth Harbour. All options provide opportunities to contribute positively to climate change objectives by improved flood defences, reduced contamination effects, incorporating low-carbon design, energy efficiency measures, renewable energy generation, and green infrastructure to support adaptation to a changing climate. Significant positive effects are therefore predicted for development under all options/scenarios.
- 4.3.15 Options with housing focus would place a higher quantum of residential development within an area of flood risk, meaning the need for adaptation would be particularly important. However, these options also provide the opportunity to integrate high standards of sustainable design and climate-resilient infrastructure, with housing delivery improving development viability and helping to support wider investment in mitigation measures. Option 1 combines housing with a smaller proportion of employment land, offering a degree of land use diversification, while Option 4 provides housing only, concentrating residential exposure but potentially supporting delivery at scale that supports greater investment in adaptation measures.
- 4.3.16 Options 2 and 3 would involve fewer homes being located within a sensitive setting, thereby reducing overall residential flood risk vulnerability. Option 3 provides a more even mix of uses, which may help to spread exposure and support integrated resilience measures across the site. Option 2 would minimise residential exposure but would instead concentrate a larger quantum of employment floorspace within the flood zone, which would still require robust protection and adaptation. Employment-led development also has the potential to result in higher overall energy demand depending on the type of employment uses accommodated, though opportunities for low-carbon design would remain.

Conclusions

- 4.3.17 In summary, all options face challenges in relation to flooding and coastal change, but all also present opportunities to deliver sea defences, robust flood risk management, and climate adaptation measures with wider benefits beyond the site itself and significant positive effects are predicted as a result. Option 2 is ranked most favourably as employment uses are considered less sensitive than residential uses to flood risk and therefore more compatible with national policy, though it would still require protection measures and could lead to higher energy demand. Option 3 is considered the next most favourable as it would achieve a relatively balanced distribution of housing and employment land, supporting resilience while moderating overall vulnerability of residents. Option 1 is ranked next, as it combines significant

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housing delivery with a level of employment land to diversify uses and support investment in adaptation. Option 4 is considered the least favourable, as a housing-only scheme would result in greater residential exposure within the flood zone and a heavier reliance on defences, contrary to the NPPF preference to avoid placing housing in areas of higher risk.

SA-5 Delivering high quality homes in Portsmouth

- 4.3.18 The site represents one of the most significant opportunities in the city to deliver new housing, helping to meet local needs and contribute to wider growth objectives. All options would contribute to housing supply to varying degrees, although the scale and focus of provision differs. Given the city's constrained land supply and high demand, the allocation of Tipner West has the potential to make an important contribution towards housing delivery, with associated benefits for affordability and tenure.
- 4.3.19 Option 4 provides the greatest overall number of dwellings, maximising housing delivery but limiting the opportunity to diversify land uses. This could deliver significant benefits in meeting housing demand, though in isolation it may reduce opportunities to create a mixed-use neighbourhood that balances homes with local jobs. Further, the greater the proportion of housing, would provide increased opportunity to deliver a wider mix of housing types and tenures, better supporting identified needs and contributing more meaningfully to addressing the city's housing challenges. Option 1 also prioritises housing but incorporates some employment land, which moderates overall housing numbers slightly. This mixed-use approach would make a substantial contribution to housing delivery, while also supporting a degree of land use balance. Option 3 would also provide a mixed-use approach, however with a lower proportion of housing, which is less likely to deliver diverse housing to meet local needs.
- 4.3.20 Option 2 would deliver the least housing overall, as it prioritises employment-led development with only a small proportion of residential land. In the context of a city with a significant housing shortfall and limited land availability, a low-housing option would perform negatively in terms of contributing to local housing needs, including the delivery of affordable and specialist homes.

Conclusions

- 4.3.21 In summary, all four options deliver housing, which is significant given Portsmouth's shortfall of housing and limited land supply, therefore Options 1, 3, and 4 are considered to have **significant positive effects**, with Options 1 and 4 in particular offering the greatest opportunity to deliver affordable and specialist housing and a wider mix of tenures. Option 4 provides the greatest contribution to housing delivery, though at the expense of mixed-use benefits. Option 1 also performs strongly, combining substantial housing numbers with some employment land. Option 3 makes a more moderate but balanced contribution, supporting a mix of uses while still delivering housing to meet local need. Option 2 delivers the least housing and therefore contributes least towards addressing demand, though it retains potential to support a smaller-scale residential community alongside employment uses.

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SA-6: Promoting healthy communities

- 4.3.22 All site options have the potential to play a key role in shaping healthy, inclusive communities. Residential development delivered through the site will contribute towards the local housing need in Portsmouth and therefore have positive effects on communities. Furthermore, the way that land is planned and used can directly influence access to green space, active travel, local services, and employment opportunities, all of which contribute to people's health and wellbeing.
- 4.3.23 Options 1 and 4, as higher residential options, have the strongest potential to deliver new neighbourhoods that could support investment into local infrastructure, which in turn could lead to improved lifestyles through better connectivity and access to greenspace (with benefits for health). It is also acknowledged that larger scale residential development will provide a more diverse mix of housing, including specialist housing. Option 1 offers scope to create a community where residents can access local jobs on site, reducing the need to travel and encouraging more sustainable, active patterns of movement. This is also anticipated under Option 3, however Option 3 delivers a lower level of residential development and higher level of employment. Option 4, as an entirely housing scheme, would maximise opportunities to deliver homes but could place greater reliance on residents travelling elsewhere for employment, day-to-day services and facilities.
- 4.3.24 Option 2, with a stronger employment focus than Options 1 and 4, would contribute no homes, limiting residential development. The opportunity to provide affordable and specialist housing, and to support social inclusion and community cohesion, would also be greatly reduced compared to the more housing-led options. Nevertheless, this option would provide a substantial quantum of employment land, including industrial space, which could create local job opportunities, strengthen economic resilience, and reduce the need for out-commuting. Improved access via the proposed bridge would also help integrate the site with Portsmouth city centre, making jobs more accessible.

Conclusions

- 4.3.25 Options 1, 3, and 4 are considered to have likely **significant positive effects** for healthy communities, though to varying degrees. Option 1 is most favourable, as it combines substantial housing alongside employment land, creating the strongest potential for a sustainable neighbourhood where residents can access jobs, services and facilities locally, reducing the need to travel and supporting active lifestyles. Option 3 also performs strongly in this respect, with a balanced mix of housing and employment that can foster cohesion and reduce the need to travel. Option 4 performs positively but is less favourable, as while it delivers the largest residential population and supports facilities, it provides no on-site employment, increasing reliance on travel for work and services. Option 2 is worst performing of the options, as it maximises employment but delivers very limited housing, offering fewer opportunities to establish an inclusive residential community. However, it still performs positively in terms of providing industrial jobs locally, which could help reduce commuting pressures and support healthy patterns of working.

SA-7: Conserving and enhancing the historic townscape

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- 4.3.26 The Tipner West site contains a number of important heritage assets, most notably the Grade II listed Tipner magazine complex, which includes eighteenth- and nineteenth-century magazines, a shifting house, cooperage, and boundary wall. The site also retains historic naval associations through its former use as a Ministry of Defence firing range. While parts of the site are currently derelict, there are opportunities to retain and enhance the naval heritage, with opportunities for restoration and re-use. Tipner West occupies a prominent location at the top of Portsmouth Harbour, with views across to significant assets such as the Scheduled Portchester Castle and the D-Day slipways at Horsea Island East. Views to and from the Spinnaker Tower and His Majesty's Naval Base are also important. Any large-scale development therefore has the potential to adversely affect the setting and character of these designated assets, though all options also provide opportunities to improve the legibility and interpretation of these wider historic connections.
- 4.3.27 Options 1 and 4, being more housing-led, would result in a larger residential population in close proximity to the listed buildings. This could increase pressure on the historic environment, both in terms of physical impacts and cumulative change to the setting but would also create strong justification and funding potential for restoration and adaptive re-use, alongside opportunities for improved community engagement with heritage. Option 1 offers some balance through inclusion of employment land, while Option 4 focuses wholly on residential use, increasing pressure on the assets. Options 2 and 3 would deliver fewer homes, meaning less direct residential pressure but also a reduced driver for heritage investment. Option 3, with its more balanced mix, provides scope for heritage-led placemaking alongside community and employment uses, whereas Option 2, with an employment focus, may provide viable uses for restored buildings but could limit their contribution to wider community engagement.

Conclusions

- 4.3.28 In summary, all four options are considered likely to result in **significant negative effects** on the historic environment prior to mitigation, due to the scale of new development and its potential to adversely affect the setting and character of designated heritage assets. However, with appropriate mitigation measures, including sensitive design, conservation, restoration, provision for re-use, alongside consultation with Historic England, residual effects are expected to be **broadly neutral**. This includes repair and restoration to ensure they are brought back into viable use, whether for employment, community, or commercial purposes.
- 4.3.29 Proposals should be required to demonstrate sensitivity in the design of new development, ensuring that building scale and massing do not detract from the character and setting of the listed buildings.
- 4.3.30 Overall, Option 3 is considered the most favourable given its balance of housing and employment and potential for heritage-led regeneration, followed by Option 1 which combines substantial housing with some flexible re-use opportunities. Option 2 is moderately favourable, as employment use reflects the area's heritage. Option 4 is least favourable as a wholly residential approach would place greatest pressure on the historic environment with fewer opportunities for diversified re-use, and does not represent the area's history.

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SA-8: Requiring good urban design in Portsmouth

- 4.3.31 All four options would bring forward large-scale redevelopment of the Tipner West site, creating the opportunity for a new urban area that would contribute to the regeneration of Portsmouth's waterfront. Each option would deliver significant change in terms of site layout and built form, with varying balances of residential and employment uses. In all cases, there is the potential to have high-quality design outcomes through masterplanning, design codes, and strong integration with the wider city.
- 4.3.32 Options 1 and 3 are mixed-use schemes, and therefore present an opportunity to deliver strategic scale, holistic design and masterplanning that embeds the Governments' ten characteristics for well-designed places.⁸ Option 3, with an even balance of housing and employment, performs best in this respect, offering the strongest potential to deliver well located, high quality and attractive mixed-use spaces. The combination of uses would support activity throughout the day, as well as creating variety in the built form, and also reinforce opportunities for walkable neighbourhoods and high-quality public realm. Option 1, while housing-led, incorporates a smaller proportion of employment land to the north, which would help introduce diversity into the layout.
- 4.3.33 A housing-only scheme (Option 4) could also, through economy of scale, create well-designed and well-built places that benefit new and existing communities. However, focus is likely to be placed on connectivity of spaces and green infrastructure delivery, ensuring an attractive place to live.
- 4.3.34 Option 2, an employment-led scheme, is likely to present greater challenges in terms of urban design. Large-scale employment development could limit permeability and reduce scope for active frontages, making it harder to achieve a high-quality urban environment. The inclusion of a small area of housing in the south would help provide some balance, but the overall character would remain less residential and, given the limited level of provision, could potentially be less attractive as a place to live.

Conclusions

- 4.3.35 In conclusion, all options have the potential to bring about positive urban design outcomes through strong masterplanning and design quality. Options 1, 3 and 4 are considered to have **significant positive effects**, though with varying strengths. Option 3 is the most favourable, as it maximises opportunities for a balanced and vibrant mixed-use place. Option 1 also performs strongly, combining substantial housing with employment to support successful place-making. Option 4, while being housing only, would likely increase focus on the living environment. Option 2 performs the least well, as an employment-led approach would likely contribute least well to the cross-cutting themes for good-design set out in the NPPF.

SA-9: Conserving and enhancing the natural environment

- 4.3.36 All options for Tipner West are highly sensitive in relation to the natural environment due to the site's adjacency to Portsmouth Harbour SPA,

⁸ Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities National Design Guide National Design Guide (2024) [online] available at: [National design guide - GOV.UK](https://www.gov.uk/government/publications/national-design-guide)

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Ramsar site and SSSI. The former firing range forms a recognised primary support area for Brent geese, and the wider site contains a mosaic of priority habitats including woodland, grassland, grazing marsh and intertidal areas. Development in this location therefore has the potential for direct habitat loss and indirect effects on designated sites and functionally linked land. The scale and type of development will also influence pressures from recreational disturbance, pollution risks and habitat fragmentation. Delivery of biodiversity net gain requirements also provides an opportunity to enhance local habitats and strengthen ecological networks if carefully integrated into scheme design.

- 4.3.37 The 2025 update to the HRA⁹ seeks to identify any aspects of the emerging Portsmouth Local Plan that might cause Likely Significant Effects (LSEs) on, or adverse effects on the integrity of, Habitats sites. The HRA now concludes that, with recommendations taken into account, no elements of Portsmouth Local Plan would have an adverse effect on the integrity of any Habitats sites, either alone or in combination with other plans or projects.
- 4.3.38 Options 1, 3 and 4 would introduce larger resident populations, increasing the potential for recreational disturbance to sensitive bird populations in the Harbour and surrounding sites. However, these options also provide greater opportunity for contributions toward mitigation measures, including strategic green infrastructure, recreational management, and enhancements to alternative open space provisions. Options 1 and 3, by combining housing with some employment, diversifies land use across the site but would not materially change environmental pressures relative to a housing-only scheme.
- 4.3.39 Option 2, with its stronger employment focus and much smaller residential population, would generate lower levels of recreational disturbance than the housing-led approaches. However, the type of employment uses proposed could bring other risks, such as increased traffic movements, air and water pollution, and greater energy demand. Employment uses could also include overnight activity, with potential light pollution and noise pollution, all of which could adversely affect sensitive habitats if not carefully managed.

Conclusions

- 4.3.40 In summary, all four options are considered likely to result in minor to moderate negative effects on designated habitats and species prior to mitigation and broadly more **neutral effects** once the recommendations of the HRA and wider mitigation measures are taken into consideration. At this stage, there remains a level of uncertainty around the precise type and level of mitigation that will be secured, including how measures for habitat protection, recreational management and pollution control will be implemented. The precise measures are a matter to be resolved at the project stage of the development. However, it is expected that mitigation will broadly be delivered in line with the updated HRA produced for the Local Plan Addendum, meaning that residual effects are anticipated to be **neutral** once appropriate measures are in place.
- 4.3.41 In comparative terms, Option 3 is most favourable as it allows for more integrated mitigation; Option 2 also performs relatively well by reducing

⁹ AECOM (2025) Habitat Regulations Assessment of the Portsmouth Local Plan, Update for Local Plan Addendum

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recreational disturbance, though it introduces risks linked to employment activity; Option 1 performs less well due to its higher housing numbers; and Option 4 is least favourable, as a wholly residential scheme would generate the greatest potential for disturbance pressures before mitigation.

SA-10: Facilitating the sustainable use of natural resources in Portsmouth

- 4.3.42 All options at Tipner West involve redevelopment of a partly derelict brownfield site, which is heavily constrained by historic contamination and its low-lying coastal setting. Development in all cases would therefore necessitate significant remediation and land raising, which is expected to deliver notable benefits in terms of land quality and environmental safety. Remediation and capping of contaminated land would prevent leachate from entering Portsmouth Harbour and improve water quality in the longer term, representing an important positive effect common to all options. Construction of sea defences and delivery of appropriate drainage and nutrient management measures will also be critical across all scenarios to safeguard water resources and support environmental objectives.
- 4.3.43 Options with higher levels of housing (Options 1 and 4) would result in greater demand for potable water and higher volumes of household waste. Option 1 includes a modest proportion of employment land, diversifying activity across the site but not substantially altering pressures relative to a housing-only scheme. Option 4, being wholly residential, would concentrate resource demands, though it also provides scope to design water efficiency measures and waste management infrastructure at scale.
- 4.3.44 Option 2, as an employment-led scheme, would reduce pressures from residential water use but could result in higher energy and material consumption, depending on the type of employment uses delivered. Waste generation associated with construction and servicing of large-scale employment uses could also present challenges. Option 3, with a more balanced mix of housing and employment, would spread pressures more evenly across sectors and provide opportunities to integrate sustainable water, waste and remediation measures through a coordinated masterplan.

Conclusions

In summary, all options have positive effects through the reuse of land and contamination remediation, contributing to the sustainable use of natural resources. However, some negative effects are anticipated during construction and from the use of resources for new development. These can be mitigated, and overall the residual effects are expected to be neutral. Option 3 is considered most favourable, as the balanced profile of housing and employment provides opportunities to manage and integrate resource demands effectively. Option 1 also performs well, though with higher residential pressures on resources such as water. Option 4 is less favourable as a housing-only scheme, concentrating demand on water supply and waste generation. Option 2 is considered least favourable, as employment-led development could generate substantial operational resource demands depending on the form of employment delivered. Overall, none of the options are considered to have significant effects.

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5. Developing the preferred approach

5.1 Overview

- 5.1.1 This section explains the Council's preferred approach, considering the appraisal of reasonable alternatives in Section 4, and bringing it together with available evidence and Council and wider priorities.

5.2 Affordable Housing options

- 5.2.1 The publication of the new NPPF in 2024 introduced a new requirement in paragraph 64 to specify the type of affordable housing required including the minimum proportion of Social Rented homes required. Prior to this, the Council had not included such a specific requirement in the affordable housing policy (PLP17).
- 5.2.2 The Council's preferred approach is not to change the approach taken in PLP17 in the Portsmouth Pre-Submission Local Plan 2024, that is not to specify a specific amount of social rented homes required within the policy. Policy PLP17 already sets an ambitious overall target for affordable housing of 30% despite challenging viability conditions in the City. To add in a specific requirement for a certain amount of this to be social rent would have a negative impact on viability such that the overall percentage of affordable housing provision would need to be lowered. The Council prefers to keep the overall provision of affordable housing higher, rather than lowering it to secure more social rented accommodation. Social rent is still a tenure the Council will seek to secure, but the level of this will be determined on a site-by-site basis and will depend on the nature and viability of the scheme in question.

5.3 Tipner West strategic site options

- 5.3.1 The Council has considered it necessary to remove all aspects of the allocation that are likely to give rise to adverse impacts on international conservation designations that cannot be mitigated. This has meant removing all previously proposed direct losses to the protected SPA/ Ramsar sites, which had affected approximately 0.5ha of reclamation for a workable marine hub quayside, 2.1ha of intertidal habitat for dredging needed to deliver deep water access to the site, 0.3ha of inter-tidal habitat for bridge piers and 3.6ha of terrestrial habitat for anticipated enabling housing development. The amended policy would therefore need to:
- Avoid any reclamation;
 - Abandon dredging and, hence, the prospect of deep water access for a marine hub;
 - Exclude any development of the terrestrial SPA/Ramsar (ie. on land south of the firing range);
 - Remove the development requirement for a bridge, but continue to safeguard land for the landfall of a bridge.

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- 5.3.2 The Council has needed to ascertain the implications of the above changes for delivery of the site allocation, its viability and ability, inter alia, to meet the expectations of the City Deal, for which the proposed deep-water marine hub remained a fundamental component. In addition, the implications of removing the bridge delivery component from the policy (for example, upon development of Horsea Island East) and the loss of land south of the firing range from development assumptions needed to be evaluated. As such, the LPA, in consultation with the PCC Tipner West Site Promoter team, members of the Tipner West Regulatory Panel including the RSPB and the Hampshire & Isle of Wight Wildlife Trust (guest members), statutory and non-statutory consultees and third party expert consultants, engaged in a series of optioneering and evaluation workshops during April and May 2025.
- 5.3.3 The parameters and assumptions for this optioneering exercise were provisionally agreed in advance with the Chief Planner alongside senior management of Property and Investment and Finance and Resources, including consultation with the Leader of the Council and the Portfolio Holder for Planning Policy and City Development. Three high level options formed a broad basis for assessment, being variants of a mix of residential and employment land uses:
- Option 1: Maximising residential
 - Option 2: Maximising employment
 - Option 3: Approximate 50:50 split of residential/employment uses.
- A fourth option that was housing only, was disregarded early on as it would not have delivered any new jobs.
- 5.3.4 These three options were selected cognisant of the City Deal grant provided to Southampton and Portsmouth City Councils in 2014 to unlock sites for redevelopment, in particular to support the growth in the marine and maritime sectors. However, the optioneering process would need to ascertain, inter alia, the implications for the delivery of a regionally-significant marine hub by reason of proposed policy exclusion of deep water dredging and reclamation from the Harbour. The meetings considered in more detail potential land uses, marine hub feasibility, bridge delivery options, sea defences, relocation strategies for existing site leaseholders (including the Harbour School) and the respective financial viability of each option. The sub-group drew in a range of key technical expertise both from within PCC and external consultants and stakeholders familiar with the site and its extensive history of evaluation for re-development.
- 5.3.5 The conclusions of this process were that Option 1 delivered the lowest relative financial deficit of each of the options, alongside other beneficial considerations such as optimal place-making, market absorption of new employment floorspace, use of heritage assets and enabling development cross subsidy. It was clear that without deep water dredging, it would no longer be possible to pursue a viable 'marine hub' of regional significance as immediate deep water access was fundamental to this. Yet with a deficit figure of approximately £107m it was clear that significant external funding would still be required and the sub-group recommended that, in order to reduce this deficit a 4th wholly residential-led Option be explored. This was not taken forward as it would not deliver any employment. This was contrary

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to the parameters set down at the beginning of the optioneering process and in particular with regard to the funding aspirations underpinning the City Deal grant and the potential of an employment site to nevertheless attract marine and maritime, general employment and/or port-related or defence businesses seeking waterside bases with excellent motorway access.

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Part 2: What are the SA findings at this current stage?

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6. Introduction to Part 2

6.1 Overview

- 6.1.1 The aim of this chapter is to present an appraisal of the Local Plan (formed of the Pre-Submission Local Plan 2024 and the Local Plan Addendum 2025), as to be published under Regulation 19 of the Planning Regulations.
- 6.1.2 The appraisal of the Plan is presented under the ten SA objectives established through scoping (see **Table 3.1**). For each objective the spatial strategy is explored followed by the city-wide policies. Cumulative effects are also explored before a conclusion is reached. Strategic sites and site allocation policies do not repeat city-wide policies so all sections should be read in conjunction.

6.2 Methodology

- 6.2.1 The appraisal identifies and evaluates 'likely significant effects' of the plan on the baseline, drawing on the ten SA objectives identified through scoping (see

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6.2.2 **Table 1.1)** as a methodological framework.

6.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the high-level nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Local Plan in more general terms.

6.2.4 Finally, it is important to note that effects are predicted taking account of the effect characteristics and 'significance criteria' presented within Schedules 1 and 2 of the SEA Regulations.¹⁰ So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects.

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

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6.4 Adding structure to the appraisal

- 6.4.1 Whilst the aim is essentially to present an appraisal of 'the plan' under each of the SA objectives,¹¹ it is appropriate to also give stand-alone consideration to elements of the Plan. As such, within the appraisal narratives below, sub-headings are used to ensure that stand-alone consideration is given to distinct elements of the Plan. Within these narratives, specific policies are referred to only as necessary (i.e., it is not the case that systematic consideration is given to the merits of every plan policy in terms of every sustainability objective).

¹¹ Regulations require simply an appraisal of 'the plan'.

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7. Appraisal of the Local Plan

7.1 SA-1: Building a strong, competitive economy in Portsmouth

Commentary on the spatial strategy

- 7.1.1 Economic forecasting, taking account of the city's growth aspirations, sectoral strengths and past employment land take up, has informed the economic growth strategy for the Plan. **Policy PLP25** (Employment Target) outlines that the Council will make overall provision for at least 138,746m² of new employment floorspace during the plan period (2025-2040). This will include 60,248m² of office floorspace (class E); 14,118m² of research and development / industrial processes floorspace (class E); and 64,380m² of manufacturing / warehousing floorspace (class B2 / B8).
- 7.1.2 Employment and/or commercial floorspace will be provided across five of the seven strategic sites and at one site allocation as follows:
- **Tipner West** will deliver approximately 25,000m² of employment floorspace including marine uses (classes E(g)(ii) and (iii) research and development and light industrial, B2 general industrial and B8 storage or distribution) and ancillary office space; a mixed use scheme including a range of industrial, research and development, storage and distribution businesses, with a particular focus upon advanced manufacturing (including marine or clean energy). Due to the protected habitat designations in Portsmouth Harbour and recent Opinions from the Secretary of State¹², it is not possible to achieve deep water access at Tipner West necessary to support a new regionally significant marine hub as originally anticipated. Nonetheless, the delivery of employment floorspace will provide new jobs some of which could be in the marine and maritime sectors, although not the substantive quantum anticipated in the City Deal.
 - **Tipner East** will deliver 716m² of commercial floorspace (classes E, F1 and F2), alongside 840m² ancillary commercial uses at a new transport hub. The development is expected to improve sustainable transport connections with the centre, to better unlock both this site and Tipner West.
 - **Lakeside North Harbour** will deliver 50,000m² of new office floorspace (class E). Most of this will be delivered through intensification of the site with the redevelopment of a proportion of the extensive surface level car parking on the site. Policy PLP5 (Lakeside North Harbour) states that if a robust marketing campaign of at least twelve months, its scope having been agreed in advance by the local planning authority, clearly demonstrates that there is insufficient market demand for new offices at this location, development proposals for other commercial uses that complement the existing office park will be allowed. This will allow

¹² Habitats Regulations Reg. 107(3) Secretary of State Opinion on whether a Plan or Project benefits from Imperative Reasons of Overriding Public Interest (IROPI) - see <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan/>

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flexibility in economic uses over the plan period, recognising that office working patterns continue to change in the wake of the pandemic.

- **Portsmouth City Centre** will deliver 21,600m² (gross – 1,546m² net) of office floorspace. Policy PLP6 (Portsmouth City Centre) outlines that development proposals will be permitted provided that they enhance or complement the range of commercial uses in the City Centre. It also states that proposals falling within the Commercial Road Area should include town centre uses at ground floor level.
- **Fratton Park & the Pompey Centre** will deliver an expansion to the football stadium to increase the capacity from 21,000 to 26,000-30,000. It will also include a supporting hotel (approximately 145 rooms) and mixed conference and event facilities.
- **Land West of Portsdown Technology Park** is also allocated for 12,500m² of research and development, manufacturing and/or storage or distribution floorspace (as a site allocation).

- 7.1.3 Provisions are therefore targeted in the most accessible areas of the city or at strategic locations that support key economic growth sectors. Additionally, the St James' and Langstone Campus site (Strategic Site policy PLP8) is allocated to deliver new educational facilities that support improvements to the educational and skills development offer in Portsmouth.

Commentary on city-wide policy provisions

- 7.1.4 Alongside the new allocations discussed above, existing employment land is safeguarded through **Policy PLP26** (Safeguarding Employment Land). The policy encourages proposals for the redevelopment of existing employment premises that provide improved employment accommodation, make more efficient use of land, and provides a similar number of jobs. Development proposals for the change of use of land / premises from employment purposes to non-employment purposes will only be permitted where the land / premises is not fit for purpose for employment. In such cases, the policy prioritises other commercial uses.
- 7.1.5 Additionally, **Policy PLP27** (Employability & Skills) seeks to support a strong local workforce. The policy supports development proposals which, at both the construction and occupation stages of the scheme, a) raise local skill levels and increase employability; b) tackle skill shortages in existing and potential business sectors; c) address barriers to employment for economically inactive people; and d) provide or contribute to childcare facilities within or near employment sites.
- 7.1.6 **Policy PLP28** also supports the growth and development of identified centres in Portsmouth's Town Centre Hierarchy which will continue to contribute to a thriving economy and continued economic investment in these areas.
- 7.1.7 **Policy PLP30** (Cultural and Visitor Economy) supports development proposals that maximise the potential of the cultural and visitor economy and drive forward culture led regeneration. Such opportunities are sought to be maximised in the centres identified in the town centre hierarchy, particularly the Cultural Quarter and the Core Commercial Area of the City Centre. Development proposals for culture, leisure, entertainment, visitor attractions,

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and accommodation and creative industries will only be permitted where they meet the criteria set out within the policy.

- 7.1.8 Furthermore, the Local Plan seeks to deliver the ambitious growth targets set for the City in the Portsmouth Economic Development and Regeneration Strategy including 7,000 new jobs. **Policy PLP50** also requires appropriate contribution to supporting infrastructure which includes educational infrastructure development needs.

Cumulative effects

- 7.1.9 The economy of Portsmouth is of sub-regional importance, with the International Port, naval presence and key sectors in defence, aerospace, and advanced manufacturing and technology, as well as tourism, cultural, digital, and creative industries stemming from the city's maritime influence. The support for economic growth and access to training and education is considered likely to lead to **cumulative positive effects** in the wider sub-region.

Conclusions

- 7.1.10 The spatial strategy and policy provisions of the draft Plan are considered for their potential to support the strategic objectives of the Plan to enable a strong and diverse economy that raises the quality of life and access to education and training opportunities for all. Overall **significant positive effects** are considered likely as a result. While the decision not to pursue a marine hub means some anticipated sectoral benefits will not be realised, this does not alter the overall conclusion that significant positive effects for the economy are likely as a result.

7.2 SA-2: Ensuring the vitality of the city centre and other town centres in Portsmouth

Commentary on the spatial strategy

- 7.2.1 **Policy PLP28** (Town Centres) supports development proposals that contribute towards the growth and development of identified centres in Portsmouth's Town Centre Hierarchy. It outlines that development proposals should provide main town centre uses within the city, town, district, local and neighbourhood centres that contribute positively to the function, vitality, and viability of the centres. Policy PLP28 states that the Core Commercial Area should be promoted and enhanced as the heart of the centre. It will be the focus for retail, commercial, leisure, culture, civic and service users, with active street frontages encouraged at ground floor level.
- 7.2.2 The ways in which the strategic sites and site allocations will contribute towards the vitality of centres in Portsmouth are outlined below:
- **Tipner West, Tipner East, Lakeside North Harbour and Horsea Island Strategic Open Space** will together contribute to the vitality of Tipner, Horsea Island and Cosham through mixed-use development. Notably, Tipner West will include shops selling convenience goods, including food, where the shop's premises do not exceed 280m².

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- **Portsmouth City Centre** will strengthen the identity and vitality of the city centre by delivering new homes, business premises, social / leisure venues, and community facilities. Policy PLP6 (Portsmouth City Centre) outlines that development proposals will be permitted if they encourage and support culture, civic, educational and leisure uses that add to the area's distinctiveness as the cultural, community and civic heart of the city centre.
- **Fratton Park & the Pompey Centre** will contribute to the vitality of Fratton by regenerating the area around the football stadium. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development must incorporate active frontages and entrances that promote activity and successfully engage with the public realm particularly along the off-road pedestrian and cycle route and in other appropriate locations.
- **St James' & Langstone Campus** will deliver medical facilities, educational facilities, and recreation, sports and other community facilities, contributing to the vitality of this part of Portsmouth.
- **Land West of Portsdown Technology Park**, which is allocated for 12,500m² of light industrial/ Research and Development floorspace, manufacturing, and/or storage or distribution; will contribute to the vitality of Paulsgrove.

Commentary on city-wide policy provisions

- 7.2.3 In addition to the strategic sites and site allocations discussed above, **Policy PLP29** (Small Local Shops) supports development proposals for small local shops or services outside the City, town, district, local and neighbourhood centres if they meet the criteria set out within the policy. This includes, but is not limited to, the requirement for the shop to primarily sell essential goods and provide services that meet day-to-day shopping and service needs, such as food, to visiting members of the public.
- 7.2.4 Also of relevance, **Policy PLP49** (Public Realm) supports development proposals that consider opportunities to enhance the public realm in their design. This is to ensure that the public realm is safe, healthy, accessible for all, inclusive, multifunctional, attractive, well-connected, legible, and easy to maintain, and that it relates to the local, cultural, and historic context. Public realm enhancements will ultimately boost user experience and support long-term vitality at town centres.
- 7.2.5 Finally, **Policy PLP52** (New & Existing Community & Leisure Facilities) is in place to ensure that development proposals for new and/or expanded community and leisure facilities are accessible and inclusive to the local communities it serves.

Cumulative effects

- 7.2.6 The city has a wider draw as a major cultural, commercial and tourism centre for the sub region. The suggested improvements are likely to support the long-term vitality of centres in Portsmouth, particularly within the City Centre which forms much of the draw for tourism and culture. **Positive cumulative effects** are considered likely overall.

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Conclusions

- 7.2.7 The detailed guidance and support provided for Portsmouth's centres, including growth at key locations, are considered to provide significant support for long-term vitality. As a result, **significant positive effects** are anticipated overall.

7.3 SA-3: Promoting sustainable transport in Portsmouth

Commentary on the spatial strategy

- 7.3.1 Portsmouth's relatively compact size lends itself to walking and cycling and it is well connected to the wider region and to London and Europe by rail, ferry, and road. Sustainable transport is a key consideration for Portsmouth in future growth, reflecting the context of a climate emergency, issues with poor air quality, and the strategic transport network in Portsmouth dominated by its maritime influences. Alongside many other busy cities around the UK, Portsmouth has been identified as a city that needs to reduce air pollution levels as quickly as possible. In Portsmouth, the main pollutants are principally the products of combustion from road traffic – mainly nitrogen dioxide (NO₂). There are currently five Air Quality Management Areas (AQMAs) predicted to exceed the annual NO₂ National Air Quality Objective (NAQO) and the Council declared a charging Clean Air Zone (CAZ) in 2021. The CAZ has seen 94% of monitored areas comply with air quality standards. Despite this, government assessments reveal a critical need for it to be continued as data reveals persistent challenges in specific locations. There are three areas that continue to have pollution levels above the limits set by Government and a further nine that also continue to be at risk of exceeding. PCC are therefore working in collaboration with the Joint Air Quality Unit (JAQU) to understand why success was not achieved when expected.
- 7.3.2 The merits and constraints associated with the strategic sites allocated through the draft Plan, alongside how site-specific policy seeks to positively impact this objective and address constraints, are outlined below:
- **Tipner West, Tipner East and Horsea Island Strategic Open Space** are located immediately adjacent to the M275 motorway at the northwest part of Portsea Island. Tipner West and Tipner East are in proximity to the Portsmouth AQMA No. 11 which covers a section of the M275 motorway to the south. Policy PLP3 (Tipner West) and Policy PLP9: Horsea Island Strategic Open Space safeguard land for the landfall of a new bridge, as shown on the Policies Map, connecting Tipner West to Horsea Island for the use of sustainable transport modes only. Meanwhile, Policy PLP4 (Tipner East) outlines that the development of a new multi-modal transport hub for the city is a key component of the vision for Tipner East. Development proposals will be permitted provided that they:
 - Break down the barriers, both physical and perceived, created by the M275 motorway and Portsbridge Creek (Policy PLP3).
 - Incorporate on-site car parking for residents, workers and visitors (Policy PLP4 only), including car-free streets wherever feasible with

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clearly defined connections to 'Mobility as a Service' and other sustainable transport modes, including bus services at the Tipner Park and Ride facility (Policy PLP3).

- Improve pedestrian and cycle provision/ links connecting Port Solent and Tipner to the City Centre, nearby public open spaces, recreational facilities including the Mountbatten Centre and other local shops and services (Policies PLP3 and PLP9).
- Provide safe and efficient vehicular access to and from the M275 and the surrounding non-strategic road network (Policy PLP3).
- Safeguard the routes of the Pilgrims Trail, the King Charles III England Coast Path and National Cycle Route 22 which pass through Tipner East (Policy PLP4 only).
- Deliver or contribute proportionately to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment and/ or Infrastructure Delivery Plan, including the proposed bridge connecting Tipner West with Horsea Island (Policy PLP3 only).
- **Lakeside North Harbour** is bound by the strategic road network; the M27 to the south, A27 to the east and north, and M275 to the west. A shared footpath / cycle way runs to the north of the site, linking it to the city and the wider area, and a shuttle bus runs to the nearby Cosham District Centre, where Cosham Railway Station is located. To promote sustainable modes of travel to and from the site, the Plan states that all development proposals to expand the business offer must safeguard and where possible enhance pedestrian and cycle links to the City Centre and Cosham. Policy PLP5 (Lakeside North Harbour) outlines that development proposals will be permitted provided that:
 - Effective access arrangements are made that are safe and suitable for all users. A new secondary access point at Lakeside to be provided on to the Western Road (A27) in accordance with the general arrangement plan of the Strategy Transport Assessment or such alternative as may be developed and agreed with PCC Highways.
 - A Travel Plan is made to minimise car use by current and prospective occupants of Lakeside and to maximise use of sustainable modes of transport.
- **Portsmouth City Centre** extends from Hope Street in the north to Guildhall Walk and Winston Churchill Avenue to the south. The site contains Portsmouth & Southsea Railway Station. However, a railway viaduct forms a physical barrier to the area to the south. It overlaps with Portsmouth AQMA No. 11 in the north and Portsmouth AQMA No. 7 in the south. Policy PLP6 (Portsmouth City Centre) outlines that development within the Station Road Regeneration Area should contribute to improved connectivity within the City Centre and mitigate the impact of additional users. In addition, Policy PLP6 outlines that development proposals will be permitted if they:
 - Improve pedestrian and cycle connectivity to the surrounding residential areas.

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- Incorporate car-free streets wherever feasible, with 'Mobility as a Service' and sustainable transport modes prioritised.
- Provide evidence that air quality in adjoining AQMAs is not worsened; and
- Provide a Travel Plan to demonstrate how it is contributing to a shift to sustainable and public transport in the City Centre (Major Development proposals only).
- **Fratton Park & the Pompey Centre** is in close proximity to Fratton Railway Station and is well served by the bus network. However, the existing road layout and location of the railway line prevent easy pedestrian and cycle movements to and throughout the site. It is also adjacent to Portsmouth AQMA No.9 to the east. Policy PLP7 (Fratton Park & the Pompey Centre) requires that land is safeguarded for the connection of an appropriate, accessible off-road pedestrian and cycle route connecting Fratton Station to the Pompey Centre and Fratton Park, which shall be provided with wider public realm improvements. Development will be expected to integrate with this route. New development should consider the impact on the capacity of the train station and routes to it.
 - Effective access arrangements are made that are safe and suitable for all users including the provision of, or safeguarded land for any future drop off/pick up on match day Park & Ride services from Tipner; and
 - A Travel Plan and Transport Assessment must be submitted as part of any proposal. These must assess the potential transport impacts and implications, propose mitigation measures, and identify opportunities to implement effective sustainable transport initiatives.
- **St James' & Langstone Campus** is located away from the primary road network. Policy PLP8 (St James' & Langstone Campus) outlines a Travel Plan and Transport Assessment must be submitted as part of any proposal. These must assess the potential transport impacts and implications, propose mitigation measures, and identify opportunities to implement effective sustainable transport initiatives. Policy PLP8 also outlines that development proposals will be permitted if they:
 - Provide safe, permeable, and convenient north-south pedestrian and cycle links from Locksway Road to Longfield Road and across the wider site (St James).
 - Provide off-site highway network improvements (St James).
 - Retain and enhance the north-south bus / cycleway connection along Furze Lane (Langstone Campus).
 - Provide safe accessible off-road walking and cycling routes through the site are provided, linking areas to the north and south (Langstone Campus).

7.3.3 Five of the six sites allocated through the draft Plan are all located in sustainable locations, particularly **Somers Orchard** and **St John's College**, which are in/ near the city centre. Fraser Range is considered slightly more distant. In terms of non-strategic sites, whilst site-specific policies play a role, it is considered that the draft city-wide policies (explored under the next

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heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites manage the potential negative effects arising from development.

Commentary on city-wide policy provisions

- 7.3.4 Air quality is primarily addressed through **Policy PLP35** (Air Quality and Pollution), which states that planning permission will only be granted for development proposals when it can be demonstrated, in a proportionate manner, that they will not contribute to and will not be subject to unacceptable levels of pollution which cannot be mitigated.
- 7.3.5 The focus of transport is **Policy PLP47** (Movement and Transport), which states that development proposals will be permitted where they help deliver a people centred travel network that prioritises walking, cycling, public and shared transport, in line with Local Transport Plan 4 (LTP4). The policy supports growth in highly accessible locations with good access to public transport services and other sustainable transport. It also addresses safety by ensuring that development proposals give priority to the needs of pedestrians, cyclists, users of mobility aids, and other non-motorised forms of transport.
- 7.3.6 **Policy PLP48** (Access and Parking) states that development will be permitted where it is located and designed in such a way that it seeks to discourage car use and encourages travel by other modes, unless off street parking provision can be justified. This could include car free development. Development proposals should incorporate charging points for electric vehicles (EVs) and secure cycle storage and encourage car share schemes.
- 7.3.7 More broadly, **Policy PLP49** (Public Realm) supports development proposals that consider opportunities to enhance the public realm in their design. This includes encouraging walking and cycling and easing the movements of pedestrians, cycles, cargo-bikes, scooters, pushchairs, wheelchairs, mobility scooters and vehicular traffic within the site and to wider focal points within the city. In addition, **Policy PLP50** (Infrastructure Delivery) is in place to ensure that development proposals include suitable infrastructure provision.

Cumulative effects

- 7.3.8 The Plan recognises and supports wider city and sub-regional aspirations for transport, including LTP4. The draft Plan supports the provisions of the city's transport plan which implemented a Clean Air Zone in Portsmouth in 2021. The Plan also provides wider support for air quality, particularly through focused efforts to improve sustainable transport connections and reduce the need to travel. On this basis, **positive cumulative effects** are considered likely.

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Conclusions

- 7.3.9 Overall, the Plan seeks to deliver new infrastructure improvements and prioritises sustainable transport access, particularly active travel, in direct support of the strategy objectives for a healthy and happy city, a green city and a city with easy travel. The Plan also requires development to mitigate its impact on the strategic and local road network. As a relatively compact and accessible city, **long-term minor positive effects** are considered likely overall.

7.4 SA-4: To tackle climate change, flooding and coastal change in Portsmouth

Commentary on the spatial strategy

- 7.4.1 The construction of new homes and the increase in number of dwellings in the city will ultimately increase pressures on existing highways infrastructure and affect air quality and overall emissions. The spatial strategy seeks to maximise opportunities to facilitate growth in sustainable locations, which are supported by infrastructure and sustainable transport choices, and which reduce the need to travel (see SA objective 3).
- 7.4.2 Focusing growth at strategic sites at the City Centre and other town centres, the Plan presents opportunities to incorporate strategic measures to address climate change and per capita emissions, such as district heating systems, new open spaces, sustainable travel opportunities, and strategic green infrastructure provisions. In terms of accessibility, sites within the City Centre, Fratton, and Cosham are located within 800m of a train station and considered overall as highly accessible locations – particularly within the City Centre.
- 7.4.3 Seeking higher residential densities in areas of high accessibility such as transport nodes / corridors and retail areas is considered to contribute positively towards meeting climate change objectives, supporting the vitality of local retail areas and the promotion and use of sustainable transport. This could have secondary positive effects for climate change mitigation from a greater level of self-containment and the lower emissions from reduced personal vehicle use.
- 7.4.4 Portsmouth's low-lying coastal location means that the city is susceptible to flood risk, not only from inundation but also surface water, rising ground water levels and possible wastewater infrastructure overflow during extreme weather events. With much of Portsmouth constrained by flood risk (notably large areas in the north, east, and south of Portsmouth), the spatial strategy includes allocations located within Flood Risk Zones 2 and 3, particularly within areas reliant on existing and future flood defences.
- 7.4.5 The flood risk associated with the strategic sites allocated through the draft Plan, alongside how site-specific policy seeks to address this, is outlined below, recognising that policy has been informed by the Level 2 Strategic Flood Risk Assessment (SFRA):
- **Tipner West**, and **Tipner East** are flat and low-lying, with significant parts lying in Flood Zones 2 and 3. Both sites were assessed as part of the

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Level 2 Strategic Flood Risk Assessment, which made a number of recommendations to avoid and control flood risk. These recommendations include a sequential approach to land use planning within the site, new flood defences, ground raising, secondary defences, and future-proofing. Tipner West will deliver urgently required sea defences for the northern part of Portsea Island, whilst Tipner East will involve the installation of flood barriers prior to the commencement of development. Policies PLP3 (Tipner West) and PLP4 (Tipner East) outline that development proposals will be permitted provided that they i) integrate green and blue infrastructure into the masterplanning and design of the development, and ii) seek to mitigate the urban heat island effect and uncomfortable / unsafe wind conditions.

- **Lakeside North Harbour** is entirely within Flood Zone 1. However, it is estimated that in 100 years much of the site, which was built on reclaimed land, will be in Flood Zones 2 and 3. The site was assessed as part of the Level 2 Strategic Flood Risk Assessment, which made a number of recommendations to avoid and control flood risk. Policy PLP5 (Lakeside North Harbour) outlines that development proposals will be permitted provided that a site-specific Flood Risk Assessment will be prepared in accordance with the recommendations of the Strategic Flood Risk Assessment Levels 1 and 2 supporting the Plan. This is in addition to the provision of Sustainable Drainage Systems (SuDS) to mitigate the risk of surface water flooding.
- **Portsmouth City Centre** is entirely within Flood Zone 1 but in 100 years, the southwest extent is expected to be in Flood Zone 2.
- **Fratton Park & the Pompey Centre** is entirely within Flood Zone 1 and this is unlikely to change in 100 years. However, Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development proposals will be permitted if they provide SuDS to mitigate the risk of surface water flooding.
- **St James' & Langstone Campus** is entirely within Flood Zone 1. However, it is estimated that in 100 years the eastern extent of the site will be in Flood Zones 2 and 3. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted provided that a site-specific Flood Risk Assessment will be prepared in accordance with the recommendations of the Strategic Flood Risk Assessment Levels 1 and 2 supporting this Local Plan. This is in addition to the provision of SuDS to mitigate the risk of surface water flooding.
- **Horsea Island Strategic Open Space** is entirely within Flood Zone 1 and this is unlikely to change in 100 years.

7.4.6 With regards to the site allocations, **The News Centre, Port Solent, and Fraser Range** are within Flood Zones 2 and 3.

Commentary on city-wide policy provisions

7.4.7 Notably, plan development has been supported by the development of a Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2, which has sought to assist the Council in identifying appropriate avoidance and mitigation requirements for development within areas at risk of flooding and has fed into the policies being proposed.

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- 7.4.8 With a focus on climate change adaptation, **Policy PLP36** (Coastal Zone) outlines that development proposals in the Coastal Zone will be permitted where they, amongst other considerations, are consistent with the Shoreline Management Plan and South Inshore and South Offshore Marine Plans.
- 7.4.9 **Policy PLP31** (Flooding) outlines criteria for development proposals that will need to be met to be permitted. This includes, but is not limited to, where they seek to reduce the impact and extent of all types of flooding; are accompanied by a site-specific Flood Risk Assessment; and the proposal meets the sequential and exception tests as set out in Government policy and guidance.
- 7.4.10 Adding on to the above, **Policy PLP32** (Sustainable Drainage Systems) supports the use of SuDS to manage surface water flood risk. Development proposals will be permitted where they ensure that surface run-off rates from the proposed development do not exceed the existing surface run-off rates (with a betterment preferred). Policy PLP32 also outlines that all applications should minimise the amount of hard landscaping and incorporate permeable surfaces and methods for rainwater harvesting to reduce surface water run-off.
- 7.4.11 With a focus on climate change mitigation, **Policy PLP2** (Climate Emergency) outlines that development proposals will be supported if they meet the criteria set out within the policy. This includes, but is not limited to, reducing greenhouse gas emissions; delivering a net zero energy standard in new buildings; and adapting and being resilient to the impacts of local climate change.
- 7.4.12 **Policy PLP33** (Sustainable Construction and Onsite Renewable Energy) outlines that development proposals will be permitted where they are designed to reduce their impact on the environment during construction. This includes considering embodied emissions and the energy hierarchy. Importantly, the retention and retrofitting of existing buildings will be prioritised over demolition and replacement.
- 7.4.13 Finally, **Policy PLP34** (Renewable Energy) supports development proposals for wind turbines and solar photovoltaic arrays in appropriate locations provided they do not result in adverse impacts on living conditions. Development proposals for community renewable and low carbon energy generation developments will also be supported.

Cumulative effects

- 7.4.14 The Plan aligns with the wider flood risk and coastal management plans in place for the city and Solent region. The Plan seeks to work in tandem with the Shoreline Management Plan to ensure coastal defences will be resilient to long term coastal change and sea level rise. The Council will continue to work with the Environment Agency to achieve the best possible outcomes for new development and flood risk along the shoreline, including at Tipner.
- 7.4.15 Whilst increased pressures from further development in this coastal region have the potential to lead to cumulative adverse effects in relation to coastal change and sea level rises, the policy provisions which seek to deliver more sustainable development with increased flood and climate resilience are likely to ensure that significant cumulative effects are avoided.

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Conclusions

- 7.4.16 The strategic growth locations can support a good mix of uses within the city and lead to economies of scale to the benefit of climate resilience. Particularly by enabling the delivery of new or upgraded transport infrastructure, low carbon heat and power, flood resilience measures, and community infrastructure and open spaces, and positive effects are anticipated in this respect. Flood risk is a key constraint to growth in the city, and flood resilience in line with the proposed policy provisions will be key to ensuring that long-term adverse effects are avoided. However, as the plan strategy includes housing within high flood risk zones, **minor negative effects** are concluded.

7.5 SA-5: Delivering high quality homes in Portsmouth

Commentary on the spatial strategy

- 7.5.1 **Policy PLP16** (Housing Target) sets a housing target for Portsmouth of at least 11,369 net additional homes during the plan period (2025-2040), equating to a net annual average provision of approximately 588 homes per year. Given the geographical constraints to development in Portsmouth, the Council are pursuing a supply-led strategy, accepting that housing needs as calculated by the NPPF standard method cannot be met with the land available for development in the City.
- 7.5.2 New homes will be delivered across five of the seven strategic sites allocated through the draft Plan, as follows:
- **Tipner West** deliver 1,000 new homes.
 - **Tipner East** will deliver 1,056 new homes.
 - **Portsmouth City Centre** will deliver 3,458 new homes.
 - **Fratton Park & the Pompey Centre** will deliver approximately 460 new homes, with land safeguarded for additional homes on the car park of the Pompey Centre.
 - **St James' & Langstone Campus** will deliver 405 (417 gross) homes including elderly person and sheltered accommodation.
- 7.5.3 Five of the six site allocations will also deliver new homes, as follows:
- **Port Solent** will deliver 500 new homes.
 - **St John's College** will deliver 212 new homes.
 - **Fraser Range** will deliver 134 new homes.
 - **The News Centre** will deliver 100 new homes.
 - **Somers Orchard** will deliver 566 new homes.
- 7.5.4 Recognising the constraints to development in the city, the Council identify that housing needs will not be met within the City's administrative boundary. Partnership working, including as part of the Partnership for South Hampshire (PfSH), has sought to agree where the identified shortfall in

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housing supply could be delivered outside of the city's administrative boundary through the Duty to Cooperate. **Policy PLP16** outlines that 800 homes allocated in the Fareham Local Plan will contribute to Portsmouth's unmet need.

Commentary on city-wide policy provisions

- 7.5.5 Affordable homes are addressed through **Policy PLP17** (Affordable Homes), which outlines that development proposals where more than 10 residential dwellings will be provided (or where the site has an area of more than 0.5ha), will be permitted where they: a) provide 30% of residential dwellings as affordable homes; b) provide the tenure mix of affordable homes as 70% affordable rent and/ or social rent and 30% as another affordable route to home ownership (including shared ownership or discounted market sales housing); and c) are indistinguishable in design and appearance from the open market houses and integrated throughout the site.
- 7.5.6 Housing mix is addressed through **Policy PLP18** (Housing Mix), which states that development proposals for residential development, including as part of a mixed-used development, will be permitted where they provide a mix of dwelling sizes to meet projected future household needs for the City. Policy PLP18 outlines the housing mix in terms of size for both market homes and affordable homes (both owned and rented). It also highlights that all homes are to be built to accessible and adaptable standards, whilst at least 5% of all new market homes, and at least 10% of all affordable homes, are to be built as 'wheelchair accessible' dwellings (according to Building Regulations).
- 7.5.7 **Policy PLP19** (Housing for Specific Groups) outlines that development proposals will be supported for specialist housing where this is an identified need. This includes community-led development such as self-build or custom-build homes; specialist and supported housing; purpose-built student accommodation; Build to Rent homes; communal or co-living homes; and service personnel and service family accommodation. Policy PLP19 sets out specific requirements for self-build or custom-build homes, purpose-built student accommodation, Build to Rent homes, and communal or co-living homes.
- 7.5.8 **Policy PLP20** (Houses in Multiple Occupation) outlines that development proposals for new HMOs, and changes of use to existing HMOs, will only be permitted under specific circumstances, which are set out within the policy. Notably, a new HMO will only be permitted when less than 10% of residential properties within a 50-metre radius of the area surrounding the application property are in existing use as a HMO. This is to protect non-HMO residential properties and the amenity of nearby residents from the potential adverse impacts of HMOs.
- 7.5.9 **Policy PLP21** (Residential Density) states that residential development, including mixed-use schemes that have a residential element, should be high density (at least 120dph) in areas of high accessibility; medium density (at least 80dph) across the City's core residential areas; and lower density (at least 40dph) in the suburban edge. Meanwhile, **Policy PLP22** (Space Standards) is in place to ensure that development proposals meet the external and internal space needs of occupiers.

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- 7.5.10 More broadly, **Policy PLP23** (Estate Renewal) supports development proposals within certain estates owned by the City Council, provided they meet the criteria set out within the policy. These estates are Paulsgrove, Portsea, Buckland, Landport, and Somertown and North Southsea. Development proposals for Gypsies, Travellers & Travelling Showpeople accommodation are addressed through **Policy PLP24** (Gypsies, Travellers & Travelling Showpeople).

Cumulative effects

- 7.5.11 The Local Plan states that the City's housing need cannot be met within the City's boundaries due to its constrained geography, which ultimately has a cumulative impact on the housing market in the wider area. As noted above, a contribution of 3,916 homes towards unmet housing need will be sought from neighbouring local authorities through the Duty to Cooperate. This includes the 800 homes allocated to Portsmouth in the Fareham Local Plan, from 2023. This could add development pressures to communities outside of the Plan area, particularly in the development of greenfield land within the sub-region. However, it is recognised that the constraints to growth within the city itself have been highlighted through the joint PfSH work to date, and the local planning authorities across the partnership area are working together to plan for Portsmouth's unmet needs, including through continued exploration of Broad Areas of Search for Growth. The partnership working has the potential to support **significant cumulative positive effects** in the long-term, with strategic growth planned at the wider sub-regional scale. Furthermore, most of the sites identified to meet the housing target within the city are brownfield, which cumulatively will positively affect sustainable development of the city.

Conclusions

- 7.5.12 Overall, **significant positive effects** are concluded in relation to this objective, recognising that the Plan puts forward a viable housing strategy at this stage, though this will require continued monitoring and partnership working to ensure longer-term housing needs can be planned for.

7.6 SA-6: Promoting healthy communities

Commentary on the spatial strategy

- 7.6.1 Portsmouth has more acute health inequalities and lower life expectancies than surrounding areas. There are also large inequalities between different parts of the city, for example males in areas of higher deprivation are dying 9.5 years earlier than those in the city's least deprived areas and there is a gap in life expectancy of 6.0 years for females. The Joint Strategic Needs Assessment (JSNA) and Public Health England Local Authority Profiles provide further snapshots of health and well-being in the city and have been used to identify priorities for health and well-being in the city which are reflected in the Portsmouth Health and Wellbeing Strategy 2018-2021.
- 7.6.2 The proposed spatial strategy focuses significant development at strategic development locations, many of which are located close to train stations and in areas of relatively good accessibility, particularly within the city centre. This will support objectives on healthy communities, encouraging

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sustainable transport use and short walking and cycling distances to key services and facilities, which will in turn encourage healthy lifestyles across communities. This is a key issue for the City Centre strategic site considering the AQMAs present.

7.6.3 The merits and constraints associated with the strategic sites allocated through the Local Plan, alongside how site-specific policy seeks to positively impact this objective and address constraints, are outlined below:

- **Policy PLP3 (Tipner West) and PLP9: Horsea Island Strategic Open Space** safeguard land for the landfall of a bridge, linking Tipner West to Horsea Island. The bridge will provide easy access for new residents to Horsea Island Strategic Open Space for dog walking and other informal recreation. The Tipner West site will also include meeting places for the principal use of the local community. In terms of wider connectivity, Policy PLP3 sets a requirement for enhanced pedestrian and cycle provision links connecting Tipner West to the City Centre, nearby public open spaces, recreational facilities, and other local shops and services. Strong connectivity in this respect is also a key objective of **Tipner East** (Policy PLP4).
- **Portsmouth City Centre** will provide a new park at the City Centre North part of the site. Policy PLP6 (Portsmouth City Centre) outlines that development proposals will be permitted provided that they protect and enhance existing open spaces.
- **Fratton Park & the Pompey Centre** is located in walking distance to the services and facilities on offer in Fratton, including Fratton Railway Station. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that land will be safeguarded for the connection of an appropriate, accessible off-road pedestrian and cycle route connecting Fratton Station to Fratton Park, which shall be provided with public realm improvements. Furthermore, development proposals will be permitted provided that a network of interconnecting green and public access corridors will be delivered throughout, enhancing the level of green infrastructure and supporting healthy communities.
- **St James' & Langstone Campus** contains playing fields which are used by both the University and several local sports clubs. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted if they retain, where possible, playing pitches and fields and public access to them. Policy PLP8 also outlines that development proposals will be permitted provided that they integrate the following open spaces into new development to ensure public access is retained: The St James's Hospital Cricket Pitch, the Dog Park, land to the north-west of the listed Chapel and land to the east and west of Chapel Way.
- **Horsea Island Strategic Open Space** is allocated for the development of a 64 hectare strategic public open space. Policy PLP9 (Horsea Island Strategic Open Space) outlines that development proposals will be permitted provided that the new open space provision considers the needs and safety of the intended users and needs to provide accessible multi-functional spaces.

7.6.4 With regards to the site allocations, **Port Solent** benefits from being located adjacent to strategic site Horsea Island Strategic Open Space. Meanwhile,

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Somers Orchard and **St John's College** are located in proximity to the city centre, in walking distance of services and facilities here.

Commentary on city-wide policy provisions

- 7.6.5 Policy **PLP35** (Air Quality and Pollution) states that planning permission will be granted where development proposals demonstrate how health inequalities and the wider determinants of health and wellbeing have been incorporated into the design, layout and the use of the development, and its impact on the mental and physical health and wellbeing of occupiers. In addition, major development proposals will be required to undertake an accompanying Health Impact Assessment, demonstrating how the planning application has been informed by the findings of the assessment in regard to air quality.
- 7.6.6 Policy **PLP45** (Open Space) supports development proposals where they seek to create, protect and/or enhance open space, and if practicable, improve accessibility to open space. Enhancements of existing open spaces should seek to maximise their quality, multifunctionality and accessibility. Development proposals that would result in the net loss of open space will only be allowed in special circumstances, which are set out within the policy. Development proposals for more than 50 new homes will be permitted where they provide an area of open space to the ratio of 1.65ha per 1,000 people.
- 7.6.7 In addition to the above, Local Green Spaces (LGSs) are designated and protected through **Policy PLP46** (Open Green Spaces).

Cumulative effects

- 7.6.8 Cumulative effects are also anticipated in relation to improvements to accessibility, resulting from the in-combination effects of enhancements to public transport and cross-boundary walking and cycling networks.
- 7.6.9 The draft Plan seeks to protect and enhance the strategic network of biodiversity, open space, and green infrastructure, extending throughout the city and the wider region. The provision of natural and semi-natural green space through draft Plan proposals and projects (i.e., Green Corridors in Cosham, the Northern Road 'green corridor', green infrastructure provision at Pompey Centre, and regeneration in the City Centre) will therefore deliver benefits at a sub-regional and local level, promoting access to greenspaces, and benefitting deprived communities.
- 7.6.10 Development proposed through the Plan could affect the implementation of Portsmouth's Local Air Quality Action Plan, AQMAs and the Clean Air Zone, as well as the potential for cumulative impacts. The Plan seeks to maximise opportunities to improve air quality and mitigate impacts through the delivery of strategic sites, supporting improved traffic and travel management, and infrastructure provision and enhancement.

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Conclusions

- 7.6.11 On balance, it is appropriate to conclude that the draft Plan could lead to **significant long-term positive effects** in terms of promoting healthy communities within the city boundaries. Policies are coordinated to deliver positive health outcomes within the city, providing new homes, employment and community and transport infrastructure which prioritise healthy lifestyles, increase safety and reduce deprivation. However, it is recognised that capacity at primary health care services will need to be a consideration for continued development in Portsmouth, which will likely be assessed as part of the required supporting Health Impact Assessments in major development proposals.

7.7 SA-7: Conserving and enhancing the historic townscape

Commentary on the spatial strategy

- 7.7.1 The city's numerous heritage assets are valued for their architectural, aesthetic, historic, communal, and evidential contribution to the City. Notably, Portsmouth is one of the UK's principal naval dockyards and is of national and international significance. The historic buildings and townscape reflect the City's built heritage through the extensive network of military defences and in the barracks and other spaces / sites associated with the navy's long historic presence. Its heritage makes a vital contribution to its distinctiveness, sense of place and quality of life for its residents.
- 7.7.2 The heritage constraints associated with the strategic sites (and site allocations) allocated through the Local Plan, alongside how site-specific policy seeks to positively impact this objective and address these constraints, are outlined below:
- **Tipner West** notably contains four grade II listed buildings, which form a rare and unusual group of historic early ordnance magazines. Policy PLP3 (Tipner West) outlines that the listed buildings located on Tipner West must be retained, restored and re-used. Development proposals must fully assess the significance of these assets and give great weight to the conservation and where possible enhancement of their fabric and/ or setting. Policy PLP3 also outlines that development proposals will be permitted provided that they demonstrate a full understanding of the contribution of views towards the site, to the setting and therefore significance of both the Scheduled Portchester Castle, and the D-Day Slipways adjoining Horsea Island East. Consideration must also be given to non-designated archaeology, with mitigation proportionate to the significance of any finds. **Tipner East** does not contain any designated heritage assets; the nearest are the four grade II listed buildings within Tipner West & Horsea Island, approximately 220m northwest of the site on the other side of the M275 motorway.
 - **Lakeside North Harbour** does not contain any designated heritage assets; the nearest is a grade II listed building approximately 80m east of the site. There is also a scheduled monument approximately 260m south

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of the site. The site is also in proximity to Old Wymering Conservation Area, which is located to the north of the site on the other side of the A27.

- **Portsmouth City Centre** contains 27 listed buildings, including three grade II* listed buildings. It also contains grade II listed park and garden 'Victoria Park' and overlaps with the Guildhall and Victoria Park and Mile End Conservation Areas. Policy PLP6 (Portsmouth City Centre) outlines that development within the Guildhall Cultural Regeneration Area should protect and enhance the setting of heritage assets and the Guildhall and Victoria Park Conservation Area. More broadly, Policy PLP6 requires that any proposal for Major Development within the City Centre should demonstrate how its design responds positively to its heritage significance.
- **Fratton Park & the Pompey Centre** does not contain any designated heritage assets; the nearest is a grade II listed building approximately 100m northeast of the site. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development proposals will be permitted provided that the design, height and density of development integrates with and complements the existing context and character of the site.
- **St James' & Langstone Campus** contains two grade II listed buildings. It is also in proximity to Milton Locks Conservation Area to the southeast. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted provided that they retain and conserve the significance and setting of these listed buildings and all other historic assets in the hospital grounds (St James). In addition, all proposed development must be accompanied by a heritage assessment (St James).
- **Horsea Island Strategic Open Space** does not contain any designated heritage assets; the nearest is a scheduled monument approximately 130m south of the site. Policy PLP9 (Horsea Island Strategic Open Space) outlines that development proposals will be permitted provided that they allow views to and from the open space and notable landmarks within the zone of visibility including Portchester Castle and the Spinnaker Tower.
- **Port Solent** (site allocation) does not contain any designated heritage assets, however the site offers the potential for views towards Portchester Castle. Policy PLP11 (Port Solent) outlines that that these views should be protected. Specifically, the design, scale and massing of the scheme needs to respond sensitively to the significance of Portchester Castle including its setting, taking into account its presence in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance.

7.7.3 In terms of allocation sites, whilst site-specific policies play a role, it is considered that the city-wide draft Plan policies (explored under the next heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites avoid, and where necessary, mitigate and manage the potential negative effects that may arise.

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Commentary on city-wide policy provisions

- 7.7.4 The draft Plan proposes a number of policies that support and guide development to minimise the impact of the spatial strategy on the historic environment, and maximise opportunities for enhancements, particularly in terms of accessibility.
- 7.7.5 **Policy PLP53** (Historic Environment) outlines that development proposals will only be permitted where they conserve or enhance the City's heritage assets in a manner appropriate to their significance. Development proposals which affect heritage assets, or their setting, will be determined with regard to the significance of the asset. Where a development proposal would impact on the fabric or setting of a designated or non-designated heritage asset, the applicant will be required to provide a supporting Heritage Statement. Development proposals that would improve the condition of heritage assets that are considered to be 'at risk' through neglect, decay or other threats will be encouraged and supported.
- 7.7.6 **Policy PLP54** (Listed Buildings) states that development proposals which affect a listed building or its setting will only be permitted where: a) they preserve or enhance the significance of the listed building and its setting by demonstrating that loss of historic fabric and detail of significance is avoided; and b) harm to the significance of the listed building or its setting is considered to be outweighed by public benefits by the Council. Development proposals will be refused planning permission and/or listed building consent where they cause substantial harm to a listed building or its setting.
- 7.7.7 **Policy PLP55** (Conservation Areas) only permits development proposals within a conservation area, or within its setting, where they preserve or enhance the character or appearance of the conservation area.
- 7.7.8 **Policy PLP56** (Archaeology) seeks to protect archaeological assets and their setting from harm as a result of development. Sufficient information in a Heritage Statement is required to allow an informed assessment of the significance of the archaeological heritage asset and its setting, and the impact of the proposed development on that significance. There will be a presumption in favour of preservation in-situ for scheduled monuments and other archaeological heritage assets of equivalent significance.

Cumulative effects

- 7.7.9 The city's economy is boosted by its tourism and cultural offer, stemming largely from its Naval Heritage and coastal environment. The city attracts visitors from around the world, and therefore regeneration proposed through the spatial strategy is likely to support the sub-regional marine and maritime sector. **Minor positive cumulative effects** are considered likely in this respect.
- 7.7.10 Additional homes may also need to be sought beyond the constrained city boundaries (through the 'Duty to Cooperate') within neighbouring authority areas, adding development pressures to land within the sub-region, which may cumulatively affect the wider historic environment setting.

Conclusions

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- 7.7.11 Overall, the draft Plan policies seek to ensure that development retains and enhances the significance of the historic environment and heritage assets and their settings (including designated and non-designated sites). Encouraging the retention of historic buildings and their reuse is anticipated to lead to **minor positive effects**, contributing towards meeting objectives not only within heritage protection and accessibility, but also in the related area of urban design and achieving a strong competitive economy.
- 7.7.12 Protection is also provided to ensure that development appropriately considers archaeology as a prominent historic asset within the city. The policies are likely to reduce the extent of the negative effects identified; however, the overall impact remains **uncertain** at this stage as it is ultimately dependent on-site level schemes demonstrating successful design, layout and integration.

7.8 SA-8: Requiring good urban design in Portsmouth

Commentary on the spatial strategy

- 7.8.1 The spatial strategy provides direct links to elements of good design, including by focussing significant new growth requirements in key locations that are, or can be made sustainable, with high levels of accessibility which in turn will limit the need to travel. Sites within the City Centre and Fratton offer a choice of transport modes, with good bus and rail links, and are therefore considered overall as highly accessible locations, with strategic growth likely to encourage walking and cycling and a modal shift.
- 7.8.2 Furthermore, delivering growth at scale through strategic sites is considered likely to unlock higher and bespoke standards of design that provide high quality place making. The spatial strategy seeks to deliver strategic development / regeneration throughout the city that reflects and enhances each area's defining characteristics, while also achieving high design quality and shaping the future of the city.
- 7.8.3 The strategic sites (and site allocations) allocated through the draft Plan address good urban design through their site-specific policies, as outlined below:
- Policies PLP3 (**Tipner West**) and PLP4 (**Tipner East**) for the separate sites outline that development proposals will be permitted provided that they create a new landmark gateway to the City of Portsmouth to be demonstrated through a conceptual site-wide masterplan with an accompanying design code framework that delivers beautiful place-making and has regard to the National Model Design Code.
 - Policy PLP5 (**Lakeside North Harbour**) outlines that development proposals will be permitted provided that:
 - A masterplan and design code for the whole site is prepared, submitted and approved as part of a site-wide planning application, to ensure that all future development at Lakeside is brought forward in a holistic manner; and

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- A high standard and quality of design is achieved which is sympathetic to the existing high quality, campus-style setting of the business park and the areas and networks of recognised ecological value.
- Policy PLP6 (**Portsmouth City Centre**) outlines that development proposals will be permitted provided that they demonstrate how its design enhances the City Centre's appearance and considers the needs of its users through the provision of a design code.
- Policy PLP7 (**Fratton Park & the Pompey Centre**) outlines that development proposals will be permitted provided that the design, height and density of development should integrate with and complement the existing context and character of the site and be developed in accordance with other policies within the draft Plan.
- Policy PLP8 (**St James' & Langstone Campus**) outlines that development proposals will be permitted provided that the design and layout conserves or enhances and appropriately integrates into the locally distinct parkland landscape setting and open character of the site.
- Policy PLP9 (**Horsea Island Strategic Open Space**) outlines that development proposals will be permitted provided that they take account of the approved plan for landscaping and maintenance of the former landfill site which impacts the eastern portion of the site.
- Site allocation Policy PLP11 (**Port Solent**) outlines that all development proposals for this site must form part of a framework masterplan, alongside a site-wide design code to be agreed in writing by the Local Planning Authority.

7.8.4 In terms of non-strategic sites, it is considered that the wider draft Plan policies (explored under the next heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites manage the potential negative effects arising.

Commentary on city-wide policy provisions

7.8.5 Design is considered through the Plan, playing a key role in the delivery of policies across all ten objectives.

7.8.6 The focus of design is **Policy PLP1** (Design), which is in place to ensure that a high standard and quality of design and place-making that support beauty is achieved in the city. It sets out criteria which development proposals will be assessed against. This includes, but is not limited to, understanding and relating positively to local context, character and identify, and creating appropriate forms and types of development.

7.8.7 **Policy PLP49** (Public Realm) outlines that development proposals will be permitted where opportunities to enhance the public realm have been designed into the application. This is to ensure, amongst other things, that aspects of the public realm incorporate design of the highest quality, including landscaping, green and blue infrastructure, lighting, acoustics, street furniture, and surfaces.

7.8.8 With a focus on housing, **Policy PLP19** (Housing for Specific Groups) outlines that development proposals involving more than one self-build or custom-build on a site must be supported by a design framework that is

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submitted as part of the planning application. In addition, **Policy PLP23** (Estate Renewal) supports development proposals within the Council's estates provided that they deliver high quality design and sustainability, considering any relevant design guidelines or codes. Finally, **Policy PLP24** (Gypsies, Travellers & Travelling Showpeople) states that good design and landscaping should ensure that sites have adequate residential amenity and privacy for intended occupiers.

- 7.8.9 Regarding the historic environment, **Policy PLP55** (Conservation Areas) states that development in a conservation area will be permitted where a consistently high standard of design has been applied and good quality materials, especially those that are locally sourced and/or distinctive are proposed to be used.
- 7.8.10 **Policy PLP35** (Air Quality and Pollution) outlines that planning permission will be granted where development proposals demonstrate how health inequalities and the wider determinants of health and wellbeing have been incorporated into the design, layout and the use of the development, and its impact on the mental and physical health and wellbeing of occupiers.
- 7.8.11 **Policy PLP47** (Movement and Transport) states that the design and site layout of new development must protect the safety and amenity of all and give priority to the needs of pedestrians, cyclists, users of mobility aids and other non-motorised forms of transport. Movement through the site must be a safe, legible and attractive experience for all users, with roads and surfaces that contribute to the experience rather than dominate it. Design is also considered through **Policy PLP48** (Access and Parking).
- 7.8.12 **Policy PLP33** (Sustainable Construction and Onsite Renewable Energy) states that proposals will need to demonstrate consideration of all aspects of sustainable design and construction for the lifecycle of the development. Planning permission will be granted where proposals have certified against an independent assessment framework (or equivalent replacement scheme), or an alternative scheme.
- 7.8.13 More broadly, **Policy PLP2** (Climate Emergency) states that development proposals will be supported provide that they are designed to adapt and be resilient to the impacts of local climate change. In addition, **Policy PLP32** (Sustainable Drainage Systems) only permits development proposals where SuDS are sensitively located and designed to promote an enhanced landscape / townscape and good quality spaces that improve public amenity.
- 7.8.14 Also of relevance to this objective, **Policy PLP30** (Cultural and Visitor Economy) states that proposed development must be of an appropriate type, scale and design to complement and support the role of the existing centre or area and enhance its character.

Cumulative effects

- 7.8.15 The draft Plan recognises that high-quality design and masterplanning can support local, regional, and national climate change objectives. Good urban design can improve the sustainability performance of development (i.e. in terms of energy efficiency) while also improving accessibility to reduce the need to travel. On this basis, **minor positive cumulative effects** are considered likely.

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- 7.8.16 The Plan seeks to secure good urban design through strategic regeneration of key city locations, delivering enhancements to public realm, accessibility and the environmental quality of the area. Policy requirements seek to ensure development will support connectivity of active travel, green infrastructure and provide net gains in biodiversity, to deliver high quality urban living, working, and visiting environments. Whilst there remains an element of uncertainty in relation to potential growth outside of the city boundaries, within the city confines **minor long-term positive effects** are considered likely overall.

7.9 SA-9: Conserving and enhancing the natural environment in Portsmouth

Commentary on the spatial strategy

- 7.9.1 Portsmouth, despite its dense urban environment, benefits from a rich diversity of flora and fauna in its coastal, harbour and chalk grassland environments. It is the UK's only 'island city' and some 30% is covered by statutory nature conservation designations in recognition of its value to international, national and local biodiversity. The intertidal areas around Portsmouth, particularly the mudflats, shingle and saltmarsh provide ideal feeding and roosting grounds for overwintering bird species that are especially adapted to feeding in such habitats. The impacts of new development and construction can cumulatively disturb and pollute these environments, potentially affecting the health and key species and the quality of the water environment in the Solent.
- 7.9.2 The wider Solent area is generally regarded as a region of significant ecological value and sensitivity. Given the urban nature of southern Hampshire, an extensive evidence base relating to potential impact pathways has been developed. Furthermore, there are well-established issues (e.g. recreational disturbance and functionally linked habitat loss) for which strategic mitigation measures have already been developed.
- 7.9.3 The constraints associated with the strategic sites allocated through the draft Plan, alongside how site-specific policy seeks to positively impact the natural environment and address constraints, are outlined below:
- **Tipner West** and the adjacent Portsmouth Harbour are important for nature conservation, with the Harbour and the land south of the firing range designated as Portsmouth Harbour SPA, Ramsar site and SSSI. The former firing range is recognised as a primary support area (P60) for Brent geese. The delivery of sea defences together with site decontamination works at the site will protect the integrity of the nearby nature conservation sites and associated habitats from harmful leachate contamination and inundation from flooding. Policy PLP3 (Tipner West outlines that development proposals will be permitted provided that they:
 - Identify and incorporate opportunities to conserve, restore and recreate priority habitats and ecological networks.

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- Ensure new sea defence designs avoid or minimise loss of, or damage to SPA/Ramsar habitats having regard to the North Solent Shoreline Management Plan (2010) 'Hold the Line' policy (as may be amended) and associated compensation strategies and prioritise protection of the integrity of the international, national and local nature designations.
- Mitigate likely significant effects from recreational disturbance to protected bird populations through a bespoke developer-provided package of measures for the lifetime of the development, which will proportionally rely upon the Bird Aware Solent Revised Strategy together with site-specific and other measures, as advised by Natural England and identified through HRA; Provide for public access along the waterfront where feasible, connecting to coastal pathways at Tipner East and beyond without causing unmitigated recreational disturbance to protected bird populations.
- **Tipner East** is adjacent to Portsmouth Harbour SPA, Ramsar site and SSSI. It also contains BAP priority habitat mudflats and almost entirely overlaps Network Enhancement Zone 2 of the National Habitat Network. Regarding priority species for Countryside Stewardship targeting, the site overlaps priority areas for Countryside Stewardship measures addressing Lapwing and Redshank habitat issues. Part of the site is identified as a secondary support area (P139) for Brent geese. Policy PLP4 (Tipner East) outlines that development proposals will be permitted provided that they:
 - Provide for public access along the waterfront where feasible and without causing unmitigated recreational disturbance to protected bird populations; and
 - Provide appropriate compensation and mitigation measures to the satisfaction of the local planning authority and Natural England in regard to the Secondary Support Sites P136 and P139 of the Solent Waders and Brent Goose Strategy.
- **Lakeside North Harbour** is approximately 130m north of Portsmouth Harbour SPA, Ramsar site and SSSI, located on the other side of the M27. It also contains BAP priority habitat deciduous woodland and partially overlaps Network Enhancement Zone 2 and Network Expansion Zone of the National Habitat Network. Regarding priority species for CS targeting, the site overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. Part of the site is designated as a SINC and is partially within Candidate Site P138 of the Solent Waders and Brent Goose Strategy. Over 200 of the trees within the site are covered by individual Tree Preservation Orders (TPOs). Policy PLP5 (Lakeside North Harbour) outlines that development proposals will be permitted provided that:
 - Surveys are carried out to determine the classification of Candidate Site P138 of the Solent Waders and Brent Goose Strategy. Appropriate avoidance and mitigation measures to be provided to the satisfaction of the local planning authority and Natural England.
 - BNG of at least 20% is demonstrated as deliverable through the development and secured in perpetuity (at least 30 years) on site.

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- An Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan is submitted and implemented that protects trees throughout the site.
- **Portsmouth City Centre** is approximately 1.1km south of Portsmouth Harbour SPA, Ramsar site and SSSI. It contains BAP priority habitat deciduous woodland (Victoria Park). Regarding priority species for CS targeting, the site almost entirely overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. Policy PLP6 (Portsmouth City Centre) outlines that development proposals will be permitted provided that they:
 - Protect trees within the City Centre and take opportunities to plant more and provide enhanced greening.
 - BNG of at least 20% is demonstrated as deliverable through the development and secured in perpetuity (at least 30 years) at City Centre North.
- **Fratton Park & the Pompey Centre** is approximately 1.5km west of Solent Maritime SAC, Chichester and Langstone Harbours SPA and Ramsar site, and Langstone Harbour SSSI. Regarding priority species for CS targeting, the site almost entirely overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. Policy PLP7 (Fratton Park & the Pompey Centre) outlines that development proposals will be permitted provided that a network of interconnecting green and public access corridors are provided through the site, which will enhance the level of green infrastructure and secure net gains in biodiversity.
- **St James' & Langstone Campus** is adjacent to Chichester and Langstone Harbours SPA and Ramsar site, Solent Maritime SAC, and Langstone Harbour SSSI. It contains BAP priority habitat deciduous woodland and partially overlaps Network Enhancement Zones 1 and 2 and Restorable Habitat. Regarding priority species for CS targeting, the site almost entirely overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. The hospital grounds (St James) contain a large number of mature trees, including TPOs. Policy PLP8 (St James' & Langstone Campus) outlines that development proposals will be permitted provided that an Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan is submitted and implemented that protects trees throughout the site (St James). In addition, Policy PLP8 outlines that development proposals must provide appropriate mitigation for any direct recreational disturbance upon the adjacent Langstone and Chichester Harbour SPA, Solent Maritime SAC and any other nationally or locally designated habitat sites including supporting habitats.
- **Horsea Island Strategic Open Space** is adjacent to Portsmouth Harbour SPA, Ramsar site and SSSI. Regarding priority species for CS targeting, the site almost entirely overlaps priority areas for CS measures addressing Lapwing and Redshank habitat issues. Policy PLP9 (Horsea Island Strategic Open Space) outlines that that development proposals will be permitted provided that the open space provides for a mosaic of habitat that links to and supports the habitat of the neighbouring

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Portsmouth Harbour SPA and recognises the role of the site as core and primary supporting habitat for waders and Brent Geese. It contains BAP priority habitats deciduous woodland and lowland calcareous grassland and partially overlaps Network Enhancement Zone 2.

- 7.9.4 The Local Plan is supported by a Habitats Regulations Assessment (HRA)¹³, which seeks to identify any aspects of the emerging Portsmouth Local Plan that might cause Likely Significant Effects (LSEs) on, or adverse effects on the integrity of, Habitats sites. A key consideration for the latest update to the HRA (2025) is the revised proposal for Tipner West strategic site, given an adverse effect on the integrity of Habitat sites was previously identified in the HRA supporting the 2024 Pre-Submission Local Plan. The update to the HRA takes into consideration bespoke mitigation solutions alongside the updated Bird Aware Solent Recreation Mitigation Strategy (SRMS), and the context of the delivery of Horsea Island Strategic Open Space. The HRA now concludes that, with recommendations made and now included in the Plan, no elements of Portsmouth Local Plan will have an adverse effect on the integrity of any Habitats sites, either alone or in combination with other plans or projects. The SA corroborates this conclusion.
- 7.9.5 In terms of non-strategic sites, whilst the site-specific policies play a role, it is considered that the wider draft Plan policies (explored under the next heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites manage the potential negative effects arising.

Commentary on city-wide policy provisions

- 7.9.6 **Policy PLP36** (Coastal Zone) outlines that development proposals in the Coastal Zone will be permitted where they, amongst other considerations, seek opportunities to maintain and enhance access to the coast whilst minimising recreational disturbance to bird populations.
- 7.9.7 **Policy PLP38** (Green Infrastructure) outlines that major development will be permitted where it provides or contributes to green infrastructure, in line with the five key standards as set out in the Natural England Green Infrastructure Framework. The policy identifies a Green Grid and Green Corridors, which development should seek to conserve and enhance.
- 7.9.8 **Policy PLP39** (Biodiversity) outlines that development proposals will be permitted where they conserve and enhance biodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation. Up-to-date ecological information should be submitted which demonstrates that development proposals, amongst other considerations, retain, protect and enhance features of biodiversity interest and protect and support recovery of rare, notable and priority species. Policy PLP39 sets out a hierarchy of site designation, which will apply in the consideration of development proposals. Internationally protected SPAs, SACs and Ramsar sites are at the top of this hierarchy, followed by nationally protected SSSIs and NNRs; irreplaceable habitats (veteran and ancient trees); and finally locally protected LWSs, SINCs, SNCIs and LNRs.

¹³ AECOM (2025) Habitat Regulations Assessment of the Portsmouth Local Plan, Update for Local Plan Addendum

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- 7.9.9 Under **Policy PLP40** (Biodiversity Net Gain), development proposals will be permitted where they demonstrate at least a 10% net gain in biodiversity, accounted for in a biodiversity net gain plan. The policy highlights that development proposals should prioritise on-site BNG. In addition, development proposals within the strategic sites of Portsmouth City Centre and Lakeside, and the allocation site of Somers Orchard, which are all owned by the City Council, will need to demonstrate a 20% net gain in biodiversity accounted for in a biodiversity net gain plan.
- 7.9.10 **Policy PLP41** (Trees & Hedgerows) seeks to protect trees and hedgerows by ensuring that development proposals seek to retain on-site trees and hedgerows where possible, particularly those with TPOs. It also supports an increase in tree canopy cover in line with the Natural England Green Infrastructure Urban Tree Canopy Cover Standard. Specifically, tree canopy cover of at least 15% will need to be provided on new major development and lost trees should be replaced at a ratio of 1:1. Development proposals that would result in the loss or deterioration of ancient or veteran trees will only be allowed in exceptional circumstances.
- 7.9.11 **Policy PLP42** (Solent Waders and Brent Geese Sites) seeks to protect functionally linked sites, which are used by Solent Waders and/or Brent Geese, from adverse impacts commensurate to their status in the hierarchy of the Solent Wader and Brent Geese Network as outlined in the Solent Waders and Brent Goose Strategy. Proposals that impact these sites will need to provide mitigation as set out within the Solent Waders and Brent Goose Strategy.
- 7.9.12 **Policy PLP43** (Recreational Disturbance on International Nature Designations) states that planning permission for proposals resulting in a net increase in residential units will be permitted where a financial contribution is made towards the Solent Recreation Mitigation Strategy. In the absence of this, proposals will need to avoid or mitigate any in combination negative effects from recreation through a developer-provided package of measures for the lifetime of the development. Policy PLP43 also outlines that development should avoid noise disturbance impacts on birds at the SPA sites and/or at identified terrestrial SPA supporting habitat sites though the overwintering period.
- 7.9.13 Nutrient neutrality is addressed through **Policy PLP44** (Nutrient Neutrality in International Nature Designations). This policy permits development proposals where they demonstrate, through a nutrient budget, that they secure nutrient neutrality through either offsetting, provision of direct and indirect mitigation measures, purchase of mitigation credits, or a mixture of these.
- 7.9.14 More broadly, **Policy PLP51** (Electronic Communications and/or Utilities Infrastructure) seeks to ensure that development proposals for new electronic communications and/or utilities infrastructure minimises environmental impacts.

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Cumulative effects

- 7.9.15 The delivery of the Plan and its Development Strategy (notably strategic sites) will have cumulative effects for designated sites subject to wider growth pressures across the Solent. Notably, benefits are likely to emerge in relation to water quality and meeting WFD targets, as well as indirectly through increased resilience to climate change and flood risk across the sub-region in combination with other plans.

Conclusions

- 7.9.16 The HRA states that with the amendments recommended and now included in the Local Plan, it has been possible to conclude that no elements of Portsmouth Local Plan will have an adverse effect on the integrity of any Habitats sites, either alone or in combination with other plans or projects. The Plan therefore is considered to lead to broadly **neutral effects** overall, with policy provisions reinforcing HRA findings and securing mitigation interventions to protect sites from adverse effects. More broadly the Plan is merited for its strategy of city-wide greening and climate resilience, taking account of wider issues and opportunities affecting the PfSH sub-region.

7.10 SA-10: Facilitating the sustainable use of natural resources in Portsmouth

Commentary on the spatial strategy

- 7.10.1 In terms of land resources, the Plan recognises the role of the Hampshire Minerals and Waste Plan in enabling the delivery of sustainable minerals and waste development. Whilst the city contains safeguarded reserves of Brick Clay, Superficial Sand and Gravel and Soft Sand, these are largely limited to important reserves beneath areas of open space. The open space network is largely protected through the proposed spatial strategy and wider policies as discussed under the next heading.
- 7.10.2 The constraints associated with five of the seven strategic sites allocated through the draft Plan, alongside how site-specific policy seeks to address constraints, are outlined below:
- **Tipner West** is currently partly derelict and contains a number of unrelated land uses including a former Ministry of Defence firing range, boatyards, recycling, storage, and a special educational needs school, former Ordnance magazine and associated listed buildings. The site needs significant remediation to address historic polluting uses. Its redevelopment, as recognised in the City Deal, presents an opportunity to vastly improve the quality of the environment in this part of the city.
 - **Tipner East** has a long history of polluting land uses dating back to the 1860s. At the time of writing (2024) the remediation works were underway in line with the Construction Environmental Management Plan approved for planning application (10/00849/OUT). Policies PLP3 (Tipner West & Horsea Island East) and PLP4 (Tipner East) outline that development proposals for the separate sites will be permitted provided that they:

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- Deliver appropriate surface water and foul drainage infrastructure together with required nutrient neutrality and water usage mitigation measures to support the Environment Agency in achieving and/or maintaining at least 'good' water quality status and to protect designated habitats within the Portsmouth Harbour Waterbody; and
- Mitigate and remediate contamination from current and historic uses.
- **Lakeside North Harbour** was built on reclaimed land from the northern section of Portsmouth Harbour. Policy PLP5 (Lakeside North Harbour) outlines that development proposals will be permitted provided that evidence is provided of the current and historical contamination of the site and provision made for any necessary remediation to the satisfaction of the local planning authority.
- Policy PLP6 (**Portsmouth City Centre**) outlines that development proposals will be permitted provided that evidence is provided of the current and historical contamination of the site and provision made for any necessary remediation to the satisfaction of the local planning authority.
- **Horsea Island Strategic Open Space** is allocated for the development of a 64 hectare strategic public open space. Policy PLP9 (Horsea Island Strategic Open Space) outlines that that development proposals will be permitted provided that they take account of the approved plan for landscaping and maintenance of the former landfill site which impacts the eastern portion of the site.

7.10.3 In terms of non-strategic sites, whilst the site-specific policies play a role, it is considered that the city-wide draft Plan policies (explored under the next heading) will set the requirements for development, which are intrinsically linked to ensuring that these sites manage the potential negative effects arising.

Commentary on city-wide policy provisions

7.10.4 **Policy PLP1** (Design) requires that large-scale major developments should be supported by detailed masterplans or development frameworks and, where appropriate, design codes. Design considerations include the use of materials and their quality, sustainability, and durability, as well as materials in hard and soft landscaping and high-quality public and private spaces. Supported by **Policy PLP33** (Sustainable Construction and Onsite Renewable Energy) which requires that relevant proposals must demonstrate using a Sustainability Statement that all resources are used efficiently, as part of the construction and operation of a building, including consideration of embodied emissions.

7.10.5 **Policy PLP45** (Open Space) seeks to protect and enhance the open space network as well as accessibility to open space. The policy restricts the loss of existing space, whilst requiring new open space in significant development proposals. Development will be expected to create net gains in biodiversity through the requirements of **Policy PLP40** (Biodiversity Net Gain), and **Policy PLP38** (Green Infrastructure) outlines that major development will be permitted where it provides or contributes to green infrastructure, in line with the five key standards as set out in the Natural England Green Infrastructure Framework. Not only do the policies seek to retain and enhance the existing

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green infrastructure network, but in doing so also provide indirect support for the retention of the city's mineral resources.

- 7.10.6 The extension of appropriately located high-density areas (**Policy PLP21** (Residential Density)) will make more efficient and effective use of land, increasing accessibility in the urban centres. What is 'appropriate' will be determined in part by urban design principles that combine layout, form and scale in a way that responds positively to its context.
- 7.10.7 **Policy PLP37** (Contaminated Land) outlines that planning permission will only be granted for development on or near contaminated land, or where the presence of contamination is reasonably suspected, where appropriate and sufficient measures can be taken to remediate and/or satisfactorily mitigate the risk of contamination. Such measures must address the long-term safety of the proposed development, the end users of that development, and the natural environment and include the future management of the site.

Cumulative effects

- 7.10.8 Development within the city has the potential to cumulatively impact upon the wider water resource management zone, though joint working with Portsmouth Water and Southern Water is likely to ensure that water resource needs can be met throughout the plan period in line with the objectives and actions outlined through the Water Resource Management Plans.
- 7.10.9 With a focus on regeneration opportunities, and the premise for biodiversity net gain enhancing a strategic green infrastructure network that extends the city, **minor positive cumulative effects** are anticipated overall.

Conclusions

- 7.10.10 The spatial strategy prioritises significant regeneration opportunities alongside the retention of key natural resources that support the ecosystems and green infrastructure network of the city. The spatial strategy and policy provisions ensure long-term protection for existing open spaces, indirectly protecting the city's mineral resources. The additional policy support for high levels of efficiency in design and construction ensure long-term resource efficiency. As a result, **minor long-term positive effects** are concluded as likely.

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8. Conclusions and recommendations

8.1 Summary

8.1.1 Overall, the following conclusions are reached for each of the SA objectives:

SA objective	Plan appraisal conclusion
SA-1: Building a strong, competitive economy in Portsmouth	The spatial strategy and policy provisions of the draft Plan are considered for their potential to support the strategic objectives of the Plan to enable a strong and diverse economy that raises the quality of life and access to education and training opportunities for all. Overall significant positive effects are considered likely as a result.
SA-2: Ensuring the vitality of the City Centre and other town centres in Portsmouth	The detailed guidance and support provided for Portsmouth's centres, including growth at key locations, are considered to provide significant support for long-term vitality. As a result, significant positive effects are anticipated overall.
SA-3: Promoting sustainable transport in Portsmouth	Overall, the Plan seeks to deliver new infrastructure improvements and prioritises sustainable transport access, particularly active travel, in direct support of the strategy objectives for a healthy and happy city, a green city and a city with easy travel. The Plan also requires development to mitigate its impact on the strategic and local road network. As a relatively compact and accessible city, long-term minor positive effects are considered likely overall.
SA-4: To tackle climate change, flooding, and coastal change in Portsmouth	The strategic growth locations can support a good mix of uses within the city and lead to economies of scale to the benefit of climate resilience. Particularly by enabling the delivery of new or upgraded transport infrastructure, low carbon heat and power, flood resilience measures, and community infrastructure and open spaces, and positive effects are anticipated in this respect. Flood risk is a key constraint to growth in the city, and flood resilience in line with the proposed policy provisions will be key to ensuring that long-term adverse effects are avoided. However, as the plan strategy includes housing within high flood risk zones, minor negative effects are concluded.
SA-5: Delivering high-quality homes in Portsmouth	Overall, significant positive effects are concluded in relation to this objective, recognising that the Plan has put forward a viable housing strategy at this stage, though this will require continued monitoring and

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SA objective**Plan appraisal conclusion**

	partnership working to ensure longer-term housing needs can be planned for.
SA-6: Promoting healthy communities	On balance, it is appropriate to conclude that the draft Plan could lead to significant long-term positive effects in terms of promoting healthy communities within the city boundaries. Policies are coordinated to deliver positive health outcomes within the city, providing new homes, employment and community and transport infrastructure which prioritise healthy lifestyles, increase safety and reduce deprivation.
SA-7: Conserving and enhancing the historic townscape	Overall, the draft Plan policies seek to ensure that development retains and enhances the significance of the historic environment and heritage assets and their settings (including designated and non-designated sites). Encouraging the retention of historic heritage buildings and their reuse is anticipated to lead to minor positive effects, contributing towards meeting objectives not only within heritage protection and accessibility, but also in the related area of urban design and achieving a strong competitive economy. Protection is also provided to ensure that development appropriately considers archaeology as a prominent historic asset within the city. The policies are likely to reduce the extent of the negative effects identified; however, the overall impact remains uncertain at this stage as it is ultimately dependent on-site level schemes demonstrating successful design, layout, and integration.
SA-8: Requiring good urban design in Portsmouth	The Plan seeks to secure good urban design through strategic regeneration of key city locations, delivering enhancements to public realm, accessibility, and the environmental quality of the area. Policy requirements seek to ensure development will support connectivity of active travel, green infrastructure and provide net gains in biodiversity, to deliver high quality urban living, working, and visiting environments. Whilst there remains an element of uncertainty in relation to potential growth outside of the city boundaries, within the city confines minor long-term positive effects are considered likely overall.
SA-9: Conserving and enhancing the natural environment in Portsmouth	The HRA states that with the amendments recommended and now included in the Local Plan, it has been possible to conclude that no elements of Portsmouth Local Plan will have an adverse effect on the integrity of any Habitats sites, either alone or in combination with other plans or projects. The Plan therefore is considered to lead to broadly neutral effects overall, with policy

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SA objective**Plan appraisal conclusion**

	provisions reinforcing HRA findings and securing mitigation interventions to protect sites from adverse effects. More broadly the Plan is merited for its strategy of city-wide greening and climate resilience, taking account of wider issues and opportunities affecting the PfSH sub-region.
SA-10: Facilitating the sustainable use of natural resources in Portsmouth	The spatial strategy prioritises significant regeneration opportunities alongside the retention of key natural resources that support the ecosystems and green infrastructure network of the city. The spatial strategy and policy provisions ensure long-term protection for existing open spaces, indirectly protecting the city's mineral resources. The additional policy support for high levels of efficiency in design and construction ensure long-term resource efficiency. As a result, minor long-term positive effects are concluded as likely.
8.1.2	Broadly positive effects are identified overall, with many positive effects considered significant in nature. This is reflective of the development strategy's focus on thriving new homes and businesses, resilient and connected places, and protecting and enhancing Portsmouth's historic and natural environment.
8.1.3	The only negative effects concluded reflect the City's constrained nature in relation to flood risk, although residual effects are not considered to be significant in light of policy provisions. Broadly neutral effects are now concluded in relation to the natural environment given the policy for Tipner West can now (as per the updated HRA) be delivered without any adverse effects on international conservation designations that cannot be mitigated. The site will nonetheless require compensatory measures and continued monitoring.

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Part 3: What happens next?

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9. Next steps

9.1 Overview

- 9.1.1 The aim of Part 9 is to explain the next steps in the plan-making/ SA process and identify potential monitoring measures.

9.2 Next steps

- 9.2.1 This SA Report will be released alongside the Local Plan Addendum for a focused pre-submission consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 9.2.2 Following consultation, the Local Plan and this SA Report will be submitted to the Secretary of State who will appoint an Inspector or Inspectors to carry out an independent examination.

9.3 Monitoring

- 9.3.1 It is anticipated that monitoring will be undertaken as part of the Council's annual monitoring process, as reported through yearly Authority Monitoring Reports. Any additional monitoring requirements, if deemed necessary through the final plan-making stages, will be identified in the SA Adoption Statement (produced at the time of adoption of the plan).

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Appendices

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Appendix A - Regulatory requirements

As discussed in Chapter 1 of the main report, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. **Tables A, B & C** link the structure of this report to an interpretation of Schedule 2 requirements, and explains this interpretation.

Table A: Questions answered by the SA Report, in accordance with an interpretation of regulatory requirements

Report section	Questions answered	Regulatory requirement met
Introduction	What is the plan seeking to achieve?	An outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes.
	What is the scope of the SA?	- Relevant environmental protection objectives, established at international or national level. - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance. - Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. - The environmental characteristics of areas likely to be significantly affected. - Key environmental problems/ issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
Part 1	What has plan-making/ SA involved up to this point?	- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach). - The likely significant effects associated with alternatives. - Outline reasons for selecting the preferred approach in light of the alternatives assessment/ a description of how environmental objectives and considerations are reflected in the Plan.
Part 2	What are the SA findings at this current stage?	- The likely significant effects associated with the Plan. - The measures envisaged to prevent, reduce, and offset any significant adverse effects of implementing the Plan.
Part 3	What happens next?	A description of the monitoring measures envisaged.

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Table B: Questions answered by the SA Report, in accordance with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
1. an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
2. the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
3. the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
4. any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
5. the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
6. the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'baseline'?</i>
7. the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>
8. an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
9. a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

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Table C: 'Checklist' of how (throughout the SA process) and where regulatory requirements are or will be met.

Regulatory requirement	Discussion of how the requirement is met
Schedule 2 requirements:	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 2 ('What's the plan seeking to achieve') presents this information. The relationship with other plans and programmes is also set out in Appendix B (Scoping Information).
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report published in 2017. The outcome of scoping was an 'SA Framework', and this is presented within Chapter 3 ('What's the scope of the SA'). More detailed messages from the Scoping Report - i.e., messages established through context and baseline review - are presented within Appendix B. This also includes updates to scoping since the publication of the Scoping Report.
3. The environmental characteristics of areas likely to be significantly affected.	The Scoping Report (2017) presents a detailed review of the environmental characteristics of the study area, including baseline information on environmental, social, and economic factors, including but not exclusive to climate change, communities, and historic environment. This information ensures that potential significant effects are assessed in context, and that the baseline environment is appropriately assessed.
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	The Scoping Report (2017) and SA Framework identify existing environmental problems relevant to the plan area, including but not exclusive to air quality exceedances in designated AQMAs, waterbodies failing to meet Water Framework Directive objectives, areas at risk of flooding, and pressures on designated biodiversity sites (SPAs and SACs under Directives 79/409/EEC and 92/43/EEC) from factors such as habitat fragmentation, disturbance, and pollution. These issues have been taken into account in the assessment of reasonable alternatives and in developing appropriate mitigation measures.
5. The environmental protection objectives established at international, national, or community level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	The Scoping Report (2017) presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined to establish an 'SA framework'. The scoping information is presented in Appendix B and includes any relevant updates. The context review informed the development of the SA framework and topics, presented in Chapter 3, which provide a methodological 'framework' for appraisal. With regards to explaining "how... considerations have been taken into account" - - Chapter 5 explains how reasonable alternatives were established in-light of available evidence. - Chapter 6 sets out the summary findings of the appraisal of policy options. - Chapter 6 sets out the detailed appraisal of city-wide spatial options for housing and employment growth. - Chapter 7 explains the Council's 'reasons for supporting the preferred approach', i.e., explains how/ why the

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	preferred approach is justified in-light of alternatives appraisal (and other factors). Chapter 9 sets out the findings of the appraisal of the draft plan and Chapter 10 provides a summary of the findings and any recommendations.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between the above factors. (Footnote: these effects should include secondary, cumulative, synergistic, short-, medium-, and long-term, permanent and temporary, positive and negative effects).	- Chapter 5 explains how reasonable alternatives were established in-light of available evidence. - Chapter 6 sets out the summary findings of the appraisal of policy options. - Chapter 6 sets out the detailed appraisal of city-wide spatial options for housing and employment growth. - Chapter 9 sets out the findings of the appraisal of the draft plan and Chapter 10 provides a summary of the findings and any recommendations. As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/ dimensions.
7. The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Where necessary, mitigation measures are identified within the alternatives appraisal (in Chapter 3) and appraisal of the Draft Local Plan (Chapter 7) of this SA Addendum.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapter 5 deals with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues/ options. Also, Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in light of alternatives appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations/ assumptions are also discussed as part of appraisal narratives.
9. A description of the measures envisaged concerning monitoring in accordance with Article 10.	It is anticipated that monitoring measures will be detailed in the SA Adoption Statement.
10. A Non-Technical Summary of the information provided under the above headings.	A Non-Technical Summary (NTS) is provided separately.
The SA Report must be published alongside the Draft Plan, in accordance with the following regulations: Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying SA Report before the adoption of the plan or programme (Art. 6.1 and 6.2).	At the current time, this SA Report is being submitted for second Regulation 19 consultation.
The SA Report must be taken into account, alongside consultation responses, when finalising the Plan. The SA Report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6, and the results of	The Council have taken into account this SA Report and addendum, and consultation responses when preparing the Local Plan for submission.

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Regulatory requirement**Discussion of how the requirement is met**

any transboundary consultations entered into pursuant to Article 7, shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

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Appendix B – Scoping information

Scoping information for the assessment was first presented for consultation in the [2017 Scoping Report](#). Updates to the scoping baseline were subsequently summarised in Appendix B of the [Interim SA Report \(2021\)](#) and again in Appendix B of the [SA Report \(2024\)](#).

Scoping was undertaken in 2017, and a full baseline summary for each of the identified SA objectives is provided in the [Portsmouth City Council Sustainability Appraisal Scoping Report](#).

More recently, in December of 2024, the National Planning Policy Framework (NPPF) has been updated, and the publication of the UK Infrastructure Strategy have also been taken into account, ensuring that the latest iteration of the SA reflects current national policy and strategic priorities. Changes of significance are reported below.

[National Planning Policy Framework \(NPPF\)](#)

- Mandatory housing targets for principal authorities to drive housebuilding, with increased targets in areas facing the highest levels of unaffordability.
- Measures to ensure that principal authorities develop or update local plans that cater to the needs of their communities.
- Principal authorities must identify and prioritise lower-quality grey belt land to meet housing targets.
- New Rules for greenbelt development require developers to provide essential infrastructure for local communities, such as nurseries, GP surgeries, transportation, and a higher proportion of affordable housing.
- Increased emphasis on affordable housing.

The revisions confirm that strategic policies should optimise site selection and prioritise affordable housing and other essential infrastructure for local communities.

[UK Infrastructure: A 10 Year Strategy](#)

- Published in June 2025, sets out the government's plans to deliver government funding for infrastructure projects over the next decade. The report recognises the importance of community infrastructure alongside traditional infrastructure such as road and rail.

Further evidence provided by Portsmouth City Council.

- [Portsmouth City Council's Housing and Economic Land Availability Assessment \(HELAA\) Report \(2023\)](#) and the HELAA Update 2025
- [Portsmouth City Council's Climate Change Strategy \(2022\)](#)
- Housing and Economic Development Needs Assessment (HEDNA) (2023) and the HEDNA Update 2025

The updated scoping evidence does not materially change the key issues established for each theme, or the SA objectives and SA framework that continues to guide the SA. The key issues established through scoping are summarised below.

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SA-1: Building a strong, competitive economy in Portsmouth

The main issues are:

- A supply of land to establish fledgling businesses and grow the existing ones.
- Supporting a rise in GVA while also creating a more diverse employment market to create a balanced economy.
- Providing suitable water frontage sites to support the marine sector.
- Ensuring protection of land to provide a range of locations for new businesses, including small start-ups.
- Making provision for new facilities for the tourism and visitor economy as well as hotels and conference centres.
- Sixteen areas within the city are deprived and a stronger economy provides more opportunities to work.
- Supporting infrastructure is needed to support further growth in the city.

SA-2: Ensuring the vitality of the city centre and other town centres in Portsmouth

The main issues are:

- Ensuring the city centre achieves a mixture of retail, leisure, cultural and evening economy facilities.
- Seeing the city centre become a residential and office location to support its diversification.
- Adapting to compliment the role of internet shopping.
- Allowing Gunwharf to maintain its role for factory outlet retailing to complement the city centre.
- Supporting Southsea shopping centre.
- Reviewing and supporting the District and Local Centres in Portsmouth.
- Creating more office space in the city centre to support its regeneration.

SA-3: Promoting sustainable transport in Portsmouth

The main issues are:

- Encouraging a modal shift and public realm improvements including expansion of Park and Ride.
- Creating a walkable city where people take priority over the needs of the car.
- Tackling congestion and air pollution.

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- The need for a better and safer network of routes for cyclists and walkers to connect to jobs, homes and leisure facilities.
- Ensuring better access for the disabled to public transport.
- Problems with on-street car parking.

SA-4: To tackle climate change, flooding and coastal change in Portsmouth

The main issues are:

- Reducing greenhouses gases.
- Reducing flood risk to new and existing development.
- Balancing provision of new defences with the tourist and visitor appeal of the promenade and seafront.
- Balancing provision of new defences with the tourist and visitor appeal of the promenade and seafront.
- Avoiding coastal squeeze or creating new saltwater habitats to replace those lost where possible.
- Achieving high environmental standards on all new buildings, especially in the city centre.

SA-5: Delivering high-quality homes in Portsmouth

The main issues are:

- The housing shortage and the need for affordable, starter homes, provision of self-build plots and the private rented sector.
- Significant constraints in housing land supply.
- The need for more family homes, and providing dwellings with sufficient space for storage.
- Re-use of brownfield land and problems with decontamination affecting the viability.
- Housing for the disabled, the ageing population, young people, graduates and families.
- High concentrations of HMOs presenting a challenge to the future sustainability of many of our city's communities.

SA-6: To promote healthy communities

The main issues are:

- The high levels of deprivation and the prevalence of poor health and unemployment associated with it.
- Improving accessibility to surgeries.
- High levels of obesity and the need to get the population more active.
- To design out crime.

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- Energy efficiency and fuel poverty in the existing stock.
- The rising amount of dementia as the population ages, together with health care issues for the elderly.
- Ensuring access to good quality greenspace.

SA-7: Conserving and enhancing the historic townscape

The main issues are:

- Protecting and enhancing the historic environment and cultural townscape.
- Encouraging retention of the historic heritage buildings and their reuse.
- The careful siting of tall buildings in the context of placemaking.
- Will it provide for increased access to and understanding and enjoyment of the historic environment?

SA-8: Requiring good urban design in Portsmouth

The main issues are:

- To ensure higher and bespoke standards of design that provide high quality place making.
- To create a compact city with contemporary design and lifestyles.
- To create rooftop gardens and green roofs for biodiversity in the city centre.
- Creating connections that encourage walking and cycling and a modal shift.

SA-9: To conserve and enhance the natural environment in Portsmouth

The main issues are:

- Ensuring sufficient greenspace in Portsmouth to meet a range of needs from informal recreation to organised sports.
- Protect and enhance the Solent European Marine Sites.
- Protecting the Sites of Special Scientific Interest and improving them.
- Providing a network of Local Wildlife Sites (SINCs) to encourage biodiversity throughout the city.
- Mitigation and creation of Suitable Alternative Natural Greenspace (SANGs).
- Water quality in Portsmouth and Langstone Harbour.

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SA-10: Facilitating the sustainable use of natural resources in Portsmouth

The main issues are:

- To consider waste as a resource along other planning priorities.
- Support the ambition of a 'zero waste' economy for Portsmouth.
- Ensure sufficient WWTW capacity by keeping local facilities under review.
- The need to monitor the availability of the safeguarded land at HM Naval Base and commercial docks.
- Encourage the production of secondary and recycled aggregates.
- Ensure safeguarded mineral resources and minerals and waste infrastructure are protected from incompatible uses.

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Appendix C - Regulation 19 2024 consultation responses relating to the SA

The consultation responses directly related to the SA are provided below, along with an SA response.

Representation

SA Response

NHS Hampshire and Isle of Wight Integrated Care Board (ICB)

Whilst the NHS is not listed as a statutory body under the National Planning Policy Framework (NPPF), should the ongoing engagement between the Council and the ICB be included as part of The Partnership for South Hampshire? This is relevant as within the Duty to Cooperate Statement July 2024: SA-6: To promote healthy communities, specifically asks the question:

Noted, the SA merits the plan's focus on accessible development, but the conclusions at paragraph 9.66 has been extended to better reflect the capacity constraints.

Will it have/improve access to health and community facilities and other services?

Based upon the evidence provided by the ICB should there have been a response highlighting the shortage of primary care capacity?

Historic England

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

Options H2 and H4 involve maximising housing delivery. Given there are heritage sensitivities linked with all 6 sites identified in paragraph 5.57 of the SA, while it is not automatically the case that maximising delivery equates to increased likelihood of harm, an approach to assessment that picks up the likelihood of harm increases is surely possible and more useful than the uncertain outcome. This is broadly

The assessment of reasonable alternatives is essentially a 'policy-off' appraisal which recognises uncertainties relating to development proposals which are particularly influenced by policy (e.g. design principles) and resultant schemes. The overall conclusions for the plan as a whole (considering its policies) indicates likely minor positive effects, and no significant negative effects but still recognises that some uncertainty remains whilst specific site proposals are unknown and will ultimately influence the overall resultant effects (including the extent of expected minor negative effects) on the historic environment.

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Representation**SA Response**

concluded in paragraph 6.23 but the generic conclusions are less than ideal. We do not object to option 3 being the preferred option. However, paragraph 7.12 suggests that there will be significant negative effects from option H3, where surely the table on page 28 suggests an uncertain outcome.

The appraisal of reasonable alternative housing options indicates that “an increasing housing supply under the Options is considered to have the potential to increase risks for the historic environment – by means of more development, in more locations, potentially affecting more aspects of the baseline.”

The Council’s response to alternatives in paragraph 7.12 should be updated to better reflect the findings of the SA.

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

Noted, an update should be made to paragraph 6.50 to better reflect the sensitivities.

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

Thank you for highlighting errors in the summary table, this should be amended to reflect the SA findings as explained in the supporting narrative.

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

Noted, minor indirect effects are noted from biodiversity net gain that by extension could benefit the settings of heritage assets – no change required.

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

Noted, with thanks. No change required.

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Representation**SA Response**

encouragement to retain historic buildings and support their re-use.

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

This relates to the GIS analysis of sites and not the scoping information. This is a limitation of the GIS analysis of sites (which is a desk-based computer analysis) and the findings of this assessment are treated as early broad indicators for sites. Heritage expertise has been sought in relation to the more detailed findings within the SA, and heritage officers at PCC have reviewed the SA at each stage.

Friends of Old Portsmouth Association

Section 2.3: The sustainability objectives. These should apply to anywhere. It is unclear how these objectives will be met, or measured. Safe, quality housing is important to everyone not high-rise properties which are inherently dangerous and particularly unsuitable for the elderly or family life. Proper investment should be made, not chasing number targets, which will only result in the lowest quality, highest density solution, and hence a variety of problems for the future.

The sustainability objectives are created as objectives to guide the SA and form part of the method of assessment. Options and proposals in the Local Plan have been assessed against these objectives in the SA.

Comments noted with no change to the SA findings.

Where is the support to culture and heritage? Particularly for residents.

Cultural heritage is a consideration under the historic environment and the historic environment forms an individual SA theme given consideration throughout the SA. Culture is also encompassed under a range of socio-economic factors explored through the SA. No change required.

SA 2 why isn't Culture seen as a vitality element?

Culture is encompassed under a range of socio-economic factors explored through the SA. No change required.

SA 5 what about the older single, single parent and part-time parent groups?

This is encapsulated within the assessment criteria with a recognised need to provide homes to meet the

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Representation**SA Response**

	diverse housing needs of the city. No change required.
Section 5.22 A large number of tower blocks have been built to support the student population. What is their occupancy, are they full? From a public view, these blocks were approved on the assumption that this would release the student/shared houses back to the community for local needs. This doesn't seem to have happened and even more family houses are being converted to HMOs, with considerable detrimental impact on local neighbourhoods. The student tower blocks aren't suitable for anything but students and can't be easily re-designated to meet local needs. At least two of these blocks already seem to have to be re-clad, which can't be a good indication of the build quality or longevity and should provide lessons for future developments.	This section seeks to identify the locations that could meet the forecasted increased need for all types of new housing development, including growth in the student population. Comment is not directly related to the SA.
Table 5.1 it is unclear how the table of housing numbers relates to the housing need. Why all the student accommodation and HMOs if it is family homes that are needed? Where are properties suitable for the elderly, single parents, young couples, and increasingly, older singles?	The table outlines the supply forecast in relation to the estimated need. It does not drill down into detail around the specific types of housing that will be delivered at these locations, which would ultimately be influenced by local plan policies and local housing needs. No change required.
5.56 Not all these small/medium sites appear on the Brownfield Site map that was issued for the consultation.	These are not necessarily brownfield sites listed here, but small and medium sites that fall within Flood Risk Zones 2 and/ or 3. No change required.
7.45 onwards - Biodiversity / Off-setting once a site of scientific interest, biodiversity and so on is lost, it is lost. Trading offsets with other locations or other groups isn't a solution. Note earlier comment a 110m mature, mixed hedge, full of nesting birds, was ripped out. It has gone. Some poor, single species stock has been planted (at the second attempt), but is far from a suitable replacement, and is unlikely to be even 10 of 15 years hence.	Noted, Chapter 7 is PCC's response to the assessment of reasonable alternatives and paragraphs 7.45 to 7.50 relate to the Council's preferred approach for biodiversity net gain in development. No change required.
9.14 onwards City Wide Provisions PLP47 - Transport to these sites is	Transport and accessibility are discussed under SA-3 which identifies

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critical and missing. Details provided previously.

the merits and constraints associated with the strategic and non-strategic site allocations. No change required.

9.25 The Clean Air Zone implementation was weak, as there were so many exceptions. As Portsmouth is an island, there was opportunity to do so much more.

Noted, comment does not affect the SA findings.

9.28 What about the increased pressure on utilities? Water supply and waste water treatment? Portsmouth has an under-maintained sewage system (ref the uncontrolled CSO discharges, the closure of Pembroke Road and more recent Eastern Road closures and works). Where are the infrastructure works necessary to support all this proposed new development?

SA-10 explores the sustainable use of natural resources. No change required.

