

Sustainability Appraisal (SA) for the Portsmouth Local Plan

SA Submission Statement

February 2026

Quality information

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SA Submission Statement

- 1.1 AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Portsmouth Local Plan.
- 1.2 Following consultation on the Portsmouth Pre-Submission Local Plan Addendum 2025 and accompanying SA Report Update (supporting the Local Plan Addendum) 2025, this statement is produced to document and respond to the representations submitted through consultation, and to provide the monitoring framework.
- 1.3 This statement will be submitted alongside the Portsmouth Local Plan for examination in 2026.
- 1.4 Two representations were submitted that directly reference the SA. Having reviewed these representations, it is concluded that **no further changes** to the SA are required prior to submission.
- 1.5 **Table 1** below documents the two consultation responses that directly relate to the 2025 SA Report Update, along with an SA response.
- 1.6 **Table 2** identifies a monitoring framework for the Local Plan.

Table 1: Representations made in relation to the SA Report Update 2025

Representation	SA Response
NHS Hampshire and Isle of Wight Integrated Care Board (ICB) Dear Sir/Madam, NHS Hampshire and Isle of Wight Integrated Care Board (ICB) previously responded to the Regulation 19 Pre-Submission consultation in November 2024. Whilst this consultation is predominantly focused on the Tipner Peninsula and how it affects other elements of the proposed plan, we would like to re-state how critical it is that sustainable access to GP services are to the objectives set out in the Local Plan. As part of this consultation the Sustainability Appraisal (SA) for the Portsmouth Local Plan has also been reviewed, and while the SA provides a thorough appraisal of housing, employment, transport, and environmental considerations, we are concerned that primary healthcare capacity, particularly GP surgery provision, has not been adequately addressed and this omission is significant given the scale of growth proposed in the Local Plan.	Many thanks for your comments. We note the previous Local Plan response submitted by the ICB in 2024, as detailed in Appendix C (Regulation 19 2024 consultation responses relating to the SA) of the Portsmouth Local Plan Addendum SA Report Update 2025. The previous response sought to bring to our attention a shortage in primary care capacity affecting the city. The SA in response updated the overall conclusions in relation to SA-6: Promoting healthy communities, with Paragraph 7.6.11 summarising as follows: <i>“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.</i> <i>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 required supporting Health Impact Assessments in major development proposals.”</i>

Representation

The Plan identifies a housing target of 11,369 net additional homes during the plan period (2025–2040), with major strategic sites such as Tipner West, Tipner East, and Portsmouth City Centre expected to deliver substantial residential development. However, the SA does not assess the implications of this growth on primary care infrastructure, nor does it reference mitigation measures to address existing capacity constraints. We believe it critical that these major developments include specific reference to the inclusion of healthcare infrastructure to be delivered through developer contributions, as the practices that cover these strategic sites are already over capacity, and the new populations these developments will generate will not be mitigated through expansions to existing estate.

Current evidence indicates that Portsmouth already faces insufficient GP surgery capacity, with all practices, except for two surgeries, operating beyond their limits. Adding thousands of new homes without a clear strategy for expanding primary care provision risks exacerbating health inequalities and undermining the Plan's own strategic objective of creating "a healthy and happy city."

This concern is reinforced by the SA framework itself, which includes SA-6: To promote healthy communities, asking whether development will "improve access to health and community facilities and other services." Despite this, the appraisal does not meaningfully address GP provision or the cumulative impact of housing growth on healthcare services.

SA Response

Having sought to highlight this capacity constraint once brought to our attention, we further note the following points:

- As part of a proportionate approach, the SA does not undertake capacity assessments at specific community facilities but relies on such information being fed into assessments as available.
- Whilst a notable constraint, given capacity issues affect the whole city, the constraint is unlikely to affect the conclusions drawn in relation to reasonable alternatives, which focus on differentiating factors between the options under consideration.
- We do consider/ make the assumption that the proposed policy requirement for Health Impact Assessments in major developments will identify constraints at the settlement level and identify appropriate mitigation relative to: policy requirements, development viability, opportunities to expand provisions, and wider competing health factors (such as housing design and type, access to wider facilities including educational facilities, and opportunities to reduce inequalities).
- With a reliance placed on the assumption that Health Impact Assessments supporting major development proposals will identify appropriate mitigation, it is difficult to accurately assess the cumulative impacts, wider than assuming that project specific mitigation measures will seek to avoid significant effects arising and be scrutinised through the development management process accordingly.

Representation

Furthermore, the ICB has continued its engagement and on the 20th of November 2025 a letter was sent to the Assistant Director of Planning and Economic Growth setting out the existing lack of primary care infrastructure capacity and how, without appropriate mitigation, the situation will worsen.

We strongly recommend that the SA and Local Plan be updated to:

1. **Acknowledge the current shortfall in GP capacity across Portsmouth** and the potential impact of proposed housing growth.
2. **Assess the cumulative effect of new development on primary care services**, identifying risks to health outcomes.
3. **Set out mitigation measures**, such as
 - i. Requiring developer contributions for new or expanded GP facilities.
 - ii. Coordinating with NHS Hampshire & Isle of Wight Integrated Care Board (ICB) to align housing growth with health infrastructure planning.
 - iii. Including health infrastructure as a key component in site-specific policies for strategic sites.

SA Response

With these considerations in mind, no additional changes to the SA are proposed at this stage.

Without these considerations, the Plan risks failing to deliver sustainable communities and could face challenges at Examination regarding compliance with the National Planning Policy Framework (NPPF) requirement to plan positively for health and well-being.

We would welcome further engagement on this matter and look forward to working collaboratively to ensure that health infrastructure needs are fully integrated into the Local Plan.

Representation

SA Response

Portsmouth City Council Lead Local Flood Authority.

Please find below from Portsmouth City Council Lead Local Flood Authority (LLFA) [extracted point relating directly to the SA]:

SA-4 of Sustainability Assessment should include surface water and SuDS elements and how they can be used to tackle climate change and reduce flooding. And also SA-9 how SuDS can be used to enhance the natural environment e.g. raingardens / tree pits

Many thanks for your comments. We note that the appraisal of the draft plan provided in Chapter 7 of the Portsmouth Local Plan Addendum SA Report Update 2025 specifically seeks to identify and assess these points. Similarly, these are considerations within the assessment of reasonable alternatives. No additional changes required.

Table 2: Proposed monitoring framework

SA theme	Proposed monitoring measure (per annum)
SA-1: Building a strong, competitive economy in Portsmouth SA themes: Population Human Health	• Overall unemployment rate • Net additional employment floorspace • Identified quality improvements to existing employment floorspace • Annual tourism income • Net additional tourism development by location and type
SA-2: Ensuring the vitality of the city centre and other town centres in Portsmouth SA themes: Population Human Health Material Assets	• New retail units delivered • Retail units lost • Average individuals spend per visit
SA-3: Promoting sustainable transport in Portsmouth SA themes: Air Climatic Factors Human Health Population	• Road junction improvements • Improvements in accessibility scoring by location (walking and cycling) • Improvements in public transport networks • Additional km of Public Rights of Way • Changes in method of travel to work • Accessibility of public transport • Car parking provision

SA theme	Proposed monitoring measure (per annum)
SA-4: To tackle climate change, flooding and coastal change in Portsmouth SA themes: Population Human Health Climatic Factors Water Material Assets	• Proportion of properties at risk of flooding • Area of new development within flood zones 2 and 3 • % of developments including sustainable urban drainage systems or other measures to mitigate the impact of all sources of flooding • Reduction in per capita CO2 emissions • Carbon emissions per sector • % of new buildings with renewable energy systems installed • Installed capacity of renewable energy generating development
SA-5: Delivering high quality homes in Portsmouth SA themes: Population Human Health Material Assets	• Five-year housing land supply • Duty to Cooperate contributions to housing need • Number of new homes completed by type and bedroom size • Number of new specialist homes • Number of new self-build/ custom build homes completed • Number of affordable homes delivered by LSOA
SA-6: To promote healthy communities SA themes: Air Human Health Population	• AQMA declarations / revocations • Falling pollutant levels (identified through ASRs) • Improved key health indicators • Neighbourhood crime rate • Life expectancy • Healthy life expectancy • Access to education • Access to health facilities and services • Perceptions of safety and crime • Percentage of population being treated for mental health conditions
SA-7: Conserving and enhancing the historic townscape SA themes: Cultural Heritage Material Assets	• Number of heritage assets, areas and features on the latest Heritage at Risk Register • Review of the published Conservation Area Appraisals • Use of locally sourced materials

SA theme	Proposed monitoring measure (per annum)
SA-8: Requiring good urban design in Portsmouth SA themes: Human Health Material Assets	BREEAM standards in new developments
SA-9: Conserving and enhancing the natural environment in Portsmouth SA themes; Biodiversity Fauna Flora Material Assets Landscape Soil Water	- Percentage surface water bodies in 'High' or 'Good' ecological status - Percentage of new development on previously developed land - Area of contaminated land remediated - Loss of agricultural land by grade - Percentage of SSSI units which are in a favourable condition - Number and variety of priority species and habitats present - Percentage biodiversity net gain - Changes in the landscape characteristics of National Character Areas
SA-10: Facilitating the sustainable use of natural resources in Portsmouth SA themes: Human Health Climatic Factors Population Landscape	% of locally sourced materials used % of recycled materials used - Development of brownfield land - Development of greenfield land

