Portsmouth Local Plan

Submission Consultation Statement

Prepared in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) (as amended) Regulations 2012

March 2026

Portsmouth
CITY COUNCIL

Contents

Chapters		Page
1	Introduction	1
2	Local Plan Overview	3
3	Who the Council consulted on the emerging Portsmouth Local Plan and how they were consulted	6
4	Summary of main issues raised	10
5	How the representations were taken into account	11

Appendices

Appendix 1	Bodies and persons invited to make representations under each of the Local Plan consultations
Appendix 2	Summary of main issues raised pursuant to the Regulation 18 Portsmouth Local Plan 2038 and how they were taken into account in the Portsmouth Pre-Submission Local Plan 2024
Appendix 3	Summary of main issues raised on the Portsmouth Pre-Submission Local Plan 2024 pursuant to Regulation 20 and the Council's response
Appendix 4	Summary of main issues raised on the Portsmouth Pre-Submission Local Plan Addendum 2025 pursuant to Regulation 20 and the Council's response
Appendix 5	Statements of Common Ground

1. Introduction

1.1 The purpose of this document is to explain how Portsmouth City Council (PCC) has consulted on the preparation of the new Portsmouth Local Plan (PLP). It sets out how the Council has involved residents and key stakeholders in preparing the new PLP in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)[1] and the adopted Statement of Community Involvement[2]. It has been prepared to support the Submission of the PLP for examination. The PLP for submission comprises both the Portsmouth Pre-Submission Local Plan 2024 and the Portsmouth Pre-Submission Local Plan Addendum 2025.

1.2 Regulation 22 relates to the submission of documents and information to the Secretary of State and part c) requires a statement setting out the following:

(i) which bodies and persons the local planning authority invited to make representations under regulation 18;
(ii) how those bodies and persons were invited to make representations under regulation 18;
(iii) a summary of the main issues raised by the representations made pursuant to regulation 18;
(iv) how any representations made pursuant to regulation 18 have been taken into account;
(v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
(vi) if no representations were made in regulation 20, that no such representations were made.

1.3 This Consultation Statement starts with an overview of the preparation of the new PLP and references key documents relating to its preparation. It provides an overview of all stages of consultation, but focuses on the consultation on: the Regulation 18 Local Plan that took place in 2021, the first Regulation 19 Pre-Submission consultation that took place in 2024 on the Portsmouth Pre-Submission Local Plan 2024 and the second Regulation 19 Pre-Submission consultation that took place 2025-2026 on the Portsmouth Pre-Submission Local Plan Addendum 2025. It references the Summary of Responses documents prepared for each stage of consultation that has taken place (up to and including Regulation 18).

1.4 A full list of bodies and persons invited to make representations under Regulation 18 and Regulation 19 for each of the Local Plan consultations is provided in Appendix 1. The summary of the main issues raised in the Regulation 18 consultation on the Portsmouth Local Plan 2038 is set out in Appendix 2, along with an interim response for the Council's response before preparing the Regulation 19 Pre-Submission Local Plan 2024, followed by an explanation of how these representations were taken into

[1] https://www.legislation.gov.uk/uksi/2012/767/contents
[2] https://www.portsmouth.gov.uk/wp-content/uploads/2023/12/Draft-Statement-of-Community-Involvement-2023-aa-accessible.pdf

account in the Regulation 19 Local Plan 2024. It should be read alongside the Key Changes from Regulation 18 to 19 evidence based document[3]. It should be noted that in both Appendix 2 of this Consultation Statement, and the Key Changes from Regulation 18 to 19 evidence based document, the Regulation 19 document referred to is the Portsmouth Pre-Submission Local Plan 2024 and not the Portsmouth Pre-Submission Local Plan Addendum 2025. At the time these were originally prepared it was not envisaged that an addendum would be published.

1.5 The summary of the main issues raised in the first Regulation 19 consultation and the Council's response on the Portsmouth Pre-Submission Local Plan 2024 is set out in Appendix 3. The summary of the main issues raised in the second Regulation 19 consultation and the Council's response on the Portsmouth Pre-Submission Local Plan Addendum 2025 is set out in Appendix 4. Artificial Intelligence (AI) was used to aid analysis of representations on the Portsmouth Pre-Submission Local Plan Addendum 2025 (AI was not used for any previous stages of consultation), however, in preparing Appendix 4 of this document, the full representations were reviewed, not just the AI summaries.

1.6 Appendix 5 contains a list of statements of common ground which have been prepared in relation to the emerging Local Plan. The Council has taken a proactive approach to the preparation of statements of common ground, which has been a key part of the Council's response to addressing issues raised during the two Regulation 19 consultations. It has also been pre-emptive in helping to reduce the number of responses received on consultations, as statements of common ground have, in some cases, meant that certain parties felt no need to respond to some consultations. For this reason, statements of common ground are referred to in both Appendix 3 and Appendix 4 even when representations have not been made, where they have contained information relevant to particular parts of the emerging Local Plan.

1.7 Appendix 3 refers to statements of common ground which were relevant to the consultation on the Portsmouth Pre-Submission Local Plan 2024, some of which have since been superseded. Appendix 4 refers to statements of common ground which were relevant to the consultation on the Portsmouth Pre-Submission Local Plan Addendum 2025. Appendix 5 provides a list of all statements of common ground, including, where appropriate, noting where statements of common ground have been superseded.

[3] https://www.portsmouth.gov.uk/newlocalplanevidencedocbm

2. Local Plan Overview

2.1 The views and input of the local community and key stakeholders are vital to the City Council and there has been a considerable amount of public engagement on the Portsmouth Local Plan (PLP). This section sets out the various consultations that have taken place. At each stage all the responses were analysed and helped inform the Submission version of the PLP.

2.2 The Issues and Options[4] consultation ran between 3 August and 28 September 2017 and was the first stage in preparing the new Local Plan. It received comments from 363 respondents. It set out the Council's vision for the City's development, the issues facing the City and the Council's proposed approach or options to address them. The Summary of Responses[5] was published in November 2017. The responses were arranged into 28 chapters, covering the proposed Vision and Objectives, various themes, sites and broad areas, and the other documents, such as the Sustainability Appraisal and Habitats Regulations Assessment, which accompanied the consultation. The Summary of Responses included an initial officer response to the summary points. This was not intended to be the Council's final response to the subjects raised, but was included to help all parties understand how the work to be undertaken for the Local Plan would proceed. All the responses made to the Issues and Options consultation can be accessed on the Public Access[6] pages of the Council's website.

2.3 The Local Plan Evidence Base[7] was published for consultation from 11 February to 25 March 2019, receiving a total of 64 comments from 26 respondents. The purpose of this document was to summarise work which has been produced for the new Local Plan and seek the views of the public and other key stakeholders on the work contained in a number of evidence studies. The Summary of Responses[8] was published in July 2019 with a chapter of summaries for each of the twelve documents consulted on. The document set out an initial response to the topics raised. This did not represent Council's final view, but indicated how further work would be undertaken for the new Local Plan and how consultation comments influenced the development of the Plan. All the responses made to the Local Plan Evidence Base consultation can be accessed on the Public Access[9] pages of the Council's website.

2.4 The consultation on the Tipner Strategic Development Area[10] also ran from 11 February to 25 March 2019. A total of 344 comments were received from 165 respondents. The purpose of the document was to set out the Council's thinking in relation to the various options for Tipner and to identify where further work was

[4] https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Issues-and-Options.pdf
[5] https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Portsmouth-Local-Plan-summary-of-responses.pdf
[6] https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/new-local-plan-evidence/
[7] https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Update.pdf
[8] https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Evidence-Consultation-Summary.pdf
[9] https://publicaccess.portsmouth.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=PZ5W9XMO0LX00
[10] https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Tipner-Strategic-Development-Area.pdf

required to complete the Local Planning Authority's evidence base. It was the first stage in the process of establishing the most appropriate site boundary and land uses for the area. The City Council identified the site as a potential strategic location to help meet the City's current and long term housing and employment needs. The document included a Strategy Plan and the option of a super peninsula by reclaiming land from Portsmouth Harbour. The City Council recognised the presence of sensitive internationally important environmental assets and other considerations including flood defences, the Harbour School, Grade II listed structures and the potential for a bridge linking Tipner with Horsea. The Summary of Responses[11] was published in July 2019 and included a chapter on each of the consultation questions. The document set out an initial response to the representations made on each question. Whilst this did not represent the Council's final view, it indicated how further work was intended to proceed at the time and how consultation comments influenced the development of proposals for Tipner. All the responses made to the Tipner Strategic Development Area consultation can be accessed on the Public Access[12] pages of the Council's website.

2.5 The Regulation 18 consultation on the Portsmouth Plan 2038[13] ran from 17 September to 31 October 2021. The Regulation 18 Plan included a full suite of policies for the City and asked a number of questions to guide policy formulation. Three options were set out for Tipner as follows: an innovative sustainable community; regeneration of the existing area; and maintain (no strategic development at Tipner West). The consultation resulted in thousands of comments from residents, stakeholders and interested parties. A total of 410 individual responses were submitted to the virtual room (6,016 comments) and 71 email responses. In addition, the Council received 8,995 proforma petition comments, coordinated by the Hampshire & Isle of Wight Wildlife Trust (HIOWWT) and the Royal Society for the Protection of Birds (RSPB) objecting to development at Tipner. The Summary of Responses was published in February 2022[14]. The report summarised all the responses to all the questions and policies. It also set out an initial Council response. The report RAG rated (rated red, amber or green) all the policies. Green indicated that the policy would remain largely unchanged, amber indicated that the policy required some amendments to take account of consultation comments and red indicated that the policy direction required more substantial change. Policy S2 on Tipner was the only red rated policy.

2.6 The Regulation 19 consultation on the PLP 2024 ran for eight weeks from 9 July 2024 to 3 September 2024. The Pre-Submission Local Plan 2024 is one of the documents which the City Council intends to submit for examination, and will form part of the submitted Local Plan. It includes a full suite of policies for the City including core policies, strategic sites, allocations and City-wide both strategic and development management policies.

[11] https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Tipner-and-Horsea-Island-Consultation-Summary.pdf
[12] https://publicaccess.portsmouth.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=PZ7CZ7MO0LX00
[13] https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/207.9-Local-plan-2021-document-FULL-ACCESSIBLE.pdf
[14] https://democracy.portsmouth.gov.uk/documents/s37180/Appendix%201%20Draft%20Reg%2018%20consultation%20response%20summary%20report%20v2.pdf

2.7 A total of 6,571 representors submitted representations on the Pre-Submission Local Plan 2024 of which 6,415 used a proforma. This was produced by the HIOWWT and the RSPB, as part of their 'Don't Cross the Line'[15] campaign objecting to the Tipner West & Horsea Island East allocation. As the proforma representations submitted as part of the HIWWT and RSPB campaign were standardised, the Council refers to these as "standard" representations, all other representations are referred to as "non-standard". A total of 152 representors submitted comments which were nonstandard and 4 representors submitted both standard Tipner representations alongside comments on other aspects of the plan. Most representors made multiple representations on the Plan. A total of 33,241 representations were received on the Pre-Submission Local Plan 2024: 32,574 were standard Tipner representations and 667 representations were on other aspects of the Plan/non-standard Tipner representations.

2.8 A total of 126 representors withdrew their representations on the Pre-Submission Local Plan 2024 in 2025/26 when they were contacted regarding the consultation on the Pre-Submission Local Plan Addendum 2025. This equated to 636 representations. These were all standard Tipner representations submitted via the HIWWT and RSPB 'Don't Cross the Line' campaign.

2.9 The Regulation 19 consultation on the PLP Addendum 2025 ran for just over seven weeks from 18 November 2024 to 8 January 2025. The Pre-Submission Local Plan Addendum 2025 is one of the documents which, together with the Pre-Submission Local Plan 2024, the City Council intends to submit for examination, and will form part of the submitted Local Plan. The Pre-Submission Local Plan Addendum 2025 includes a few select policies which will replace policies previously proposed in the Pre-Submission Local Plan 2024.

2.10 A total of 28 representors submitted representations on the Pre-Submission Local Plan Addendum 2025. A total of 76 representations were received on the Pre-Submission Local Plan Addendum 2025. In addition to the above, a total of 5 representors submitted representations which were not duly made (they related to matters or policies not contained within the Pre-Submission Local Plan Addendum 2025).

2.11 There have also been a number of bespoke consultations on specific aspects of the Local Plan such as the Infrastructure Delivery Plan, which have also informed the Pre-Submission Local Plan 2024 and Pre-Submission Local Plan Addendum 2025 and their supporting documents.

2.12 The Key Changes from Regulation 18 to 19 evidence based document was produced to support the publication of the Pre-Submission Local Plan 2024 for consultation. It provides a clear audit trail between the two versions of the PLP. It contains the following three tables:

(i) Key changes to draft Policies of the Regulation 18 Local Plan and relevant policies in the Regulation 19 Local Plan;
(ii) New policies in the Regulation 19 Local Plan;
(iii) Policies that were not carried forward to the Regulation 19 Local Plan.

[15] https://action.wildlifetrusts.org/page/153365/action/1

3. Who the City Council consulted on the emerging Portsmouth Local Plan and how they were consulted

3.1 There have been six formal consultations on the emerging Portsmouth Local Plan (PLP). Details of the bodies and persons invited to make representations under Regulations 18 and 19 for each of the consultations are set out in Appendix 1 of this document. Details of how they were consulted is set out below.

Issues & Options (2017)

3.2 As part of the Issues & Options consultation, all relevant stakeholders and statutory consultees were invited to make representations. A trial run of the consultation was delivered to all addresses in the City via the summer edition of the Flagship Magazine[16]. At the time of the actual consultation the City Council notified all consultees on the Planning Policy Consultation Database via email or letter with details on the consultation including how long it would run for and how to respond. PCC also wrote to Statutory Agencies and neighbouring authorities inviting them to respond to the consultation.

3.3 The consultation ran for a period of eight weeks from 03 August to 28 September 2017. All documents were made available on the Council's website. Paper copies of the documents were available to view at the local libraries, community centres and at the Civic Offices.

3.4 In order to raise local awareness the following actions were taken: an advert was placed in the Portsmouth News and a press release issued; details were published on PCC's social media accounts; the Citizens' Panel was used; two workshops were held (one for the business community and one for community groups) and staffed exhibitions were held in Cosham, Milton, Southsea, North End and Portsea.

3.5 Respondents were asked to complete an online questionnaire or submit a formal response form to be returned via email to planningpolicy@portmsouthcc.gov.uk or returned by post to the Civic Offices.

Local Plan Evidence Base (2019)

3.6 As part of the Evidence Base Update consultation, specific contact was made with key organisations, such as neighbouring authorities and environmental groups. Emails and letters were sent to over 500 organisations and individuals who had expressed an interest in the Local Plan.

3.7 The consultation period ran for a period of six weeks from 11 February to 25 March 2019. All documents were made available on the Council's website. Paper copies of the consultation document and supporting documents were available to view at the

[16] https://www.portsmouth.gov.uk/wp-content/uploads/2020/04/flagship-summer-2017.pdf

local libraries, community centres and at the Civic Offices. The main consultation document was made available at community centres and housing offices.

3.8 Respondents were asked to complete an online questionnaire or submit a formal response form to be returned via email to planning policy@portmsouthcc.gov.uk or returned by post to the Civic Offices.

Tipner Strategic Development Area (2019)

3.9 As part of the Tipner Strategic Development Area consultation, specific contact was made with key organisations, such as neighbouring authorities and environmental groups. Emails and letters were sent to over 500 organisations and individuals who had expressed an interest in the Local Plan. In addition to this, Tipner received considerable media coverage.

3.10 The consultation ran for a period of six weeks from 11 February to 25 March 2019. All documents were made available on the Council's website. Paper copies of the consultation document and supporting documents were available to view at the local libraries, community centres and at the Civic Offices. The main consultation document was made available at community centres and housing offices.

3.11 In order to explain the consultation document, two exhibitions were held close to the Tipner and Horsea areas. These took place at the Mountbatten Centre on 27 February from 2pm - 8pm and at Port Solent Boardwalk on 09 March from 12pm - 4 pm. In addition, PCC published information of the consultation on their social media pages and directly contacted the Action Portsmouth, Shaping Portsmouth and Portsmouth Together networks.

Portsmouth Plan 2038 Regulation 18 (2021)

3.12 The City Council notified all specific consultation bodies, general consultation bodies and people who had raised an interest in the proposed Local Plan on their consultation database. Letters were sent out by post where there was no email provided. Copies of Local Plan leaflets were posted to all households within Portsmouth's administrative boundary and additional copies were delivered to community centres and libraries across the City. The consultation was promoted on PCC's social media accounts.

3.13 All documents for the public consultation were published online on PCC's website between 17 September and 31 October 2021. Paper copies of the consultation documents were also made available at the Civic Offices and public libraries.

3.14 Three in person consultation events were held on the 16, 19 and 20 October in Cosham Library, Pompey in the Community at Fratton Park and the Central Library respectively. These drop-in events ran for approximately four to five hours, and display posters were exhibited with key headlines from the Plan. At these drop-in events, those who attended were provided with the option of filling out paper copies of response forms rather than responding online.

3.15 A virtual room with display posters was set up online in addition to in-person events. Respondents could provide comments via the virtual room, email or letter (sent to the Civic Offices) with all responses requiring to be written. The consultation document and the virtual room posed a series of 47 questions relating to each policy within the Regulation 18 Local Plan. These questions were designed to ascertain whether stakeholders and respondents agreed with the proposed approach and whether there were any further comments on each policy area.

Portsmouth Pre-Submission Local Plan (2024)

3.16 The City Council notified all specific consultation bodies, general consultation bodies and people who had raised an interest in the emerging Local Plan on the consultation database. Letters were sent out by post where there was no email address provided. The consultation was promoted on PCC's social media accounts.

3.17 The Statement of Representations Procedure & Availability of Proposed Submission Documents for Inspection[17] set out the detail of how to make a representation on the Pre-Submission Local Plan 2024 and where to view documents.

3.18 Paper copies of the Pre-Submission Local Plan 2024 and proposed submission documents (Policies Map, Sustainability Appraisal, Habitat Regulations Assessment and Consultation Statement) were available for inspection at the Civic Offices and Central, Cosham, Carnegie and Southsea Libraries. Leaflets and posters advertising the consultation were placed in all the community centres and libraries in the City. The information boards from the consultation events were in the foyer of the Civic Offices for the duration of the consultation once the events had taken place.

3.19 Two in person consultation events were held on Saturday 13 July 2024 in Cosham Library and on Tuesday 16 July 2024 at the Central Library. These drop-in events ran for approximately three hours and displayed information boards with key headlines from the Plan. People who attended these drop-in events could talk to officers about the Plan and were provided with the option of filling out paper copies of response forms rather than responding online.

Portsmouth Pre-Submission Local Plan Addendum (2025)

3.20 The City Council notified all specific consultation bodies, general consultation bodies and people who had raised an interest in the emerging Local Plan on the consultation database. Letters were set out by post where there was no email address provided. The consultation was promoted on PCC's social media accounts.

3.21 The Statement of Representations Procedure & Availability of Proposed Submission Documents for Inspection 2025[18] set out the detail of how to make a representation on the Pre-Submission Local Plan Addendum 2025 and where to view documents.

[17] https://www.portsmouth.gov.uk/wp-content/uploads/2024/06/FINAL_Statement_of_Representation_Procedure_Availability.pdf

[18] https://www.portsmouth.gov.uk/wp-content/uploads/2025/11/Statement-of-Representations-Procedure-Statement-of-Fact-PLP-Addendum.pdf

3.22 Paper copies of the Pre-Submission Local Plan Addendum 2025 and proposed submission documents (Policies Map, Sustainability Appraisal, Habitat Regulations Assessment and Consultation Statement) were available for inspection at the Civic Offices and Central, Cosham, Carnegie and Southsea Libraries. Leaflets and posters advertising the consultation were placed in all the community centres and libraries in the City. The information boards from the consultation event were in the foyer of the Civic Offices for the duration of the consultation once the event had taken place.

3.23 One in-person consultation event was held on Tuesday 02 December in the Mountbatten Centre. This drop-in event ran for approximately five hours and displayed information boards with key headlines from the Plan. People who attended these drop-in events could talk to officers about the Plan and were provided with the option of filling out paper copies of response forms rather than responding online.

4. Summary of main issues raised

4.1 A summary of the main issues raised was prepared for each of the Regulation 18 consultations on the emerging Local Plan. Links to these summaries were provided in chapter 2 of this document and are provided again below for convenience:

- Summary of Responses[19] for the Issues & Options was published in November 2017
- Summary of Responses[20] for the Local Plan Evidence Base was published in July 2019
- Summary of Responses[21] for Tipner Strategic Development Area was published in July 2019
- Summary of responses[22] for the Regulation 18 consultation on the Portsmouth Plan 2038 was published in February 2022

4.2 A summary of the main issues raised in the representations relating to the Pre-Submission Local Plan 2024 under Regulation 20 is set out in Appendix 3.

4.3 A summary of the main issues raised in the representations relating to the Pre-Submission Local Plan Addendum 2025 under Regulation 20 is set out in Appendix 4.

[19] https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Portsmouth-Local-Plan-summary-of-responses.pdf
[20] https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Local-Plan-Evidence-Consultation-Summary.pdf
[21] https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/Tipner-and-Horsea-Island-Consultation-Summary.pdf
[22] https://democracy.portsmouth.gov.uk/documents/s37180/Appendix%201%20Draft%20Reg%2018%20consultation%20response%20summary%20report%20v2.pdf

5. How the representations were taken into account

5.1 The Summaries of Responses for each of the four Regulation 18 consultations on the emerging Local Plan included an initial officer response to the summary points. These were not intended to be the Council's final response to the subjects raised, but were included to help all parties understand how the work to be undertaken for the Local Plan would proceed.

5.2 The summary of the main issues raised in the Regulation 18 consultation on the Portsmouth Local Plan 2038 is set out in full in Appendix 2 of this document. The initial Council response from 2022 is set out and then it is explained how these representations have been taken into account in the Regulation 19 Pre-Submission Local Plan 2024. It should be read alongside the Key Changes from Regulation 18 to 19 evidence base document.

5.3 The summary of the main issues raised in each of the two Regulation 19 consultations on the emerging Local Plan includes a Council response to the summary points. Although this is not specifically required by the Regulations, these have been provided to aid any potential Inspector in examining the Local Plan. Copies of all the representations received under regulation 20 will be submitted for examination along with the other submission documents.

Appendix 1: Bodies and persons invited to make representations under each of the Local Plan consultations

The following bodies and persons were invited by Portsmouth City Council to make representations on the following consultations:

Issues & Options (2017)

Bodies:

Adams Hendry Consulting Ltd
Age Concern (Portsmouth)
Alliance Environment & Planning Ltd
Ancasta Port Solent
Arcus Consultancy Services Ltd
BAE Systems
Barton Willmore
Beverston Road Residents' Group
Biffa Waste Services Ltd
Blake Lapthorn
Blue Cedar Homes
BNP Pariba Real Estate
Bramsdon & Childs
British Property Federation
British Telecommunications plc
Brittany Ferries (BAI) UK Ltd.
Broadway Malyan
Bryan Jezeph Consultancy
Buckland Community Board
Butterfly Conservation - Portsmouth Area Branch
Campaign for the Protection of Rural England (CPRE)
Cascades Shopping Centre
Centros Portsmouth Limited Partnership
Chris Thomas Ltd.
CL Planning
Cluttons LLP
Community Action Portsmouth
Coronation House Residents' Association
Costco Wholesale UK Ltd
CSJ Planning Consultants Ltd
Cushman & Wakefield
Cyclist Touring Club
David L Walker Chartered Surveyors
David Richmond and Partners
Davis Langdon
Dean Lewis Estates
Deer Park Alpha & South Coast Design Forum
Defence Infrastructure Organisation
Deloitte LLP
Deloitte Real Estate
Dockyard Association
Drayton & Farlington Action Group
Drayton Centre Portsmouth
DSTL
East Hampshire District Council
Education & Skills Funding Agency
Environment Agency Southern
Fareham Borough Council
Fields In Trust
First Hampshire & Dorset Ltd
First Wessex Housing Group
Firstplan
Fratton Bridge Garage
Fratton Park Area Residents' Association
Friends of Old Portsmouth Association
Friends of Portsdown
Friends of the Earth (Portsmouth)
Friends, Families and Traveller Law Reform Project
G L Hearn
Gerald Eve Surveyors
Gleeson Strategic Land
Goadsby and Harding Commercial Ltd
Gosport Borough Council
Gosport Ferry Ltd
Greater Portsmouth Hoteliers' Association
Greater Sylhet District Association, South East Region
Green Space South East
Gregory Gray Associates
Hallam Land Management Limited
Hampshire and Isle of Wight Local Nature Partnership

Hampshire and Isle of Wight Sustainable Business Partnership
Hampshire and Isle of Wight Wildlife Trust
Hampshire Bat Group
Hampshire Buildings Preservation Trust
Hampshire Chamber of Commerce and Industry
Hampshire Constabulary
Hampshire County Council
Hampshire Fire and Rescue Service
Hampshire Playing Fields Association
Hampshire Police
Harris Lamb property consultancy
Havant Borough Council
Health and Safety Executive (HSE)
Heartlands Community Voice
Highways Agency
Historic England
Home Builders Federation
Homes and Communities Agency (HCA)
Hovertravel Ltd
HRPG
I Shop Local
Isle of Wight Council
Jonathan Wood Associates Ltd
Jones Lang Lasalle
King James Quay Management
Kirkwells town planning and sustainable development consultants
Knight Frank
Lambert Smith Hampton
Land Securities
Landport Community Board
Langstone Harbour Board
LaSalle Investment Management
Leith Planning
Les Weymes Planning Consultancy
Levvel Consulting Ltd
Lingfield Court Residents' Association
Local Dialogue
London Clancy
Luken Beck Ltd
Marine Management Organisation
Martin Grant Homes Ltd.
Mayfair Investments
McKinlay & Co Ltd
Milton Neighbourhood Planning Forum
Montagu Evans
Montagu Land Ltd
MyPool Ltd
National Car Parks Ltd
National Grid
National HMO Lobby
National Landlords Association
National Landlords Association (Portsmouth)
Natural England
Neighbourhood Forums
Nesbits Estate Agents
Net Fishermans Association
Network Rail Infrastructure Ltd
New Forest District Council
NHS Property Services
Northwood (Lakeside)
Orchard Street Investment Management
Oyster Quay Management Limited
Partnership for Urban South Hampshire (PUSH)
PATCH
Paulsgrove and Wymering Community Board (PAWCAB)
Peacock & Smith
Persimmon Homes South East
Planning Development Regeneration (PDR)
Planning Issues (Churchill Retirement Living)
Planning Prospects
Planware Ltd
PLC Architects
Police Crime Commissioner for Hampshire
Pompey Supporters Trust
Port Solent Bertholders Association
Port Solent Community Working Party
Port Solent Yacht Club
Portchester Planning Consultancy
Portchester Society
Portsbridge Utility Association
Portsea Action Group (PAG)
Portsmouth and District Private Landlords Association
Portsmouth and Langstone Sailing Association
Portsmouth and South East Hampshire Partnership
Portsmouth Cathedral

Portsmouth City Council Equalities Service
Portsmouth Climate Action Network
Portsmouth Clinical Commissioning Group
Portsmouth College
Portsmouth Commercial Port
Portsmouth Cultural Trust
Portsmouth Cycle Forum
Portsmouth Diocese
Portsmouth Disability Forum
Portsmouth Harbour Conservation Group
Portsmouth Harbour Cruising Club
Portsmouth Hospitals NHS Trust
Portsmouth Housing Partnership
Portsmouth Naval Base Property Trust
Portsmouth Publishing & Printing Limited
Portsmouth Racial Equality Network Organisation (PRENO)
Portsmouth Ramblers
Portsmouth Society
Portsmouth Supporters Trust
Portsmouth Water Ltd.
POSOL (Port Solent Residents Management Company Limited)
PREIM Ltd (Hilsea Parson Close Residents Company Ltd)
Premier Marinas Limited
Pure Town Planning
QinetiQ
Quadrant Estates
Queen's Harbour Master Portsmouth
Quod
Railway Pension Funds
Railway Pension Funds
Rapleys LLP
Residential Landlords Association
Residents Association of Port Solent (RAPS)
Resident's Management Committee
RHB Partnership LLP
Royal Mail Group
Royal Society for the Protection of Birds (RSPB)
Safer Portsmouth Partnership
Savills
Scotia Gas Networks
Scottish and Southern Energy Plc
Sellar Properties (Stadium Developments) Limited, c/o Cushman & Wakefield
Shaping Portsmouth Development Group
Showman's Guild of Great Britain
Sirius House Residents Association
Sirius Planning
Solent Protection Society
Somerstown Community Board
South Coast Design Forum
South West Trains
Southampton City Council
Southern Co-operative Ltd
Southern Electric
Southern Water
Southwick and Widley Parish Council
Spice Island Association
Sport England
SSA Planning Limited
Stagecoach - Portsmouth
Stagecoach South
Stamshaw and Tipner Residents Forum
Stewart Ross Associates
Sustrans
Tabacon.co.uk
Terence O'Rourke Plc
Tetlow King
The Campaign for Real Ale
The Children's Trust
The Coal Authority
The Environment Centre
The Kings Theatre Trust Ltd.
The National Federation of Gypsy Liaison Groups
The National Romani Rights Association
The New Theatre Royal
The Theatres Trust
The Woodland Trust
Tipner Regeneration Co. Ltd
Tourism South East
Town Centes / Trader's Associations
Trafalgar Wharf Ltd
Traveller Law Reform Project
Turley
Tutton Town Planning Consultants Ltd
University of Portsmouth
University of Portsmouth Student Union
Urban DNA
Vail Williams

Voluntary Sector Support c/o Portsmouth
City Council
We Will Check It
White Young Green Planning
Wightlink Isle of Wight Ferries Ltd.
Winchester City Council
Woolf Bond Planning
Youth Parliament

Persons:

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Janice Loose
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Jerry Bamforth
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June Wilson
Keith Ryall
Ken Wise
Kevin Farrar
Linda Page
Sati Panesar
Terry Carter
Tony Charles
S.G. Lloyd
William Thornton

Local Plan Evidence Base (2019)

Bodies:

Adams Hendry Consulting Ltd
Age Concern (Portsmouth)
Alder King
Alliance Environment & Planning Ltd
Ancasta Port Solent
Arcus Consultancy Services Ltd
BAE Systems
Barton Willmore
Beverston Road Residents' Group
Blue Cedar Homes
BNP Paribas Real Estate UK
Bramsdon & Childs
British Property Federation
British Telecommunications plc
Brittany Ferries (BAI) UK Ltd.
Broadway Malyan
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Buckland Community Board
Butterfly Conservation - Portsmouth Area Branch
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Cascades Shopping Centre
CBRE Ltd.
Centros Portsmouth Limited Partnership
Chapman Lily Planning Limited
Chris Thomas Ltd.
Churchill Retirement Living Planning Issues
CL Planning
Cluttons LLP
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Costco Wholesale UK Ltd
Crown Estates
CSJ Planning Consultants Ltd
Cushman & Wakefield
Cyclist Touring Club
David L Walker Chartered Surveyors
David Richmond and Partners
Davis Langdon
Dean Lewis Estates
Deer Park Alpha & South Coast Design Forum
Defence Infrastructure Organisation
Deloitte LLP
Deloitte Real Estate
DHA Planning & Development
Dockyard Association
Drayton & Farlington Action Goup
Drayton Centre Portsmouth
DSTL
East Hampshire District Council
Environment Agency
Environment Agency Southern
Fareham Borough Council
Fields In Trust
First Hampshire & Dorset Ltd
First Wessex Housing Group
Firstplan
Foreham Homes Group
Forman Homes Ltd
Fratton Bridge Garage
Fratton Park Area Residents' Association
Friends of Old Portsmouth Association
Friends of Portsdown
Friends of the Earth (Portsmouth)
Friends, Families and Traveller Law Reform Project
G L Hearn
Gerald Eve Surveyors
Gillings Planning
Gleeson Strategic Land
Goadsby and Harding Commercial Ltd
Gosport Borough Council
Gosport Ferry Ltd
Greater Portsmouth Hoteliers' Association
Greater Sylhet District Association, South East Region
Gregory Gray Associates
GVA
Hallam Land Management Limited
Hampshire and Isle of Wight Local Nature Partnership
Hampshire and Isle of Wight Sustainable Business Partnership
Hampshire and Isle of Wight Wildlife Trust
Hampshire Bat Group
Hampshire Buildings Preservation Trust

Hampshire Chamber of Commerce and Industry
Hampshire Constabulary
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Harris Lamb property consultancy
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Health and Safety Executive (HSE)
Heartlands Community Voice
Highways Agency
Historic England
Home Builders Federation
Homes and Communities Agency (HCA)
House Builders Federation
Hovertravel Ltd
HRPG
I Shop Local
Isle of Wight Council
John Lewis Properties
John Pounds
Jonathan Wood Associates Ltd
Jones Lang Lasalle
KF Planning Consultancy
King James Quay Management
Kirkwells town planning and sustainable development consultants
Knight Frank
Lambert Smith Hampton
Land Securities
Landport Community Board
Langstone Harbour Board
LaSalle Investment Management
LDA Design
Leith Planning
Les Weymes Planning Consultancy
Levvel Consulting Ltd
Lingfield Court Residents' Association
Local Dialogue
London Clancy
Luken Beck Ltd
Marine Management Organisation
Martin Grant Homes Ltd.
Mayfair Investments
McKinlay & Co Ltd
Milton Neighbourhood Forum
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Ministry of Defence
Montagu Evans
Montagu Evans LLP
Montagu Land Ltd
MyPool Ltd
National Car Parks Ltd
National Grid
National HMO Lobby
National Landlords Association
National Landlords Association (Portsmouth)
Natural England
Neighbourhood Forums
Net Fishermans Association
Network Rail Infrastructure Ltd
New Forest District Council
NHS Property Services
Northwood (Lakeside)
Oyster Quay Management Limited
Partnership for Urban South Hampshire (PUSH)
PATCH
Paulsgrove and Wymering Community Board (PAWCAB)
Peacock & Smith
Persimmon Homes South Coast
Persimmon Homes South East
planningprospects
Planware Ltd
PLC Architects
Police Crime Commissioner for Hampshire
Pompey Supporters Trust
Port Solent Bertholders Association
Port Solent Community Working Party
Port Solent Yacht Club
Portchester Planning Consultancy
Portchester Society
Portsbridge Utility Association
Portsea Action Group (PAG)
Portsmouth and District Private Landlords Association
Portsmouth and District Private rds Association
Portsmouth and Langstone Sailing Association

Portsmouth and South East Hampshire Partnership
Portsmouth Cathedral
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Portsmouth Clinical Commissioning Group
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Portsmouth Disability Forum
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Portsmouth Harbour Conservation Group
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Portsmouth Naval Base Property Trust
Portsmouth Publishing & Printing Limited
Portsmouth Racial Equality Network Organisation (PRENO)
Portsmouth Ramblers
Portsmouth Society
Portsmouth Supporters Trust
Portsmouth Water Ltd.
POSOL (Port Solent Residents Management Company Limited)
PREIM Ltd (Hilsea Parson Close Residents Company Ltd)
Premier Marinas Limited
Pure Town Planning
QinetiQ
Quadrant Estates
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Royal Mail Group
RPS
RSPB
Safer Portsmouth Partnership
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Solent Protection Society
Somerstown Community Board
South Coast Design Forum
South West Trains
Southampton City Council
Southern Co-operative Ltd
Southern Electric
Southern Water
Southwick and Widley Parish Council
Spice Island Association
Sport England
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SSA Planning Limited
Stagecoach - Portsmouth
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David Barnes
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Devin Smith
Donna Ware
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Duncan Robinson
E Harry
Eddie Salt
Emma Tolley
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Haley Storey
Hanna Jamieson
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Heather Yeomans
Isabel Steele
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Jeanne Spencer
Jerry Bamforth
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Jo Jury
Joanna Godfree
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Karen Nash
Kathleen Pitt
Kathryn Rimmington
Keith Ryall
Kelly Semmens

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Matthew Winnington
Michael Birchmore
Mike Wines
Moira Barber
Nicholas Moore
Nigel Mills
Nigel Scarlett
Oliver Stone-Houghton
Pam Pritchard
Pat Gruchy
Patric O'hara
Paul Docking
Paul Organ
Paul Pritchard
Paula Rimmer
Petronella Nattrass
Philip Pattington
Pippa Woodcock
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Rebecca Langan
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Richard Hillier
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Robin Kay
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Roger Inkpen
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Ruth Emery
S Wallis
S.G. Lloyd
Sally Thomas
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Sarah Mclean
Shelagh Simmons
Shirley Totton
Simon Bunting
Simon Colebrook
Simon Mitchell
Simon Tilley
Sophie Milnes
Stephen Morgan Mp
Steve Bailey
Steven Jenkins
Stuart Potter
Sunny Crouch
Terry Carter
Terry Pearson
Thai Bridgen
Tony Charles
Tracy Cunningham
Trish Bell
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William Thornton

Tipner Strategic Development Area (2019)

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Resident's Management Committee
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Royal Haskoning DHV
Royal Mail Group
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Southampton City Council
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Southern Electric
Southern Housing Group
Southern Inshore Fisheries and Conservation Authority
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Southwick and Widley Parish Council
Sovereign
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Winchester City Council
Woodland Trust
Woods Hardwick Planning Ltd
Woolf Bond Planning
Youth Parliament

MPs:

Stephen Morgan MP
Penny Mordaunt MP

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Adrian Broome
Alberto Garrone
Alex Overy
Alex Venables
Alison Isaac
Alison Isaac
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Amy Robjohns
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Angela Lynne Barnes
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Annette White
Annie Waugh
Arron
B A Crawford
Barry Harmer

Ben Stancliffe
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Bernie Clark
Beryl Shepherd
Bill Jackson
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Bob Day
Brad
Brenda Mansfield
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Captain F.A.A Farrar
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Carol Stevens
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Catherine Bradshaw
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Chris
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Chris Hawkes
Chris Manns
Chris Smith
Christina Birkby
Christina Graydon
Christine Gregory
Christine Martin
Christopher Clark
Chung Shek
Clara Allansson
Clare Seek
Clive Langan
Connor Winter
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David Barnes
David Knight
David Palmer
David Price
Dean Wall
Derek Dod
Derek Dod
Derek Hayday
Devin Smith
Dickie Spurgin
Donna Ware
Doreen Caddick
Duncan Leslie
Duncan Robinson
E Harry
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Elaine Lewry
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Emma Tolley
Ewa Piwowarczyk
Fiona Heath
Frances Knight
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Gary Chalk
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Graham Reed
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H Shaw
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Hanna Jamieson
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Heather Sinclair
Heather Yeomans
Ian Craig
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Isabel Steele
Jack Dancy
Jackie Headon
Jackie Smith
James Daly
James Edmonds
James Ramadan
James Šķila
Jan Mayes
Jane Luxton
Jane Sewell
Janet Bailey
Janet Holt
Janice Loose
Jeanette Dellow
Jeanne Spencer
Jerry Bamforth
Jerry Bamforth
Jessica Taylor
Jill Ryan
Jim Jackson
Jim Jackson
Jim Mcisaac
Jo Jury
Joanna Godfree
Joanne Gale-Chambers
Joe Chamberlain
Joe Chamberlain
John And Sharon
Dungworth
John Cullen
John Edwin Porter
John Macklin
John Murphie
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Bsc(Ost)
Julian Lloyd
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Julie Thompson
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Laura Cross
Lauren Chappell
Leanne Verrier
Lee Gatrell
Leigh Mason
Linda Page

Linda Turner
Lisa Fryer
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Lisa-Marie
Lorraine Proudlock
Louise Nutland
Louise Prowse
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Madeline Morton
Maggie Callan
Maggie Short
Malc Allen
Malcolm Hagan
Marie Dye
Marilyn Anderson
Mark Denman
Mark Gottig
Mark Loveless
Martin Riddle
Mary Mullinger
Matthew Wellspring
Matthew Winnington
Meg Whittaker
Melanie
Michael Birchmore
Michael Burns
Michael Johnson
Michael Nash
Michael O'Driscoll
Michael Steel
Mike Wines
Moira Barber
Molly Burchell
Mr & Mrs Richards
Mr Smith
Nicholas Hicks
Nicholas Moore
Nick Moore
Nigel Bennett
Nigel Mills
Nigel Scarlett
Nigel Scarlett
Olaf
Oliver Stone-Houghton
Pam Pritchard
Pat Gruchy
Patrick O'hara
Paul Davies
Paul Docking
Paul Organ
Paul Pritchard
Paul Tilley
Paul Twine
Paula Lendrum
Peter Higgins
Peter Higgins
Peter J Clark
Peter Pennekett
Philip Pattington
Pippa Woodcock
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Rebecca Bluff
Rebecca Coghlan
Rebecca Denyer
Rebecca Ellcome
Rebecca Langan
Richard
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Richard Gregory
Richard Hillier
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Robert Piggott
Robin Kay
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S.G. Lloyd
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Samantha Dewitt
Samantha Diouf
Sandra Radley
Sandra Wilkie
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Sarah Hewitson
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Sheila Mackie
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Terry Carter
Terry Pearson
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Victoria Taylor
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Portsmouth Plan 2038 Regulation 18 (2021)

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Home Builders Federation
Home Group
Homes and Communities Agency (HCA)
House Builders Federation
Hovertravel Ltd
HW Conveyancing Searches
I Shop Local
IDCRC
Isle of Wight Council
Julian Lloyd
John Pounds
Jonathan Wood Associates Ltd
Jones Lang Lasalle
KF Planning Consultancy
King James Quay Management
Kirkwells
Knight Frank
Lambert Smith Hampton
Landport Community Board
Langstone Harbour Board
LaSalle Investment Management
LDA Design
Leith Planning
Les Weymes Planning Consultancy
Levvel Consulting Ltd
Lichfields
Lingfield Court Residents' Association
Local Dialogue
London Clancy
Luken Beck Ltd
Marcus Laing
Marine Management Organisation
Mayfair Investments
McKinlay & Co Ltd
Milton Neighbourhood Planning Forum
MOD
Montagu Evans LLP
Montagu Land Ltd
MyPool
National Car Parks Ltd
National Grid
National HMO Lobby
National Landlords Association
Natural England
Neighbourhood Forums
Neighbourhood-planning.co.uk
Net Fisherman's Association
Network Rail
New Forest District Council
NHS Portsmouth CCG
NHS Property Services
NHS Property Trust
NHS Southern Health
Northwood (Lakeside)
Obsidian
Oyster Quay Management Limited

Partnership for Urban South Hampshire (PUSH)
PATCH
Paulsgrove and Wymering Community Board (PAWCAB)
Paulsgrove Residents Association
Persimmon Homes South Coast
Persimmon Homes South East
Pickup Town Planning
Planning Prospects
Planware Ltd
PLC Architects
Police Crime Commissioner for Hampshire
Pompey Supporters Trust
Port Solent Bertholders Association
Port Solent Community Working Party
Port Solent Yacht Club
Portchester Planning Consultancy
Portchester Society
Portsbridge Utility Association
Portsea Action Group (PAG)
Portsmouth and District Private Landlords Association
Portsmouth and Langstone Sailing Association
Portsmouth and South East Hampshire Partnership
Portsmouth Cathedral
Portsmouth City Council
Portsmouth City Council Equalities Service
Portsmouth Clinical Commissioning Group
Portsmouth Commercial Port
Portsmouth Cultural Trust
Portsmouth Cycle Forum
Portsmouth Diocese
Portsmouth Disability Forum
Portsmouth Fabian Society
Portsmouth Football Club
Portsmouth Harbour Conservation Group
Portsmouth Harbour Cruising Club
Portsmouth Hockey Club
Portsmouth Hospitals NHS Trust
Portsmouth International Port
Portsmouth Labour Party, GMB
Portsmouth Naval Base Property Trust
Portsmouth Port
Portsmouth Publishing & Printing Limited
Portsmouth Racial Equality Network Organisation (PRENO)
Portsmouth Society
Portsmouth Supporters Trust
Portsmouth Water Ltd.
POSOL (Port Solent Residents Management Company Limited)
PREIM Ltd (Hilsea Parson Close Residents Company Ltd)
Premier Marinas Limited
Pure Town Planning
QinetiQ
Quadrant Estates
Queen's Harbour Master Portsmouth
Quod
Radian
Railway Pension Funds
RAPS
Residential Landlords Association
Residents Association of Port Solent
Resident's Management Committee
RHB Partnership LLP
Royal Haskoning DHV
Royal Mail Group
RPS Group
RSPB
Safer Portsmouth Partnership
Sage Group
Savills
Scotia Gas Networks
Scottish and Southern Energy Plc
Sellar Properties (Stadium Developments) Limited, c/o Cushman & Wakefield
SGN
Shaping Portsmouth Development Group
Showman's Guild of Great Britain
Sirius House Residents Association
Sirius Planning
Solent Forum
Solent Protection Society
Somerstown Community Board
South Coast Design Forum
South Coast Surveyors
South West Trains
South Western Railways
Southampton City Council
Southern Co-operative Ltd
Southern Electric

Southern Housing Group
Southern Inshore Fisheries and Conservation Authority
Southern Water
Southwick and Widley Parish Council
Sovereign
Sport England
SSA Planning Limited
Stagecoach South
Stamshaw and Tipner Residents Forum
Stamshaw Lake Angling Club
Stewart Ross Associates
Strutt and Parker
Sustrans
Tabacon.co.uk
Terence O'Rourke Plc
Tesni Properties Ltd
Tetlow-King Planning
Tetra Tech
The Campaign for Real Ale
The Children's Trust
The Environment Centre
The Harbour School
The Kings Theatre Trust Ltd.
The Marine Management Organisation (MMO)
The National Federation of Gypsy Liaison Groups
The National Romani Rights Association
The New Theatre Royal
The Planning Lab
The Pompey Centre
The Theatres Trust
Tipner Regeneration Co. Ltd
Tourism South East
Town Centes / Trader's Associations
Trafalgar Wharf Ltd
Turley
Tutton Town Planning Consultants Ltd
UK Youth Parliament
University of Portsmouth
University of Portsmouth Student Union
Urban DNA
Vail Williams
VIVD
Voluntary Sector Support
We Will Check It
Wexham Homes Ltd.
Wightlink Isle of Wight Ferries Ltd.
Wightlink Limited
Winchester City Council
Woodland Trust
Woods Hardwick Planning Ltd
Woolf Bond Planning
Youth Parliament

MPs:

Stephen Morgan MP
Penny Mordaunt MP

Councillors:

Councillor Ben Dowling
Councillor Benedict Swann
Councillor Cal Corkery
Councillor Claire Udy
Councillor Darren Sanders
Councillor Dave Ashmore
Councillor David Fuller
Councillor Donna Jones
Councillor Frank Jonas BEM
Councillor Gemma New
Councillor George Fielding
Councillor Gerald Vernon-Jackson CBE
Councillor Graham Heaney
Councillor Hannah Hockaday
Councillor Hugh Mason
Councillor Jason Fazackarley
Councillor Jeanette Smith
Councillor Jo Hooper
Councillor John Ferrett
Councillor Judith Smyth
Councillor Lee Hunt
Councillor Lee Mason
Councillor Leo Madden
Councillor Linda Symes

Councillor Luke Stubbs
Councillor Luke Stubbs
Councillor Lynne Stagg
Councillor Matthew Atkins
Councillor Matthew Winnington
Councillor Neill Young
Councillor Rob Wood
Councillor Robert New
Councillor Scott Payter-Harris
Councillor Simon Bosher
Councillor Stephen Pitt
Councillor Steve Pitt
Councillor Steve Wemyss
Councillor Suzy Horton
Councillor Terry Norton
Councillor Tom Coles
Councillor Tom Wood
Councillor Will Purvis

Persons:

A Broone
Abhai Pandya
Adam George
Adrian Broome
Alberto Garrone
Alex Overy
Alex Venables
Alison Isaac
Alison Isaac
Alison Robinson
Alison Rundle
Amanda Aldridge
Amy Robjohns
Andrea Griffin
Andrew Henderson
Andrew Weir
Andrew Young
Andy Cole
Andy Croft
Andy Mccallum
Angela Khopkar
Angela Lynne Barnes
Anna Koor
Anna Tindall
Anne Hounam
Annette White
Annie Waugh
Arron
B A Crawford
Barry Harmer
Ben Stancliffe
Bernard Clark
Bernie Clark
Beryl Shepherd
Bill Jackson
Bill Jackson
Bob Day
Brad
Brenda Mansfield
Brizz Miles-Knight
Bruce Burr-Lonnon
Bruce Burr-Lonnon
Byron Jones
Captain F.A.A Farrar Dalmar
Carl Boyett
Carly Mcneil
Carol Stevens
Carolyn Barber
Catherine Bradshaw
Cherry Rattue
Chris
Chris Clark
Chris Fogden
Chris Hawkes
Chris Manns
Chris Smith
Christina Birkby
Christina Graydon
Christine Gregory
Christine Martin
Christopher Clark
Chung Shek
Clara Allansson
Clare Seek
Clive Langan
Connor Winter
Daniel Wildman
Danielle
Dave Williams
David Barnes
David Knight
David Palmer

David Price
Dean Wall
Derek Dod
Derek Dod
Derek Hayday
Devin Smith
Dickie Spurgin
Donna Ware
Doreen Caddick
Duncan Leslie
Duncan Robinson
E Harry
Eddie Salt
Elaine Elstone
Elaine Lewry
Ellis Hampton
Emma Tolley
Ewa Piwowarczyk
Fiona Heath
Frances Knight
Frances Knight
Gary Chalk
Gary Morris
Gillian Park
Glynn Curtis
Graham Allibone
Graham Reed
Guy Wilkerson
H Shaw
Haley Storey
Hanna Jamieson
Harvey Gill
Hayley Carter
Heather Sinclair
Heather Yeomans
Ian Craig
Ian Townley
Ian Walker
Isabel Steele
Jack Dancy
Jackie Headon
Jackie Smith
James Daly
James Edmonds
James Ramadan
James Šķila
Jan Mayes
Jane Luxton
Jane Sewell
Janet Bailey
Janet Holt
Janice Loose
Jeanette Dellow
Jeanne Spencer
Jerry Bamforth
Jerry Bamforth
Jessica Taylor
Jill Ryan
Jim Jackson
Jim Jackson
Jim Mcisaac
Jo Jury
Joanna Godfree
Joanne Gale-Chambers
Joe Chamberlain
Joe Chamberlain
John And Sharon Dungworth
John Cullen
John Edwin Porter
John Macklin
John Murphie
Jonathan Butterworth Bsc(Ost)
Julian Lloyd
Julian Lloyd
Julie Thompson
June Wilson
Justin Bateman
Karen Nash
Karen Ward
Kate Brady
Kathleen Pitt
Kathryn Rimmington
Keith Jordan
Keith Ryall
Kelly Semmens
Ken Raby
Ken Wise
Kevin Edwards
Kevin Farrar
Kim Mansfield
Kosala Bandara
Larry Nicholas
Laura Burden
Laura Cross
Lauren Chappell
Leanne Verrier

Lee Gatrell
Leigh Mason
Linda Page
Linda Turner
Lisa Fryer
Lisa Taylor
Lisa-Marie
Lorraine Proudlock
Louise Nutland
Louise Prowse
Luke Jerome
Madeline Morton
Maggie Callan
Maggie Short
Malc Allen
Malcolm Hagan
Marie Dye
Marilyn Anderson
Mark Denman
Mark Gottig
Mark Loveless
Martin Riddle
Mary Mullinger
Matthew Wellspring
Matthew Winnington
Meg Whittaker
Melanie
Michael Birchmore
Michael Burns
Michael Johnson
Michael Nash
Michael O'Driscoll
Michael Steel
Mike Wines
Moira Barber
Molly Burchell
Mr & Mrs Richards
Mr Smith
Nicholas Hicks
Nicholas Moore
Nick Moore
Nigel Bennett
Nigel Mills
Nigel Scarlett
Nigel Scarlett
Olaf
Oliver Stone-Houghton
Pam Pritchard
Pat Gruchy
Patrick O'hara
Paul Davies
Paul Docking
Paul Organ
Paul Pritchard
Paul Tilley
Paul Twine
Paula Lendrum
Peter Higgins
Peter Higgins
Peter J Clark
Peter Pennekett
Philip Pattington
Pippa Woodcock
R. Astor
Rachael Wilkinson
Rachel Hudson
Ray Cobb
Ray Willis
Raymond Lovett
Rebecca Bluff
Rebecca Coghlan
Rebecca Denyer
Rebecca Ellcome
Rebecca Langan
Richard
Richard Cady
Richard Gregory
Richard Hillier
Richard Hussey
Richard Rogersman
Richard Treloar
Rob Jacob
Robert Piggott
Robin Kay
Robin Wynn
Rodney L Barnes
Roger Airey
Roger Boyce
Roger Inkpen
Roseanne Puddicombe
Ross Kiddle
Ruth Emery
S Forest
S Grayson-Smith
S Green
S Wallis

S.G. Lloyd
Sally Thomas
Samantha Dewitt
Samantha Diouf
Sandra Radley
Sandra Wilkie
Sarah Freer
Sarah Hewitson
Sarah Mclean
Sharron Doherty
Sheila Mackie
Sheila Mackie
Shelagh Simmons
Shirley Totton
Simon Bunting
Simon Colebrook
Simon Dodd
Simon Finney
Simon Marshall
Simon Mitchell
Simon Tilley
Simon White
Sophie Cardinal
Sophie Milnes
Stephen Fisher
Stephen Morgan Mp
Steve Bailey
Steve Colbey
Steve Jacobs
Steven Jenkins
Stuart Potter
Stuart T
Stuart Walburn
Suneil Rudra
Sunny Crouch
Susan Dorey
Susan Ratcliffe
Suzanne Mcshane
Terry Carter
Terry Pearson
Thai Bridgen
Thomas Brown
Tim Owens
Tony Charles
Tracy Cunningham
Trish Bell
Victor Graham Chatwin
Victoria Taylor
Viktoria Kovas
William Thornton

Portsmouth Pre-Submission Local Plan (2024)

Bodies:

1851 Trust

A World With Friends

Abri Group Ltd.

Active8minds

Adams & Co

Advice Portsmouth

Agammemnon Housing Association

Age Concern (Portsmouth)

Age UK Portsmouth - Joining Forces Portsmouth

Agency Pilot Ltd

Air Ambulance

Air Cadets

Alliance Environment & Planning Ltd

Ancasta Port Solent

Andrew Simpson Centre

Arcus Consultancy Services Ltd

Arms Around The Child

Arqiva

Art Space

Aspex

Autism Hampshire

Avison Young

Avison Young (On behalf of National Gas)

Bangladesh Welfare Association

Barnes, Angela

Baskingstoke and Deane Borough Council

Be Bright - Safer Travel

Beverston Road Residents' Group

BH Live

Bidwells

Black Hat Theatre Group

BNP Paribas Real Estate

Boarhunt Parish Council (Fareham)

Boogie Mites

Bounce Fitness

Bramsdon & Childs

Bray, Jon

Breast Feeding Network

Brendoncare - Good Companion Club

British Gas

British Heart Foundation

British Property Federation

British Triathlon

Brittany Ferries

Broadway Malyan

Bryan Jezeph Consultancy

BT

BT Group plc

BT Openreach

Butterfly Conservation

Campaign for the Protection of Rural England (CPRE)

Caritas Portsmouth

Cascades Shopping Centre

CBRE Limited Premier Marinas

CCG

CHAOS

Chapman Lily Planning Limited
Chichester Harbour Conservancy
Chichester Harbour Conservancy
Choices For You
Choices For You
Chris Thomas Ltd.
Citizens Advice Portsmouth
City Fibre
City of Portsmouth College
CM Sports
Coal Authority
Coastal Partners
Community Kettle
Connors Toy Library
Cosham business association
CPRE Hampshire
Critchley Architecture And Design Limited
Crown Estate
CTEC Energy
Cultural Education Partnership
Cushman & Wakefield
Dallaglio Rugby
David L Walker Chartered Surveyors
Dean Lewis Estates
Debbie Pinhorne Bows
Denmead Parish Council
DevPlan
Diocese of Portsmouth (Anglican)
Dockyard Association
Drayton & Farlington Action Goup
Drayton Centre Portsmouth
Drum Nation Tribe
DSTL
East Hampshire District Council
Eastleigh Borough Council
EC Roberts (The Roberts Centre)
EE Limited
Elephant in Scarlet CIC
Elivia Homes
Enable Ability
Environment Agency
Ethnic Minority Achievment service
Fabian Society
Faith and Football
FALAFEL HOUSE
Family Church
Fareham Borough Council
FareShare
Federation of Small Businesses (FSB)
Female Entrepreneurs Network
Fields In Trust
First Bus
First Hampshire & Dorset Ltd
First Wessex Housing Group
Flude Property Consultants
Follow Your Dreams
Foreham Homes Group
Fratton Big Local
Fratton Park Area Residents' Association
Freshwave
Friends fighting cancer
Friends of Old Portsmouth Association

Friends of Portsdown

Friends of the Earth (Portsmouth)

Friends, Families and Traveller Law Reform Project

Funk Format

Gig Buddies Aldingbourne Trust

Gillings Planning

Girl Guiding

Gladiator Portsmouth

Gladman Developments

Gleeson Strategic Land

Globefit

Goly Natural

Good Gym

Gosport Borough Council

Gosport Ferry Ltd

Grateful Arts Club

Gregory Gray Associates

HAF holidays activities and food

Hallam Land Management Limited

Hampshire & IOW Wildlife Trust

Hampshire & Isle of Wight Fire and Rescue Service

Hampshire & Isle of Wight Police & Crime Commissioner

Hampshire and Isle of Wight Constabulary

Hampshire and Isle of Wight Local Nature Partnership

Hampshire and Isle of Wight Sustainable Business Partnership

Hampshire Bat Group

Hampshire Buildings Preservation Trust

Hampshire Chamber of Commerce and Industry

Hampshire County Council

Hampshire District Council

Hampshire Fire and Rescue

Hampshire Swifts

Happy Healthy Kidz Team

Harbour Cancer

Hart Disctrict Council

Hartnell Taylor Cook

Havant and South Downs College

Havant Borough Council

Haven Good Neighbours

Health and Safety Executive

Health, Housing & Social Care-Housing Options

Heart of Portsmouth Boxing Academy

Heartlands Community Voice

Hellier Langston

Highways England

Hindu Cultural Association

Historic England

Hive - Friend Finder Official

HOLLOWAY ILIFFE & MITCHELL LIMITED

Home-Start Portsmouth

Homes England

House Builders Federation

Hover Travel

International First Aid Stan

Isle of Wight Council

Jedi Fitness Training

Joe Gamlin LTD

Junk Yard Funk Yard

Jury, Joanna

Keygrove Chartered Surveyors

KF Planning Consultancy

King James Quay Management

King's Harbour Master Portsmouth

King's Theatre (Konnect)

KK Crafts Workshop

Knight Frank

Lambert Smith Hampton

Land Consents Manager

Land Securities Group

Landport Community Board

Landport Community Centre

Langstone Harbour Board

Langstone Harbour Fishermen's Assoc.

Latvian Community in Portsmouth

Learning disability champion

Levvel Consulting Ltd

Lily&Lime Minstead Trust

Lingfield Court Residents' Association

Local Dialogue

LONDON CLANCY LIMITED

Marine Management Organisation

Mary Rose Trust

Mencap

Mens Sheds

Milton Neighbourhood Forum

Ministry of Defence Estates Operations

Mobile UK

Montagu Evans LLP

Motiv8

MRTPI (Retd)

My Wonderful Yoga

Myddelton & Major

National Car Parks Ltd

National Gas Transmission

National Grid Plc

National Highways

National Landlords Association

Natural England

Naval Families Federation

Neighbourhood Forums

Net Fishermans Association

Network Rail

New Forest District Council

New Forest National Park Authority

NHS England

NHS Hampshire and Isle of Wight Integrated Care Board

NHS Portsmouth Clinical Commissioning Group

NHS Property Services

Oakley Commercial

Old Portsmouth and Gunwharf Quays Neighbourhood Forum

Omega House Workers' Educational Association (WEA)

Ophir Home

Oyster Quay Management Limited

Partnership for Urban South Hampshire (PUSH)

Paulsgrove Residents Association

PAWS (Paulsgrove and Wymering Scout Group)

Pazmodzi Creatives

PDPLA

Peacock and Smith

Persimmon Homes

Personal Best

Peter Ashley Activity Centres

Philip Marsh Collins Deung

Pickup Town Planning

planningprospects

Planware Ltd

Police Crime Commissioner for Hampshire

Police Student Watch

Polish School Portsmouth

Pompey in the Community

Pompey Supporters' Trust

Port Solent Yacht Club

Portchester Society

Portsbridge Utility Association

Portsmouth & Southsea Tree Wardens

Portsmouth Ambassadors

Portsmouth and Langstone Sailing Association

Portsmouth & District Angling Society

Portsmouth Bangladeshi Business Association

Portsmouth Bengali Community Association

Portsmouth Cathedral

Portsmouth Central Masjid

Portsmouth Chinese Association

Portsmouth Christian Fellowship

Portsmouth Climate Action

Portsmouth City Council

Portsmouth Creates/We Shine - Creative charity

Portsmouth Cycle Forum

Portsmouth Diocese

Portsmouth Disability Advisory Forum

Portsmouth Disability Forum

Portsmouth Foodbank

Portsmouth Harbour Conservation Group

Portsmouth Harbour Cruising Club

Portsmouth Harbour Ferry Company

Portsmouth Hospitals NHS Trust

Portsmouth Hospitals University NHS Trust

Portsmouth International port

Portsmouth Jami Mosque & Islamic Centre

Portsmouth Property Association

Portsmouth Publishing & Printing Limited

Portsmouth Russian Orthodox Parish of St Peter and St Paul

Portsmouth Society

Portsmouth Water

POSOL (Port Solent Residents Management Company Limited)

PREIM Ltd (Hilsea Parson Close Residents Company Ltd)

Premier Marinas

Prime Office Search

Primmer Olds B.A.S

Quartz

Queen Alexandra Hospital

Queen's Harbour Master Portsmouth

Quintons

Rachel Lowe Distribution Limited

Railway Pension Funds

Redwood Park Academy Solent Trust

Reside Developments Limited

Residents Association of Port Solent

Resident's Management Committee

Richborough

Rotary Club of Portsmouth & Southsea

Rowans Hospice

Royal Mail Group

Royal National Lifeboat Institution

RSPB

Rundle Holdings Ltd

Rushmoor Borough Council

Ryde Town Council (Isle of Wight)

Safer Portsmouth Partnership

Salvation Army Haven

Sanderson Weatherall

Scotia Gas Networks

Scottish and Southern Energy Plc

SEHRT

Sellar Properties (Stadium Developments) Limited

SEND Butterflies

SGN

Shaping Portsmouth

Shaping Portsmouth Development Group

Shared lives Portsmouth

Showman's Guild of Great Britain

SHW

Sirius Planning

Sisters of Bethany

Socials for Seniors

Solent Children's Therapy

Solent Forum

Solent Mind

Solent NHS Trust

Solent Partners

Solent Protection Society

Solent Transport

Somerstown Community Board

South Central Ambulance Service

South Coast Design Forum

South Downs National Park Authority

South Western Railway

Southampton City Council

Southern Water

Southsea Coastal Scheme

Southwick and Widley Parish Council

Sovereign HA

Spark Community

Sport England

Spotlight UK

Squires Planning

SSA Planning

SSE Energy Services

SSE PLC

St James Memorial Park Trust

Stagecoach

Stamshaw and Tipner Residents Forum

Stand Up Portsmouth

Stop Domestic Abuse

Strutt and Parker

Survivors of Bereavement by Suicide

Sustainable Conservation Trust

Sustrans

SWAN - Safer Women at Night

Tabacon.co.uk

Tall Ships Youth Trust

Taste of Home

Terence O'Rourke Plc

Test Valley Borough Council

Tetlow-King Planning

The Campaign for Real Ale

The Children's Trust

The Coal Authority

The Detectives - Sherlock Holmes based charity

The Elizabeth Foundation

The Environment Centre

THE GUILDHALL TRUST

The Harbour School

The Marine Management Organisation (MMO)

The MSTRUST

The National Federation of Gypsy Liaison Groups

The National Romani Rights Association

The Portsmouth Hispanic Society

The Portsmouth Society

The Tenth Hole Tearooms

The Theatres Trust

The Woodland Trust

The You Trust

Theatres Trust

Tipner Regeneration Co. Ltd

Tonicmusic

Tourism South East

Town Centes / Trader's Associations

Town of Portsmouth, Rhode Island, USA

Trinity House

UK Power Network Ltd

UK Youth Parliament

UKIM - UK Islamic Mission

University of Portsmouth

University of Portsmouth Students Union

Urban DNA

URBOND

Vail Williams

Virgin Media

VIVID Homes

Wexham Homes Ltd.

Wight Link

Wild City Portsmouth

Winchester City Council

Woolf Bond Planning

Wymering Manor

YOU Trust - Cycling Without Age

Youth Parliament

MPs:

Amanda Louise Martin

Stephen Morgan

Persons:

Roberta Astor

Rod Bailey

Richard Bamforth

Justin Bateman

N Booth

Adrian Broome

Adam Brown

Victor Chatwin

Steve Colbey

Andy Cole

Pete Drake

Ruth Emery

Christopher Fogden

Nicholas Hicks

Richard Hillier

Rachel Hudson

Roger Inkpen

Alison Isaac

William Jackson

Simon Jenkins

Michael Johnson

Byron Jones

Julian Lloyd

Stephen Kerr

David Knight

Julian Lloyd

Raymond Lovett

Kimleigh Mansfield

Jane Mayes

Wezley Moore

Karen Nash

Terry Pearson

Matthew Pickup

Paul Pritchard

Lorraine Proudlock

Eddie Salt

Clare Seek

Beryl Shepherd

Heather Sinclair

Emma Tolley

Shirley Totton

Guy Wilkerson

Rachael Wilkinson

Rachel Wilkinson

C J Wood

Portsmouth Pre-Submission Local Plan Addendum (2025)

Bodies:

1851 Trust
A World With Friends
Abri
Active8minds
Advice Portsmouth
Agamemnon Housing Association
Age Concern (Portsmouth)
Age UK Portsmouth
Air Ambulance
Air Cadets
Ancasta Port Solent
Andrew Simpson Centre
Arms Around The Child
Arqiva
Art Space Portsmouth
Artabelle Furniture
Aspex
Autism Hampshire
Avison Young (UK) Limited
Bangladesh Welfare Association
Baskingstoke and Deane Borough Council
Be Bright - Safer Travel
Beverston Road Residents' Group
BH Live
Bird Aware Solent
Black Hat Theatre Group
Boarhunt Parish Council (Fareham)
Boogie Mites
Bounce Fitness
Bramsdon & Childs
Breast Feeding Network
Brendoncare - Good Companion Club
British Gas
British Heart Foundation - London
British Property Federation
British Triathlon
British Trust for Ornithology
Brittany Ferries
Broadband Vantage
Broadway Malyan
Bryan Jezeph Consultancy Limited
BT
BT Group plc
BT Openreach
Buckland Community Centre
Butterfly Conservation
CAAD Ltd
Campaign for the Protection of Rural England (CPRE) Hampshire
Caritas Portsmouth
CBRE Limited
CCG
Chaos Support
Chapman Lily Planning Limited
Chichester Harbour Conservancy
Choices for You
Chris Thomas Limited
Citizens Advice (Portsmouth)
City Fibre Holdings Limited
City of Portsmouth College
CM Sports (UK) Limited
Coal Authority
Coastal Partners
Community Kettle CIC
Connors Toy Libraries
Critchley Architecture and Design Limited
Crown Estate
Cultural Education Partnership
Dallaglio Rugby
Dean Lewis Estates
Defence Infrastructure Organisation
Defence Science and Technology Laboratory (Dstl)
Denmead Parish Council
DevPlan
Diocese of Portsmouth (Anglican)
Dockyard Association
Drayton Centre Portsmouth
Drum Nation Tribe
E C E Architecture-Planning Limited
East Hampshire District Council
Eastleigh Borough Council
EC Roberts (The Roberts Centre)
Edward Heron MRICS Limited
EE Limited
Elivia Homes
Enable Ability
Environment Agency
Fabian Society

Faith and Football
Family Church
Fareham Borough Council
FareShare
Federation of Small Businesses (FSB)
Female Entrepreneurs Network
Fields In Trust
First Bus
First Hampshire & Dorset Limited
First Hampshire & Dorset Limited
First Hampshire & Dorset Limited
First Wessex Housing Group
Follow Your Dreams
Foreham Homes Group
Fratton Big Local
Fratton Park Area Residents' Association
Friends Fighting Cancer
Friends of Old Portsmouth Association (FOOPA)
Friends of Portsdown Hill
Friends of the Earth (Portsmouth)
Friends, Families and Traveller Law Reform Project
Funk Format
GiffGaff
Gig Buddies Aldingbourne Trust
Gillings Planning
Girl Guiding
Gleeson Strategic Land
Globefit
Good Gym
Good Neighbours Havant
Gosport Borough Council
Gosport Ferry Limited
Grateful Arts Club
HAF Holidays Activities and Food
Hallam Land Management Limited
Hampshire & Isle of Wight Police & Crime Commissioner
Hampshire and IOW Fire and Rescue
Hampshire and Isle of Wight Constabulary
Hampshire and Isle of Wight Local Nature Partnership
Hampshire and Isle of Wight Wildlife Trust (HIWWT)
Hampshire Bat Group
Hampshire Buildings Preservation Trust
Hampshire Chamber of Commerce
Hampshire County Council
Hampshire County Council (Hampshire Achieves)
Hampshire Fire and Rescue
Hampshire Swifts
Happy Healthy Kidz Team
Harbour Cancer Support
Hart Disctrict Council
Havant & South Downs College (Havant)
Havant Borough Council
Health and Safety Executive
Health, Housing & Social Care - Housing Options
Healthwatch Portsmouth
Heart of Portsmouth Boxing Academy
Highways and Urban Design
Highways England
Hindu Cultural Association
Historic England
Home Builders Federation
Home Start
Homes England
Home-Start Portsmouth
Hovertravel
International First Aid Stan
Isle of Wight Council
Jedi Fitness Training
KF Planning Consultancy
King James Quay Management
King’s Harbour Master Portsmouth
Kings Theatre Portsmouth
Knight Frank
Land Securities Group
Landport Community Centre
Langstone Harbour Board
Langstone Harbour Fishermen’s Association
Learning Disability Champion
Lily and Lime LD CIC
Lingfield Court Residents' Association
Local Dialogue
Local Representative and Elm Trials Supervisor
Lyrics
Make Aldingbourne Trust
Marine Management Organisation
Mary Rose Trust
Mencap
Milton Neighbourhood Forum
Ministry of Defence Estates Operations
Mobile UK

Montagu Evans LLP
Motiv8 South Ltd
MRTPI (Retd)
My Wonderful Yoga
National Car Parks Limited
National Gas Transmission
National Grid Plc
National Highways
Natural England
Naval Families Federation
Neighbourhood Forums
Net Fishermans Association
Network Rail
New Forest District Council
New Forest National Park Authority
NHS England
NHS Hampshire and Isle of Wight Integrated Care Board
NHS Portsmouth Clinical Commissioning Group
NHS Property Services
O2 UK Ltd
Old Portsmouth and Gunwharf Quays Neighbourhood Forum
Oyster Quay Management Limited
Partnership for Urban South Hampshire (PUSH)
Paulsgrove Residents Association
PAWS (Paulsgrove and Wymering Scout Group)
Pazmodzi Creatives
PCC Adult Services
PCC Children, Families and Education Services
PCC Contaminated Land Team
PCC Corporate Services
PCC Culture, Leisure and Regulatory Services
PCC Drainage Team
PCC Economic Development and Skills
PCC Economy, Transport and Planning
PCC Ethnic Minority Achievement Service
PCC Finance and Resources
PCC Housing, Neighbourhood and Building Services
PCC Local Highways Authority/ Local Transport Authority
PCC Marketing and Communications
PCC Property and Investment
PCC Public Health
PCC Waste Management Services
PDPLA
Peacock & Smith
Peak Performance Sports
Persimmon Homes
Personal Best
Peter Ashley Activity Centres
planningprospects
Planware Ltd
Police Crime Commissioner for Hampshire and Isle of Wight
Police Student Watch
Polish School Portsmouth
Pompey in the Community
Pompey Supporters' Trust
Port Solent Yacht Club
Portchester Society
Portsbridge Utility Association
Portsmouth & District Angling Society
Portsmouth & Southsea Tree Wardens
Portsmouth Ambassadors
Portsmouth and Langstone Sailing Association
Portsmouth Bangladeshi Business Association
Portsmouth Bengali Community Association
Portsmouth Cathedral
Portsmouth Central Masjid
Portsmouth Chinese Association
Portsmouth Christian Fellowship
Portsmouth Climate Action
Portsmouth Cycle Forum
Portsmouth Diocese
Portsmouth Disability Advisory Forum
Portsmouth Disability Forum
Portsmouth Foodbank
Portsmouth Harbour Conservation Group
Portsmouth Harbour Ferry Company
Portsmouth Hospitals University NHS Trust
Portsmouth International Port
Portsmouth Jami Mosque & Islamic Centre
Portsmouth Russian Orthodox Parish of St Peter and St Paul
Portsmouth Society
Portsmouth Water
POSOL (Port Solent Residents Management Company

Limited)
PREIM Ltd (Hilsea Parson Close Residents Company Ltd)
Premier Marinas
Queen Alexandra Hospital
Railway Pension Funds
Redwood Park Academy Solent Trust
Reside Developments Limited
Residents Association of Port Solent
Resident's Management Committee
Robert Tutton Town Planning Consultants Ltd
Rotary Club of Portsmouth & Southsea
Rotary Club of Southsea Castle
Rowans Hospice Charity
Royal Mail Group
Royal National Lifeboat Institution
RSPB
Rushmoor Borough Council
Ryde Town Council
Salvation Army
Savills
Scotia Gas Networks
Seekers Create
SEND Butterflies
SGN
Shaping Portsmouth Development Group
Shared lives Portsmouth
Shine 4 U Records
Showman's Guild of Great Britain
Sirius Planning
Socials for Seniors
Solent Children's Therapy
Solent Growth Partnership
Solent NHS Trust
Solent Protection Society
Solent Transport
Somerstown Community Board
South Central Ambulance Service
South Coast Design Forum
South Downs National Park Authority
South Western Railway
Southampton City Council
Southern Water
Spark Community Space
Sport England
Spotlight UK
Squires Planning
SSE Energy Services
SSE PLC
Stagecoach
Stamshaw and Tipner Residents Forum
Stand Up Portsmouth
Stop Domestic abuse
Survivors of Bereavement by Suicide
Sustainable conservation trust
SWAN - Safer Women at Night
Swifts Local Network: Swifts & Planning Group
Tabacon.co.uk
Tall Ships Youth Trust
Terence O'Rourke Plc
Test Valley Borough Council
Tetlow-King Planning
The Campaign for Real Ale
The Children's Trust
The Coal Authority
The Detectives - Sherlock Holmes based charity
The Elizabeth Foundation
The Elizabeth Foundation
The Environment Centre
The Fratton Big Local
The Guildhall Trust
The Harbour School
The Marine Management Organisation (MMO)
The MSTRUST
The National Federation of Gypsy Liaison Groups
The National Romani Rights Association
The Planning Bureau
The Portsmouth Society
The Showmen’s Guild of Great Britain
The Team
The Theatres Trust
The Woodland Trust
The You Trust
Theatres Trust
Three/Hutchinson G3 UK Ltd
Tonicmusic
Tourism South East
Town Centes / Trader's Associations
Town of Portsmouth, Rhode Island, USA
Trinity House
UK Power Network Ltd
UKIM - UK Islamic Mission
Union4 Planning

University of Portsmouth
University of Portsmouth Students Union
URBOND
Vail Williams Limited
Virgin Media
VIVID Homes
Vodafone Ltd
Wexham Homes Ltd.
Wight Link
Wild City Portsmouth
Winchester City Council
Woolf Bond Planning
Wymering Manor
YOU Trust - Cycling Without Age
Youth Parliament

MPs:
Amanda Martin MP
Stephen Morgan MP

Persons:

A Kubie
Aaron Parker
Abbey Hollands
Abdul Haque
Abigail Perrow
Abigail Skinner
Abigail Wytchard
Adam Daniels
Adam Gittins
Adam Haggart
Adam Hudson
Adam Humprys
Adam Turner
Addy Vachon
Adele Birdsall
Adele Clark
Adele Graham
Adele Laidler
Adele Wilkinson
Adrian Broadbent
Adrian Coward
Adrian Dawn
Adrian Lee
Adrian Pope
Adrian Shore
Adrian Smith
Adrian State
Adrian Stone
Adrian Taylor
Adrian Yardley
Adrie Owen
Adrienne Marriott
Aelwen Emmett
Aidan Dempsey
Aiden Niall Hopkinson
Aileen Taylor
Ailie Steele
Ailsa Chambers
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Ailsa Richards
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Alan Leesmith
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Alasdair Gove
Alastair Henderson
Alastair Rubie

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Alex Matthews
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Alex Simmons
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Alex Whitehouse
Alexa Crowe
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Alice Onion
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Cetra Coverdale Pearson
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Charlotte Preece
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Claire Gard
Claire Gay

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Claire Webster Saaremets
Claire Whittington
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Clare Dark
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Clare Mach
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Clare Marshall
Clare Pawley
Clare Pruden
Clare Reynolds
Clare Robinson
Clare Stancliffe
Clare Thomson
Claud Robert Snell
Claudia Chester
Claudia Mitchell
Claudia Weis
Claxby Pluckacre
Clea Kahn
Cliff Garvey
Cliff McGaughey
Cliff Morrison
Cliff Rogers
Clifford James
Clifford Pledge
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Clive Chatters
Clive Davis
Clive Embling
Clive Hampton
Clive Heeley
Clive Herring
Clive Kelly
Clive Kitchener
Clive Pearson
Clive Wood
Coby Gardiner
Colette Griffiths
Colette Jones
Colin Barnfield
Colin Beetlestone
Colin Britt
Colin Bundy
Colin Dann
Colin Davey
Colin Downes
Colin Eastman
Colin Foster
Colin Fry
Colin Grimmett
Colin Hicks
Colin Hughes
Colin Jacob
Colin Kirman
Colin Knowles
Colin Major
Colin Morriss
Colin Mortimer
Colin Nichols
COLIN OGDEN
Colin Randall
Colin Riches
Colin Robertson
Colin Rushby
Colin Shaw
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Colin Wilson
Colin Woods
Collette Young
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Conchi Contreras-Alonso
Conny Gilmore
Conor Earnshaw
Conor O'Hagan
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Constance Hart de Keating
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Corinne Elizabeth Young
Corinne Lusher
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Councillor Benedict Swann
Councillor Brian Madgwick
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Councillor Darren Sanders
Councillor Dave Ashmore
Councillor Emily Strudwick
Councillor Frank Jonas
Councillor George Fielding
Councillor George Madgwick
Councillor Gerald Vernon-Jackson CBE (Lord Mayor of Portsmouth)
Councillor Graham Heaney
Councillor Hannah Brent
Councillor Hugh Mason
Councillor Ian Holder
Councillor Jason Fazackarley
Councillor Judith Smyth
Councillor Kimberly Barrett
Councillor Lee Hunt
Councillor Leonie Oliver
Councillor Mark Jeffery
Councillor Mary Vallely
Councillor Matthew Winnington
Councillor Peter Candish
Councillor Raymond Dent
Councillor Russell Simpson
Councillor Simon Bosher
Councillor Steve Pitt
Councillor Stuart Brown

Councillor Suzy Horton
Councillor Yinka Adeniran
Craig Annan
Craig Brereton
Craig Seeley
Cressida Harden
Crispin Pennington
Cristian Moore
Cynthia Bidwell
D Bayliss
D C Briscoe
Daisy Drake
Dale Jones
Dale Reed
Dan Bindon
Dan Hoare
Dan Hobson
Daniel Brown
Daniel Clark
Daniel Higgs
Daniel Hope
Daniel Marshall
Daniel Preter
Daniel Taylor
Daniel Turner
Danielle Free
Danny Collett
Danny Miller
Daphne Dear
Daphne Rumball
Daphne Toll
Darcey Castledine
Darren Andrews
Darren Lawrence
Darren Welsh
Daryl Buck
Daryl Helen Bradbury
Davd Royston
Dave Aspland
Dave Bissitt
Dave Hetling
Dave Hilliard
Dave Jones
Dave Kilbey
Dave Lyons
Dave Newell
Dave Osborne
Dave Pearson
Dave Powell
Dave Shinton
Dave Tuckwood
Dave Vick
David Abell
David Adelson
David Agombar
David Amor
David Atkinson
David Bailey
David Barrie
David Bates
David Beers
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David Bird
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David Bonner
David Boothman
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David Brazier
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David Bulkeley
David Butt
David Camp
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David Cassie
David Chivers
David Christie
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David Curley
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David Elliott
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David Errington
David Fairbairn
David Firth
David Flanders
David Gardener
David Gibbon
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David Goddard
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David Jeffreys
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David Kershaw
David Kittow
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David Langley
David Leadbetter
David Learner
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David Liney
David Livingstone
David Mallard
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David McEvoy
David McNamara
David Meanwell
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David Rogerson
David Roslyn
David Sammon
DAVID SAMPSON
David Secker
David Sewart
David Sherwin
DAVID SIMPSON
David Skinner
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David Spurgeon
David Staley
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David Woollaston
David Worland
Dawn Bazzoni
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Dawn Cosh
Dawn Douglas
Dawn Gear
Dawn King
Dawn Malpass
Dawn Mitford-Slade
Dawn Sherratt
Dawn Smith
Dean Brown
Dean Clarke
Deana Heath
Deanne Walsh
Deb Addison
Deb Brownlee
Deb Frost
Deb Palin
Debbi James-Saunders
Debbie Collins
Debbie Elder
Debbie Hill
Debbie Lewis
Debbie Onslow
Debbie Priest
Debbie Stevens
Debbie Symons
Debbie Williams
Deborah Anniss
Deborah Chapman
Deborah Clarke
Deborah Gatty
Deborah Hewlett
Deborah Saunders
Deborah Slee
Deborah Stone
Deborah Taylor
Deborah Tuck
Deborah Wood
Deborah Wright
Debra Barrell
Debra Blinston
Debra Britton
Debra Brown
Debra Burbery
Debra Donovan
Debra Greening
Debra Manning-Webb
Debra Palm
Debrea Lewis
Debs Hipkiss
Debs Joyce
Dee Camps
Dee D'e
Dee Govan
Dee Paterson
Dee Whittington
Deirdre Denn
Deirdre Johnson
Deirdre Palmer
Deirdre Smith
Delia Mansfield
Delphine Holman
Delphine Palmowski
Dena Parry
Denis Cox
DENIS ROWE
Denise Bartholomew
Denise Brassington
Denise Burrows
Denise Clarke
Denise Fletcher
Denise Geeves
Denise Gizauskas
Denise Jacques

Denise Mary Butler
Denise Packham
Denise Richards
Denise Robinson
Denise Rushby
Denise Sawyer
Denise Solomon
Denise Truelove
DENISE WALSHE
Denise Wells
Denise Westwick
Dennis Boast
Dennis Dungate
Dennis frost
Dennis Harrison
Dennis Smith
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Denys Gaskill
Denzil Longland
Derek Antropik
Derek Biggs
Derek Grover
Derek Hitchcock
Derek John White
Derek O'Brien
Derek Pike
Derek Richardson
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Derek Woodyatt
Derri Kendall Slatcher
Derrick Smith
Desmond Coffey
Desmond Ryan
Di Tiddy
Diana Allchorne
Diana Benians
Diana Browne
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Diana Coles
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Diane Balcombe
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Diane Honeywell
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Dianne Charysz
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Dianne Saw
Dianne Strang
Dianne Timbey
Dianne Wagstaff
Dione McKenna
Dominic Marriott
Dominic Melero
Don Cuddon
Don Manhire
Don Webber
Donald Dinsdale
Donna Barker
Donna Bentham
Donna Craven
Donna Earrey
Donna Galway
Donna Heath
Donna Maguire
Donna Springer
Donna Woods
Doreen Hackney
Doreen Hemsley
Doreen Sillett
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Dorota Hawthorn
Dorothy Bates
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Dorothy Hodgson
Dorothy Isgrove
Dorothy Marshall
Dorothy Robertson
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Doug Bottrell
Doug Milford
Doug Simpson
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Dr Marie Polley
Dr Paul Cross
Dr Peter Bowen-Walker
Dr Robert Wolton
Dr VIRGINIA GREENWOOD
Dr. James Robinson
Dr. Nigel Scarlett
Dreen Chestnutt
Dudley Taylor
Duncan Gartside
Duncan Gould
Duncan McNeil
E Coleman-Smith
E Smith
E Thompson

Ed Sanders
Edith Finbow
Edith Harkins
Edith Husk
Edmund Norman
Edna Troy
Edward Barratt
Edward Cook
Edward Hodgkinson
Edward King
Edward Lusardi
Edward Meardon
Edward Murray
Edward Weber
Edwin Barnes
Edwina Channon
Edwina Pickering
Eileen Betteridge
Eileen Gorrod
Eileen Hughes
Eileen Lawrence
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Eleanor Dennison
Eleanor Hinmers
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Eleanor Thompson
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Elisabeth Müller
Elise Palmer
Eliza Mcguigan
Elizabeth Barnes-Downing
Elizabeth Bradford
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Elizabeth Storey
Elizabeth Symonds
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Elizabeth Tebbutt
Elizabeth Watson - Wright
Elizabeth Webb
Elizabeth Whitehouse
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Elizabeth Whittaker
Elizabeth Woodford
Ella Silk
Ella Whitehill
Ellen Portess
Ellen Strong
Ellice Ashdown
Ellie Davis
Ellie Middleton
Elliot Jones
Elly Charles
Elspeth Brien
Elspeth Mackeggie Gurney
Elspeth Monaghan
Emily Bainbridge
Emily Fowler
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Emily Thwaite
Emma Aspden
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Emma Devine
Emma Gueterbock
Emma Horton
Emma Oliver
Emma Overton
Emma Robertson
Emma Simmoms
Emma Tame
Emmeline Hannelly
Emmie Cotter
Enid Burman
Eric Bignell
Eric Birznieks
Eric Harris-Scott
Eric Jeffery

Erica Connolly
Erica Goodwin
Erica Wilson
Erika Jakins
Esther Gardiner
Esther Higgins
Esther Munro
Eunice Parker
Eunice Phillips
Eve Morris
Eveline Hayes
Eveline Wee
Evelyn Jefferies
Evelyn Stace
Evelyn Waugh
Everard Daniel
Everly Webber
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F McElderry
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Faith Richards
Fay Woolterton
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Felicity Hughes
Felicity Lloyd
Felicity Tucker
Fenton Court
Fezz Kinzett
Fintan McKiernan
Fiona Alexander
Fiona Brookfield
Fiona Carmichael
Fiona Churchill
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Fiona Cousland
Fiona Deighton
Fiona Dutton
Fiona Eccleston
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Fiona Greaves
Fiona Jacques-Stevens
Fiona Maclean
Fiona Mosley
Fiona Newell
Fiona Paul-Sobral
Fiona Quinn
Fiona Simpson
Fiona Smith
Fiona Story
Fiona Tracy Forster
Fleur-Antoine Wilmott
Fliss Sumner
Florence Beetlestone
Florence Gallien
Fran SinclairTaylor
Fran Smitherman
Frances Burrows
Frances Exley
Frances Geesin
Frances Kelly
Frances King
Frances Kitsell
Frances Lawrence
Frances Leach
Frances Lovett
Frances Miles
Frances Morris
Frances Rawle
Frances Walton
Francesca Badcock
Francesca Lazarski
Francesca Toal
Frank Branch
Frank Delacoe
Frank Griffiths
Frank Horan
Fred Muskett
Freda Cave
Freda Evans
Freda Gibbs
Freda Noble
Frederica Jones
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Frederick Donaldson
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G Russell
Gabor Schulcz
Gabrielle Norton
Gaik Hunt
Gail Cartwright
Gail Courtney
Gail Cox
Gail Greaves
Gail Lannin
Gail Lee
Gail Mathie
Gail Richens
Gail Taylerson
Gail Tucker
Gareth Dearlove
Gareth Huw Lewis
Garry Dean
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Garry Goddard
Garth Lowe
Garvin Cadman
Gary Bennett
Gary Brown
Gary Burt
Gary Cassar
Gary Cubbage
Gary Fennemore
Gary Freer
Gary Goffin
Gary Henshaw
Gary Luton
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Gary Prescott
Gary Stimson
Gary Wheeler
Gary Wintle
Gavin Everson
Gavin Eves
Gavin Mckerrell
Gavin Watton
Gay Cullen
Gaye Harrison Kelly
Gaynor Hulme
Gaynor Simpson
Gemma Heath
Gemma Jenkins
Gemma Maine
Gemma Pope
Geoff Collins
Geoff Dagger
Geoff Dicker
Geoff Hodson
Geoff Palmer
Geoff Sebire

Geoff Settatree
Geoff Smith
GEOFFREY ANDERSON
Geoffrey Howell
Geoffrey Osborn
Geoffrey Tyler
George Baker
George Bannister
George Batho
George Kontou
George Lewis
George Nelson
George Parfitt
George Shaw
George Sing
Georgia Witton-Maclean
Georgina Best
Georgina Bochmann
Georgina Masunaga
Georgina Nunney
Georgina Richardson
Gerald Allrn
Gerald Carey
Gerald Corden
Gerald Hallam
Gerald Salvat
Geraldine Beedle
Geraldine Ellis
Geraldine Martinsen
Geraldine Niven
Geraldine Prescott
Geraldine Welham
Gerard Gardner
Gereldene Cardwell
Gerri Jacobs
Ghislaine Parkes
Gill Aherne
Gill Allcock
Gill Buckeridge
Gill Christie
Gill Davis
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Gill Farmer
Gill Gooch
Gill Hardy
Gill Hazell
Gill Hutchings
Gill Jakeman
Gill Jobbins
Gill Kerry
Gill Kirby
Gill Mead
Gill Newham
Gill Press
Gill Proud
Gill Shaw
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Gillan Garland
Gillian Barnard
Gillian Beggs
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Gillian Brett
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Gillian Chalk
Gillian Charters
Gillian Clarke
Gillian Clough
Gillian Deadman
Gillian Edmunds
Gillian Fieldwick
Gillian Fisher
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Gillian Grudzinska
Gillian Handyside
Gillian Harmer
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Gillian Plaice
Gillian Riley
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Gillian Weller
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Gilly Newell
Gina Chatburn
Gina Reed
Ginnie E Copsey
Giselda Phillips
Giulia Argyll Nicholson
Glen Roach
Glen Singleton
Glen Turner
Glenda Priest
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Glenda Thomas
Glenis Biddle
Glenn Elliott
Glenn Wilson
Glenys Woods
Gloria Byron
Gloria Hopkins-Smith
Gloria Pearce
Glyn Foulkes
Glyn Taylor
Glynis Abbotts-keen
Glynis Boucher
Glynis Milson
Gordon Beckmann
Gordon Beresford
Gordon Brodie
Gordon Cockroft
Gordon Crapper
Gordon Green
Gordon Hodgson
Gordon Lofthouse
Gordon Pattie
Grace Brennan
Grace Brown
Grace Garvey
Graeme Clement
Graeme Draper
Graeme Edminson
Graeme Leith
Graeme Walker
Graham Ball
Graham Bishop
Graham Bosson

Graham Brett
Graham Burke
Graham Busby
Graham Chandler
Graham Cliff
Graham Dargonne
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Graham Hustwit
Graham Keep
Graham King
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Graham Louer
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Graham Rankin
Graham Sharples
Graham Sherwood
Graham Small
Graham Tennant
Graham Vickers
Graham Waldren
Graham Wardle
Graham Whittle
Graham Willoughby
Graham Wilson
Graham Woods
Grahame Prower
Grant Lewins
Grant Sorrell
Granville Burn
Greg Sayers
Greta Meredith
Greta Pasteiner
Gudrun Lehmann-Shanks
Guy Busher
Guy Coakley
Guy Eades
Gwen Easter
Gwen McConnachie
Gwyn Jones
Gwyn Newing
Gwyneth Benn
Gwyneth Booker
Gwyneth Francis
Gwyneth Hinkins
Gwyneth Rushton
H Davidson
H Helton
Hally Hardie
Hamish Critchell-Ward
Hamish McDonald
Hannah Bale
Hannah Buckingham
Hannah Davies
Hannah Green
Hannah Roberts
Hannah Taylor
Hannah Terrey
Hannah Wakley
Harold Holding
Harriet Faithfull
Harry Manfield
Hayden Gabriel PhD
Haydn Keeton
Hazel Booth
Hazel Clark
Hazel Croft-Phillips
Hazel Edmondson
Hazel Fotheringham
Hazel Gawn
Hazel Irmak
Hazel Makepeace
Hazel Mallon
Hazel Van Rooyen
Heather Allen
Heather Ballinger
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Helen East
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Helen Gabriel
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Helen McNamara
Helen Morgan
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Helen Pierpoint
Helen Pinkney
Helen Preston
Helen Redpath
Helen Rose
Helen Rush
Helen Russell-Johnson
Helen Salsbury
Helen Sayers
Helen Smart
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Helen Tindale
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Helena Roche
Helene Zierl
Henry Badman
Henry Davies
Henry Shue
Henry Stuart
Hermine Baldwin
Hermione Dawson
Hilary AuduS
Hilary Bagshaw
Hilary Bridgewater
Hilary Canto
Hilary Clayton
Hilary Davies
Hilary Elliott
Hilary Felice
Hilary Hickmore
Hilary Malyon
Hilary Marshall
Hilary May
Hilary Miles
Hilary Place
Hilary Rivano
Hilary Sharman
Hilary Stephens
Hilary Wyre
Holly Gray
Holly Palmer
Howard Crouch
Howard Darkin
Howard Haynes
Howard Jessett
Howard Leader
Howard Pugh
Howard Snell
Howard Williams
Hugh Harrison
Hugh McMullan
Hugh Pead
Hugh Sharkey
Hugo Hodge
Ian Abbotts
Ian Alderson
Ian Allen
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Ian Challis
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Ian Shore
Ian Simm
Ian Sparling

Ian Swanson
Ian Tarrant
Ian Thorp
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Ian Watson
Ian Williamson
Ian Woolgar
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Ingrid Fulker
Ingrid Williams
Ingrid Winter
Ioana Beevers
Ira Ward
Irene Boz
Irene Cann
Irene Coward
Irene Evason
Irene Pearce
Irene Restall
Irene Robson
Irene Walker
Isabel Clare
Isabel Evans
Isabel Richards
Isabel Styles
Isabella Cloke
Isla Defty
Isobel Collyer
Isobel Dearman
Isobel Doubleday
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Jack Medley
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Jackie Beeney
Jackie Brown
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Jackie Cleveland
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Jackie Day
Jackie Duffin
Jackie Garland
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Jackie Hutchings
Jackie Jones
Jackie Mellan
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Jackie Rynn
Jackie Telfer
Jackie Willcox
Jackie Williams
Jacky Edwards
Jacky Fry
Jacky Mattam
Jacky Mercury
Jacky Thomas
Jacky Wallbridge
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Jacqueline Asquith
Jacqueline Bacchus
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Jacqueline Coppin
Jacqueline D'Auban
Jacqueline Foster
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Jacqueline Kirk
Jacqueline Littlechild
Jacqueline Munday
Jacqueline Parker
Jacqueline Stokes
Jacqueline Woolmington
Jacqui Matthewson
Jacqui Smith
Jacqui Sutton
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Jacquie Hibbert
Jacynth Lyes
Jade Landeg
James Abbott
James Andrew
James Canavan
James Dickinson
James Douglas
James Haddow
James Parker
James Pentelow
James Quinn
James Reid
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James Shepherdson
James Smith
James Swinscoe
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Jan Atkinson
Jan Bartlett
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Jan Cardew
Jan Cloudsdale
Jan Da Luz Vieira
Jan Dixon
Jan Gerrard-Wright
Jan Green
Jan Harvell
Jan Hirst
Jan Hood
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Jan Mayes
Jan Peet
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Jan Summers

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Jan White
Jancis Ham
Jane Allen
Jane Allport
Jane Antcliff
Jane Ayres
Jane Bawn
Jane Berry
Jane Birdsey
Jane Bowers
Jane Broughton
Jane Burnett
Jane Cameron
Jane Chatters
Jane Clark
Jane Cleaver
Jane Crownshaw
Jane Davies
Jane Dick
Jane Dugdale
Jane Edgar
Jane Evans
Jane Fearn
Jane Fitzmaurice
Jane Foxon
Jane George
Jane Glenton
Jane Gorman
Jane Gurnett
Jane Haynes
Jane Heany
Jane Henderson-Hirst
Jane Kirkwood
Jane Knight
Jane List
Jane Loney
Jane Lucas
Jane Minshall
Jane Monk
Jane Nash
Jane Nimmo-Smith
Jane Oldfield
Jane Ough
Jane Owens
Jane Parnell
Jane Pate
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Jane Richards
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Janet Antrobus
Janet Ashworth
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Janet Avarne
Janet Bartley
Janet Baxter
Janet Bruce MacIntyre
Janet Bullock
Janet Carlsson
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JANET CONSIDINE
Janet Cooper
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Janet Crosley
Janet Curl
Janet Deane
Janet Dennis
Janet Ettershank
Janet Fleming Rose
Janet Forgan
Janet Graves
Janet Hayman
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Janet O'Donnell
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Janey Simpson
Janice Barnett
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Russel Field
Russell Hogg
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Sally Talbot
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Sally-Anne Adkins
Sam Butler
Sam Cookson
Sam Devine-Turner
Sam Harris
Sam Harvey
Sam Mackenzie
Sam O'Brien
Sam Swanwick
Samantha Austin
Samantha Faircloth
Samantha Macauley
Samantha Poland
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Samantha Reeve
Samantha Richardson
Samantha Walker
Samuel Dyason
Samuel Gurney
Samuel Peter Francis

Sandi Atherton
Sandi Short
Sandra Alderman
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Sandra Christine Hunt
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Seamus Walsh
Sean Bothwell
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Sebastian Taylor
Selina White
Selma Scott-Hayward
Seraphina Lancaster
Serena Ranieri
Seth Huseyin
Shae Withers
Shan Lloyd-Packer
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Simon Parsons
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Simon Tucker
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Simon Woolfries
Simone Burke
Sinead Thornton
Siobhan Clifford
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Sonia Cameron
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Sonia Upton
Sonya Burton
Sophia Christie
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Sophie Thwaites
Sophie Woodward
Sophie Wooton-Lee
Sophie Xi-Zeta
Spencer Dawson
Stacy Cubitt
Stacy Kain
Stan Goodwin
Stanley Hermann
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Susanna Bishop
Susanna Candlin
Susannah Parker
Susanne Clark
Susanne Davis
Susanne Whiting
Susie Copsey
Susie Dickinson
Susie Leavy
Susie Wright
Suzanna Hooper
Suzanne Biddlecombe
Suzanne Chatterley
Suzanne Fallon
Suzanne Flanegan
Suzanne Haselton
Suzanne Kennedy
Suzanne Lewis
Suzanne Melville
Suzanne Morris
Suzanne Snushall
Suzanne Travis
Suzette Domeisen
Suzette Lang
Suzi Ellingham
Suzy Turner
Svetlana Orriss
Sybil Godden
Sylvia Bain
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Sylvia Burnside
Sylvia Cornell
Sylvia Crossley
Sylvia Holdforth
SYLVIA KNIGHT
Sylvia Murphy
Sylvia Neumann
Sylvia Roberts
Sylvia Scott
Sylvia Tilley
Sylvia Trusler
Sylvia Tully
Sylvia Turner
Sylvia Wills
Sylvie Beauvineau
T Lewis
T Wood
Tam O'Malley
Tamara Colloff-Bennett
Tamara Lee
Tamara Morrison
Tamaris Lever
Tamsin Ashton
Tamsyn Blaikie
Tania Green
Tanith Knox
Tanya Beachus
Tanya Jukes
Tanya Kirk
Terence Jones
Terence Munday
Terence Watkins
Teresa Bowden
Teresa Colquhoun
Teresa Feather-Kempster
Teresa Frearson
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Terina Notz
Terry Boyd
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Terry Crow
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Terry Jaques
Terry Joy
Terry Mayo
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Terry Osborn
Terry Reynold
Terry Sankey
Terry Saville
Terry Sessford
Terry Sharman
Terry Stevenson
Thea Nicholls
Theodora Ford
Theresa Hastings
Therese Lenihan
Thomas Agombar
Thomas Moulson
Thomas Plummer
Thomas Riley
Thomas Scarff
Thomas Simcock
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Tim Blyth
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Tim Constantine
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Tim Hogarth
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Tim Kitts
Tim Rutter
Tim Sheerman-Chase
Tim Tim McInnerny
Tim Wombell
Tim Young
Timi Van Houten
Timothy Fison
Timothy Hall
Timothy Horten-Smith
Timothy Lee
Timothy Pye
Timothy R Maberly
Tina Ambury
Tina Baker
Tina Campbell

Tina Davis
Tina Grace
Tina Harris-Ross
Tina Keeble
Tina Lucy
Tina Mant
Tina Rae
Tina Robertson
Tina Smith-Weston
Tina Williams
Tina Wood
Tiziana Romagna
Toby Elliott
Tom Biddulph
Tom Cleverley
Tom Cutler
Tom Gilchrist
Tom Mulrenan
Tom Nuttgens
Tom Steckiw
Tom Thurston
Toni Watkins
Tony Banks
Tony Bodle
Tony Chafer
Tony Croft
Tony Dawson
Tony Gellett
Tony Hallas
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Tony Hulls
Tony Jupp
Tony Moore
Tony Morgan
Tony Smith
Tony Stokes
Tony Stoneley
Tony Thorpe
Tony Wainwright
Torfrida Wakley
Tracey Boughtflower
Tracey Brickell
Tracey Hudson
Tracey Jolliffe
Tracey Kinns
Tracey Lang
Tracey Lewis
Tracey Nicholson
Tracey Weston
Tracy Anderson
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Tracy North
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Tracy Weeks
Tracy Weller
Tracy West
Trevor Bending
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Trevor Pritchard
Trevor Sharpe
Trevor Spall
Trevor Williams
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Tricia Mulcahy
Tricia Rice
Tricia Walsh
Trina Howe
Trish O'Brian
Trish White
Trisha Lewis
Trixie Clifford
Trudi Needham
Trudy Smith
Tyler Redford
Ursula Shannon
V Eccles
V Kim Fox
Vahe Bastian
Val Berry
Val Crawford
Val Gayter
Val Reader
Val Symons
Val Thompson
Val Ward
Valentina Recla
Valerie Amison
Valerie Campbell
Valerie Cunningham
Valerie Dunn
Valerie Elsworth
Valerie Fitch
Valerie Goldsworthy
Valerie Malley
Valerie McClean
Valerie Moore
Valerie Potts
Valerie Stebbing
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Valerie Warne
Valerie Wheeler
Vanessa Beynon
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Vanessa Mitchell
Vanessa Neat
Vanessa Schofield
Vanessa Setford
Vanessa Townson
Vaughan Pearce
Vaughan Woodcock
Vav Simon
Vee Cork
Vera Keohane
Verena Rees
Verna Milford
Veronica Brown
Veronica Hamilton
Vicki Hall
Vicki Shingler
Vicki Wheeler
Vickie Heaney
Vicky Ley

Vicky Rushworth Holt
Victor Machin
Victoria Bridger
Victoria Hawley
Victoria Hearsey
Victoria Hess
Victoria Lightfoot
Victoria Reed
Victoria Sharman
Vikki Lyons
Vinny McLean
Viola Langley
Virginia Bell
Virginia Lewis-Jones
Virginia Livingstone
Virginia Neary
Virginia Tam
Virginia Watts
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Viv Edwards
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Vivien Filleul
Vivien Pollock
Vivien Rylands
Vivien Vincent
Vivienne Catlin
Vivienne Davies
Vivienne Everett
Vivienne Hein
Vivienne Ironside
Vivienne Littlechild MBE JP
Vivienne Sherman
W Warrington
Wanda Barnes
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Warren Yabsley
Warwick McDonald
Wendie Pitts
Wendy Atkinson
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Wilma Radford
Winny Boerman
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Y Ross
Ylena Ryan
Yolanda Duncan
Yvette Jane
Yvette Jones
Yvette Rooke
Yvonne Dean
Yvonne Doore
Yvonne Gardner
Yvonne Launder
Yvonne Light
Yvonne Rissone
Yvonne Trigg
Yvonne Wiggett
Zack Dearie
Zoe Moore
Zoe Seenan
Zoe Thomas
Zoie Perkins
Zora Majeed

Appendix 2: Summary of main issues raised pursuant to the Regulation 18 Portsmouth Local Plan 2038 and how they were taken into account in the Portsmouth Pre-Submission Local Plan 2024

Draft Vision, Objectives and Key Themes

Vision and Objectives

A2.1 The vision for the future of the City was developed through the Imagine Portsmouth 2040 project, with input from local agencies, businesses and residents during 2019/20 and was adopted by the Council in 2021.

1a. Do you agree with the use of the Imagine Portsmouth draft vision and objectives to lead the new Local Plan?	
	No. of respondents: 88
Yes	56
No	13
Not sure/don't know	14
1b. Do you agree with the proposed key themes?	
No. of respondents: 50	

1b) Do you have any further comments or suggestions about the use of the Imagine Portsmouth draft version and objectives?

A2.2 While there was general support for the Imagine Portsmouth[1] vision and objectives, some found the details difficult to locate, too vague or complex.

A2.3 There were considered to be some contractions between the green aspirations for the City and proposals for development, such as development at Tipner. It was suggested that the Green City objective include reference to improving water quality and acknowledge biodiversity declines.

A2.4 A housing focused objective was suggested given the dominant issue of the issue for planning in Portsmouth, to seek a sustainable balance for the constraints of the City and it was requested that addressing impacts of climate change (and reducing carbon footprint) should be given more prominence or made a priority objective.

A2.5 Comments also wanted to see the following recognised: importance of good design, the critical importance of improving public transport to enable these aims, getting a 'good start' (youth and sure start services) and monitoring of health and well-being.

[1] More information at: https://imagineportsmouth.co.uk/

A2.6 There were a number of comments relating to the spatial developing strategy for the City such as: opposing housing targets; the need to fully utilise other brownfield sites (other than Tipner); more high rise development in appropriate locations; preventing further student accommodation; and more community infrastructure instead of greater housing numbers.

Vision and Objectives - Interim Council response

There is overall support for the vision and objectives with some concern on how these aspirations will be balanced.

Amendments can be made to include reference to the issues raised, all of which fall within the overall objectives and the Local Plan's draft policies. Consideration will be given on how to best promote/ communicate the Plan's guiding vision and objectives.

Review Status: **Green**

Vision and Objectives - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- The Imagine Portsmouth 2040 Vision forms the Vision for the Pre-Submission Local Plan and is set out in full along with six objectives in chapter 2.
- In order to provide clarity and show how the Local Plan seeks to implement the Vision the icons for the six objectives are set out for each policy of the Plan. For, example, the Strategic Site allocation of Tipner East with its proposed new homes and transport interchange seeks to deliver 'a healthy and happy City' and 'a City with easy travel.' An example of a City-wide policy delivering on the objectives is the strategic policy PLP40: Biodiversity Net Gain, which seeks to deliver on 'greening the City.'
- Housing is covered by the 'healthy and happy' objective as follows: 'All our residents and communities live in good homes where they feel safe, feel like they belong, and can thrive.' No change was made to make housing a standalone objective.
- Design is not mentioned in the Vision, but its importance is recognised by it being addressed by a core policy, which is the first policy in the Local Plan.
- Public transport is covered by the objective 'a City with easy travel.'
- The objective 'a City of lifelong learning' references young people.
- Health and wellbeing is addressed by the objective 'a healthy and happy City.' Monitoring and review is covered in chapter 12.
- The comments on meeting housing need are addressed under the housing policies.

Key Themes

A2.7 The aim of the proposed 'key themes' was to highlight the major issues for the future of the City (in so far as these can be influenced by matters relating to the built environment) that could be more comprehensively achieved through integration throughout the Local Plan, rather than through a single issue policy.

2a. Do you agree with the proposed key themes?	
	No. of respondents: 80
Yes	53
No	8
Not sure/don't know	18
2b. Do you agree with the proposed key themes?	
No. of respondents: 46	

2b. Do you have any further comments or suggestions about the proposed key themes?

A2.8 General support from consultees on these themes that will be fundamental for ensuring high quality development is delivered that captures the challenges that face the City**.**

A2.9 A few respondents found them too vague or generic, lacking clear commitments, or were unclear how they linked to the overall vision. **Portsmouth Climate Action Board** commented that the key themes need to be supported by agreed SMART carbon reduction targets for the City. Others thought they were ideal but unattainable for Portsmouth. The conflicts between air quality improvements and becoming a Freeport/ cruise ship destination were noted.

A2.10 It was also suggested that the climate change theme should be the primary key theme, and that it could be amended to "Delivering Net Zero Carbon Emissions in Development Planning to Tackle Climate Change". Carbon capture and protection of existing carbon stores (such as wooded areas, grasslands and the Tipner West mudflats) should be included in this.

A2.11 There were some alternative key theme suggestions, including: the need to support local business and the local community**;** supporting local people; economic growth; that environmental concerns (inc. air quality) should drive the whole Plan; to include reference to the biodiversity crisis; prioritising public transport; protecting heritage/ culture/ tradition or aesthetics; addressing flooding; protecting green space; education and youth provision; including air quality under the other themes; transport and air quality as a guiding theme; and the **RSPB and Hampshire & Isle of Wight Wildlife Trust** request that tackling the nature emergency and restoring ecological networks is a key stand-alone theme.

Key Themes - Interim Council response
The inherent challenges of planning for sustainable development and addressing competing priorities within the constraints of the Portsmouth area are acknowledged in *Chapter 1.1. Portsmouth Profile*. All alternative/ additional key themes are very valid suggestions and have been largely covered by the specific draft policies in the Plan. Further consideration will be given to how the key themes are presented/ strengthened and linked throughout the Plan. A definition of 'sustainable development' in the Portsmouth context and the links to wider sustainability goals could be added for clarity
Status: **Green**

Key Themes - Regulation 19 2024 Council response
How the representations have been taken into account in the Pre-Submission Local Plan 2024: • The Local Plan Key Themes were not carried forward to the Pre-Submission Local Plan 2024. Instead, these were addressed by individual policies. For example, Policy PLP35 addresses air quality and pollution.

Spatial Development Strategy

A2.12 The draft Spatial Development Strategy seeks to guide the future location, pattern, and form of development in Portsmouth.

3a. Do you agree with the approach to the proposed Spatial Development Strategy for the new Local Plan?	
	No. of respondents: 80
Yes	26
No	18
Not sure/don't know	31
3b. Do you have any further comments or suggestions about the Spatial Development Strategy for the new Local Plan?	
No. of respondents: 59	

A2.13 **Hampshire County Council** and Barton Wilmore on behalf of **PJ Livesey** and **NHS Property Services**, **Woodland Trust** and **Home Builders Federation (HBF)** broadly support the approach. The **HBF** does note that if the Council decides not to proceed with the full allocation at Tipner, it would need to consider where else housing need could be met and the likely impact on the ability to address its needs for affordable housing and support the ambitious levels of economic growth outlined

by both the Solent LEP and Partnership for South Hampshire. **Savills,** while supportive, note that the NPPF requirement for 30 year vision for large scale development should be recognised for development at Tipner.

A2.14 Comments, both positive and negative, emphasise that the need to protect green/ open space should be an overriding principle.

A2.15 In terms of air quality, it was contested that the strategy proposed/ Local Plan policies would be able to address the existing levels of air pollution or improve health and well-being, citing that the requirement for Health Impact Assessment only addresses new development and the Clean Air Zone does not cover some of the worst affected areas.

A2.16 Another key theme was the importance of transport link improvements for the success of the strategy. A more evident consideration of how those less able bodied or with SEND needs move around the City was also requested.

A2.17 **Stephen Morgan MP** wanted to see an alternative approach to housing, believing that the Government set targets were unattainable, and seeking to meet them would produce an unsustainable pattern of development which would exacerbate existing socio-economic and environmental problems.

A2.18 There were also some objections from other respondents due to either the proposed number of new homes or the addition of any new homes in the City (inc. student development), or due to the inclusion of particular proposed strategic site allocations. Particular reference was made to negative consequences of additional homes on air pollution and pressure on green spaces and infrastructure. There were also some objections based on the perceived 'conflicts' within the spatial strategy e.g. protecting green space vs. proposing development on open space at Tipner and St James' & Langstone Campus.

A2.19 Alternative suggestions received:

- Spatial strategy would ideally be led by the 15 min neighbourhood principle.
- Focus development strategy more on tall buildings given space constraints.
- More emphasis on regeneration opportunity at the seafront and specific sites (e.g. Fort Cumberland).
- Acknowledgement should be made of the allocations to enable needed sea defences (e.g. Tipner).
- Support Plan objectives through a 'rail-loop' from the 'Town' Station northwards to the Port and beyond to the mainland running alongside the M275 towards Lakeside and Cosham to join the mainline from Southampton/Bristol to Brighton.

A2.20 Some respondents reported being confused by the proposed spatial strategy, including the terms and language used. A desire for further explanation and maps was expressed. It was considered that terms such as 'accessible' and 'sustainable development' should be defined in the context of the Local Plan. It was noted that some employment areas are missing/ less visible.

Spatial Development Strategy - Interim Council response

The overall approach was largely supported, with some disagreement on 'guiding principle(s)' or objections relating to the proposed number of new homes. Minor amendments will be made for clarity, including the maps.

The proposed spatial strategy may need to the reassessed if there is any significant change to proposed strategic site allocations.

Review Status: **Green (pending further assessment)**

Spatial Development Strategy - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- The development strategy was re-worded in the Pre-Submission Local Plan to make it clearer and more succinct. It is set out in chapter 3 as follows: 'The development strategy for Portsmouth from 2020 to 2040 is to maximise the potential of developable sites focusing on the strategic sites whilst addressing the climate emergency, greening the City and achieving high quality design.'
- The map of the City that formed figure 3 of the Reg 18 Plan has been replaced by the key diagram in figure 3.1. The key diagram shows the island geography of the City and the drivers behind the development strategy and individual policies.
- Comments on the housing target are addressed under the housing policies.
- Comments on the allocation of Tipner are addressed under the Tipner policy.
- All open space is protected by Policy PLP45: Open Space
- Although the Local Plan does not reference the 15 minute neighbourhood principle, Portsmouth is a very small and densely populated City in which most people live within 15 minutes' walk of key services.
- Areas for tall buildings are identified in Policy PLP1: Design and different density zones are covered by Policy PLP21: Residential Density.
- Southsea Seafront is recognised in the supporting text of Policy PLP30: Cultural and Visitor Economy as an existing major cultural and visitor attraction.
- Fraser Range which is adjacent to Fort Cumberland is allocated for development under Policy PLP13.
- The need for new sea defences is referenced as necessary for the allocated sites such as Tipner West and Fraser Range.
- There are no plans for a new railway loop and so it cannot be included in the Local Plan or the Infrastructure Delivery Plan.

Housing

H1 Housing Need and Supply

A2.21 Delivering housing to meet the needs of a growing City is a key requirement for the new Local Plan. Portsmouth currently has a total housing stock of 89,800 homes (as of May 2021); of these 52,882 (58.9%) are owner occupied, 19,738 (22%) are private rented, 10,080 (11.2%) are council rented and 7,100 (7.9%) are Housing Association homes.

A2.22 The Government's aim is to significantly boost the supply of new homes in order to address the country's growing and ageing population as well as the existing deficiency from past undersupply of suitable homes. National policy states that the minimum number of new houses to be planned for should be determined in two ways: by local housing need and using the Government's standard method, unless exceptional circumstances justify an alternative approach in-line with current and future demographic trends, and market signals.

A2.23 The Council has undertaken a detailed review of land within the City, in accordance with the requirements of national planning policy and guidance, to consider its potential to deliver further housing for the period 2020 – 2038. The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy H1.

4a. Are there exceptional circumstances (to justify an alternate approach) for Portsmouth that should be considered?	
	No. of respondents: 133
Yes	115
No	11
Not sure/don't know	7
4b. If answered yes to 4a., please tell us more about these exceptional circumstances	
	No. of respondents: 120

A2.24 The responses received in relation to Question 4b included the physical geography of Portsea Island and the constrained availability of development land as the main constraint. They also highlighted a variety of further issues caused by the lack of space, including traffic and parking problems, lack of infrastructure, including difficulty of accessing doctors and schooling. Potential pollution issues were also highlighted. The impact of further housing on the City's open space and environment were highlighted as a drawback from significant housing provision in a small area like the City. The government's target 'ignores our special circumstances'. The City is only 15sqm with a current housing stock of 89,800; a further 17,701 would increase the stock by almost 20%.

5a. Do you agree with the suggested approach to housing supply for the plan period?	
	No. of respondents: 123
Yes	26
No	71
Not sure/don't know	26
5b. Do you have any further comments or suggestions about the suggested approach to housing supply for the plan period?	
	No. of respondents: 90

A2.25 The responses to Question 5b showed that there was a wide range of opinion on the best approach to housing provision in the City. Some felt that areas such as the City Centre and Tipner could accommodate more development, whereas others felt that there was too much development proposed (on the whole more people were concerned about Tipner's environmental impact, whereas more people were supportive of the City Centre and increasing development there). Both increases and decreases in tall building provision were suggested, as well as increased and decreased levels of affordable housing. A number of site specific comments on small sites were given, and a general concern was shown for ensuring that sufficient infrastructure was provided to support the proposals.

A2.26 In addition a number of specific email responses were received, these reflected the points received through the general consultation, and added a number of additional specific points:

Objections to the Government's housing target, and indication that PCC should look to reject it due to exceptional circumstances:

A2.27 **CPRE Hampshire:** For Portsmouth the difference in household projections is significant, with a much lower target from using the 2018 projections, only around 379 dpa, the City Council should use this as the basis.

A2.28 **Milton Neighbourhood Planning Forum:** The proposal to build 17,701 new dwellings is excessive and unacceptable. As the Plan acknowledges, this is Central Government's assessment of housing need and ignores local constraints and deliverability. There are in Portsmouth 'Exceptional Circumstances' including its geography; its minimal size and currently highly 'densified' and urbanised character; the congestion and pollution; the high levels of existing deprivation and the lower life expectancy rates; the Conservation of Habitats imposed by Statute and International Law; the extreme paucity of open-spaces; and the whole transport inefficiency in trying to access anywhere easily whether on foot, cycle or in a vehicle.

A2.29 **Climate change action group:** The central Government housing target is not suited to the geography and population density of our City for a number of reasons: there is a lack of land to build on and recreational pressure on the small amounts of green space; the City has over 20% of its area within Flood Zones 2 or 3; the Council

should not be damaging protected sites in our harbours to add land mass. Given the Tipner West 'super-peninsula' proposals make up nearly 20% of the housing target it is apparent that the Council is unable to meet the Government's standard method calculations without causing serious environmental harm, including the substantial loss of designated habitats of international importance. The critical levels of air pollution in our City, mean we can't afford to add more pollution from private cars. We already have an acute lack of dentist, GP & hospital availability.

A2.30 **Portsmouth Labour Group:** We reject outright the Government's proposed housing targets for Portsmouth and believe there is a compelling case to be made that issues of land supply and environmental constraints within our local authority area justify a smaller target being included within the local plan. As an island City, Portsmouth has unique and obvious limits to the area available for development. Where brownfield land exists it should be allocated for significant development however green spaces should be protected. In particular, areas designated as of substantial environmental significance, such as the Portsmouth Harbour Site of Special Scientific Interest (SSSI) should not be considered for development under any circumstances. The existing issues of nitrate and air pollution in the City mean that any development which exacerbates these problems should not be allowed. In addition, any additional pressure placed on traffic and transport systems must be accompanied by a step change in the provision of green public transport and active travel infrastructure to enable reduced reliance on private motor vehicles.

A2.31 **Stephen Morgan MP:** The Local Plan commits to Portsmouth to building 17,357 dwellings between 2020 and 2038, or 964 per annum. These inflated targets are totally unsustainable and bear no relation to the reality on the ground.

A2.32 **Ann Terry (resident)** - Sewage discharge into the Solent is a health hazard and 17k new properties will only exacerbate an appalling situation.

Agree with the Government's housing target:

A2.33 **Homes England:** We welcome the Council's Draft Development Strategy and direction of growth to strategic sites in accordance with Figure 3 of the emerging Local Plan. Given, the undersupply of housing, however, with City boundaries we recommend modifications to draft Policies S5: draft St James' and Langstone Campus and H5: Density to allow greater flexibility for optimisation of limited strategic sites and brownfield supply.

A2.34 **Bellway Homes:** The emerging Portsmouth local plan should calculate housing need in line with Government guidance and the standard method. Despite its constrained location, there is a clear need to build more housing in Portsmouth. Providing housing at the levels identified in Policy H1 will enable the City to continue to grow in a sustainable manner and provide both market and affordable homes to families and the wider community.

A2.35 **Savills for PCC strategic developments:** The NPPF expects strategic policy-making authorities to follow the standard method for assessing local housing need, and it uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic undersupply.

A2.36 **Southern Housing Group:** Welcome the ambitious and imaginative approach the Council have taken to the challenges of developing affordable homes sufficient to meet existing housing need and projected need of 17,701. We also acknowledge the real difficulties in developing on the island of Portsmouth and in delivering the proposed 16,933 new homes set out in the draft plan.

A2.37 **Persimmon Homes:** Whilst there are no exceptional circumstances to justify a reduction in housing need the Council should consider whether further housing growth may be necessary in order to support the economic growth aspirations for the City and wider South Hampshire area, of which Portsmouth is a major driver of growth. It will be necessary for the Council to consider whether any growth deals or infrastructure improvements planned for the area could lead to the need for a higher housing requirement than the minimum established using the standard method.

Commentary on the approach to calculating the number:

A2.38 **Eastleigh Borough Council:** We note that the Partnership for South Hampshire (PfSH) is currently preparing a revised development strategy to cover an additional two year period up to 2036 which will identify an additional unmet housing need of c.13,000 new homes by 2036 across the PfSH sub-region. We further note that the Regulation 18 Consultation Document references that a possible contribution of 1,000 units from other local authorities has been retained while Duty to Cooperate discussions continue and as Portsmouth's final unmet need housing figure is determined.

A2.39 **Southampton City Council (SCC):** confirm its continued support for the development of the new Portsmouth Local Plan. Portsmouth plan to work with other authorities to deliver their housing supply with a potential contribution of 1,000 homes supplied under the Duty to Cooperate, both unilaterally and through the Partnership for South Hampshire. Whilst SCC's supply of housing sites is not yet finalised, the latest Statement of Common Ground (October 2021) indicates that Southampton is likely to have a significant unmet need and is working with other local authorities under the PfSH partnership to help accommodate any unmet need. As such, SCC would like to reiterate the importance of a coherent and interconnected approach to development across the Solent region and support the option of meeting supply through a cross-boundary distribution of housing.

A2.40 **Fareham Borough Council:** pleased to see the ambition shown by the City Council In planning to meet its housing need. The first approach should be to exhaust all possible avenues to meeting the need. Fareham Borough Council awaits the outcome of the Partnership for South Hampshire work on cross boundary distribution of housing, but ahead of the publication of that work has committed to providing 900

dwellings (plus a buffer of 11%) towards sub-regional unmet need through the Fareham Local Plan 2037. The Borough Council notes that no mention is made in the Portsmouth Plan of where the Council envisages unmet need being located, other than a Partnership for South Hampshire contribution, but Fareham Borough Council is confident that the contribution of 900 (plus buffer) towards sub-regional unmet need is justified and evidenced, and that no more can be provided within the borough and that this approach will be found sound through the upcoming Local Plan Examination in Public.

A2.41 **Isle of Wight Council (IWC):** IWC are currently planning for a housing number that is lower than the Government prescribed standard method for the island. This leaves an element of 'unmet need' which, through our Duty to Co-Operate discussions, we are exploring whether could be met in a sustainable way by any local authorities in areas that benefit from direct ferry connections. We note Table 2 on page 33 and Table 3 on page 35 of the document that highlight PCC will be seeking around 1,000 units of its identified housing need to be met from other local authorities within the PfSH area via other Duty to Co-Operate discussions. This re-iterates and confirms the position that PCC set out in response to our own Draft Island Planning Strategy (IPS) Regulation 18 consultation, namely that PCC would be unable to make any contribution to meeting any unmet housing need from IWC, a position that is accepted and understood.

A2.42 **Winchester City Council:** The Local Plan uses the 'standard method' to calculate its local housing need, which Winchester City Council supports. We are concerned by the addition of a 20% buffer in the first 5 years and 10% thereafter. This appears to be based on the application of NPPF paragraph 74 due to past under-provision against the Housing Delivery Test (paragraph 2.1.3, footnote 18) which we believe has been wrongly applied. We would wish to continue the discussion on housing need/ supply with Portsmouth City Council prior to the Reg 19 stage of the Portsmouth Local Plan, in addition to the on-going collaborative work on sub regional housing need and distribution and other strategic cross boundary matters with the PfSH authorities. There would be benefit in both authorities positively working together to agree a joint Statement of Common Ground on housing need matters and other key issues prior to submission of our respective Local Plans.

Policy H1: Housing Need and Supply - interim Council response

The responses to the Regulation 18 consultation have further highlighted the City's physical constraints and how it constrains the ability of the City to meet the targets as set out in the standard method.

The City Council needs to ensure that all potential options for housing accommodation have been considered, including all reasonable alternatives, in order to support a position which would not meet the full standard method requirement.

In preparation for its Regulation 19 consultation the City Council is carrying out the annual review of the Housing and Economic Land Availability Assessment to test the assumptions made for its housing land supply position, particularly the deliverability of the small site supply and the consultation comments received on the draft Strategic Sites. The Council is also continuing to work closely with its neighbours to see if any unmet need from the City can be accommodated outside of its boundaries.

The progression of this policy is linked to any changes in the supply position as the Plan progresses, including draft strategic sites, density proposals, planning permissions and completions and any contribution to the City's housing need through the Duty to Co-operate.

Policy Review Status: **Amber**

Housing Need and Supply - Regulation 19 2024 Council response

Under Policy H1 of the Regulation 18 Local Plan, provision for 17,701 net additional homes was anticipated, which was in line with the need identified through the Government's standard method. Whilst a number of respondents acknowledged and supported this ambitious target, the majority believed that the Government's identified need does not reflect the unique context of Portsmouth (such as its physical geography) and that the City has 'exceptional circumstances' which should be considered. In response to the above, exceptional circumstances were considered as part of the Housing and Economic Development Needs Assessment (HEDNA) for the Reg 19 Plan. Findings from the HEDNA indicate that both demographic trends and economic growth in the City would produce a lower need than the standard method. However, the above analysis was not deemed robust or unique enough to demonstrate exceptional circumstances and to steer away from the standard method. The Reg 19 Local Plan 2024 recognises that the physically constrained nature of Portsmouth, alongside other factors, has a great impact on land availability and housing delivery within the City. As a result, the housing requirement set under Policy PLP16 of the Reg 19 Local Plan 2024 is a 'capacity-based' target based on the level of housing that can be realistically achieved within the plan period, taking into account Portsmouth's constraints. The NPPF, as updated in Dec 2023, states that the outcome of the standard method is an advisory starting point for establishing a housing requirement. The City Council therefore considers that the housing target set in Policy PLP16 is both justified and consistent with national policy.

Under Policy PLP16 in the Reg 19 Local Plan 2024, the Council will make provision for at least 13,603 net additional homes during the plan period, which is 4,098 less than was anticipated in the Reg 18 Local Plan. This is due to the completion and analysis of the latest housing supply data from HCC and findings from the most recent Housing and Economic Land Availability Assessment (HELAA).

Sources of housing supply differ slightly between Policy H1 of the Reg 18 Local Plan and Policy PLP16 of the Reg 19 Local Plan 2024, which are outlined respectively in Table 2 and Table 6.1 and reflect the latest evidence from the HELAA.

Both policies include permissions within the housing supply. However, the base date for permissions outstanding has changed from 31 March 2020 under Policy H1 of the Reg 18 Local Plan to 31 March 2023 under Policy PLP16 of the Reg 19 Local Plan. This is based on the latest data received from Hampshire County Council.

Both policies include the equivalent contribution from C2 accommodation and student accommodation in the housing supply. However, Policy PLP16 of the Reg 19 Local Plan also includes additional sites that have been completed between 2020 to 2023 that have the capacity of 5 or more dwellings (305). The equivalent contribution from student accommodation is included in the 305 figure under Table 6.1 of the Reg 19 Local Plan.

In the Reg 19 Local Plan 2024, site allocations and HMOs have been included as new sources of housing supply. HMOs play a key part in housing delivery within the City,

which is evidenced in the HEDNA. The Plan's strategic, allocated and identified sites are supported by findings and assessment contained in the latest HELAA.

The addition of new housing supply sources in the Reg 19 Local Plan shows that the Council has sought to leave 'no stone unturned' in robustly and positively identifying all sources of potential housing supply.

Representations submitted by Eastleigh Borough Council, Winchester City Council, Southampton City Council and Isle of Wight Council all highlighted the importance of addressing unmet need through the Duty to Cooperate, either bilaterally (where applicable) or multilaterally through the Partnership for South Hampshire (PfSH). 800 homes have been included in the contribution from neighbouring authorities under Policy PLP16 of the Reg 19 Local Plan, which is 200 homes less than what was anticipated under Policy H1 of the Reg 18 Local Plan. This reflects what has been allocated in the Fareham Local Plan, which was adopted in April 2023. Fareham Borough Council (FBC) has also been acknowledged as the contributing authority, which was a query raised in the representations submitted by FBC. The Council is continuing to work with adjoining authorities and Statements of Common Ground (SCG) are currently underway to support the PLP.

Winchester City Council queried the addition of a 20% buffer in the first 5 years and 10% thereafter in the Reg 18 Plan. This is the result of PCC using the standard method to calculate its local housing need. The housing need has now been based on a 'capacity-based target' and thus, is not applicable to the Reg 19 Local Plan.

Both policies applied an under-delivery/non-implementation discount of 15% to the 'non-strategic sites/sites identified from the HELAA.' However, this discount was also applied to the City Centre sites under Policy H1 of the Reg 18 Local Plan, which has not been taken forward in Policy PLP16 of the Reg 19 Plan. Policy PLP16 also included a 15% discount to outstanding permissions to further ensure a pragmatic approach to the housing supply for the City.

H2 Housing Types, Mix and Affordability

A2.43 The Council has a housing target of 17,701 dwellings over the plan period to 2038. These needed homes could take the form of a range of different types and tenures of residential dwellings. The Council must establish what the need is for different types of residential accommodation and strive to ensure that everyone in Portsmouth has an opportunity to live in a decent home, which they can afford.

A2.44 National policy guidance states that strategic policies should be informed by a Local Housing Need Assessment, conducted using the standard method in national planning guidance. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This is including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service

families, travellers, people who rent their homes and people wishing to commission or build their own homes.

A2.45 The Local Plan 2038 Regulation 18 consultation sought views through a number of specific questions related to housing types mix, and affordability, including the approach to: family housing; self and custom-built housing; accessible and adaptable homes; older persons housing; specialist and supported housing; purpose built student accommodation; Build to Rent; and affordable housing.

6a. Do you agree with the proposed approach to: the provision of family housing; self and custom-built housing; accessible and adaptable homes; older persons housing; specialist and supported housing; purpose Built Student Accommodation; Build to Rent; and affordable housing?	
	No. of respondents: 873
Yes	494
No	139
Not sure/don't know	232
6b. Do you have any further comments or suggestions about the suggested approach to the provision of housing in Portsmouth?	
	No. of respondents: 86

A2.46 A wide variety of comments were received. A number of people supported high rise as the most obvious way to provide more homes in a City with limited land area, however it was felt that the design of high rise buildings needed to be improved; need to provide more 1 /2 bed units; provision for the elderly; provision for travellers; more lifetime homes; quality retirement homes needed for people to downsize into; vehicle share schemes for flat residents; ensure environmental standards for new homes (zero carbon).

A2.47 **Home Builders Federation:** The policy as currently worded provides the level of flexibility we would expect to see in a local plan where there are significant constraints on development. Without sufficient flexibility policies on housing mix may prevent some sites from coming forward as the expectation from decision makers is that the prescribed housing mix should be met on all sites. However, as set out in paragraph 34 of the NPPF, the policies in a local plan should not undermine the deliverability of the development proposed in that local plan. Therefore, if, as indicated in the viability assessment, over half of the typologies tested are unviable at the proposed policy costs then the policies should be adjusted rather than rely on negotiation at the application stage. Whilst negotiation will be a necessary fall-back position, as set out in policy H2, to ensure some sites come forward paragraph 58 of the NPPF makes it clear that this should be the exception not the norm and that decision makers should be able assume that where development meets all policy requirements in a plan then that development is viable.

Family housing

A2.48 General support with some reservations about the availability of land of sufficient extent to provide the 57% of new family homes desired.

A2.49 **Portsmouth Labour Group:** support the requirement for an appropriate share of family sized homes on new developments and emphasise the need for robust enforcement of this part of the policy, particularly on Council and housing association led schemes where this is not currently always the case.

A2.50 **PJ Livesey and NHS Property Services:** the draft policy to seek a proportion of family housing on development sites (3+ bed) is supported, as is the flexible nature of the policy which would allow the final housing mix to be negotiated on a site by site basis.

A2.51 **WSP:** Flexibility for provision of family housing should be provided when undertaking conversions of existing buildings to residential properties. In these instances, it is often not possible to provide family housing and in such cases the provision of one and two bed flats should be accepted. Request an amendment to the policy for conversions of existing buildings.

Self Build and Custom Housing

A2.52 Supported in principle but with some concern from housing industry on deliverability.

A2.53 **Home Builders Federation:** The significant constraints on development opportunities within Portsmouth and the higher densities that may be required indicate that there must be flexibility in how self-build home plots are delivered and not place unnecessary burdens on development.

A2.54 **Bellway Homes:** difficult to achieve in the City Centre and on proposed high density redevelopment sites (such as Tipner East), and the necessary housing density as required by local policy in general as it will be necessary to provide a significant proportion of residential units as flats. There should be an exception to the policy on this basis.

A2.55 **Portsmouth Labour Group:** support enabling of self-build and custom-build housing and encourage the local authority to consider allocating resource to looking at Community-led Housing schemes as a way of taking this, and affordable housing development more generally, forward.

Accessible and Adaptable Homes

A2.56 Draft policy proposes 20% of all new homes are built to part M4(2) and 5% of built to part M4(3).

A2.57 **PJ Livesey and NHS Property Services**: support the proposed approach in meeting the needs of the community and note that the proposals for St James's Hospital site can support these aspirations.

A2.58 **Home Builders Federation:** With regard to the evidence of need for the application of the higher 20% standard for M4(2), the Needs Assessment states that for current households where needs are affected by illness or disability only 9% are likely to need to move to a more suitable home. To therefore conclude that in future over half of those whose needs are affected by a disability or illness will need to move to a more adaptable home does not seem to be a robust or consistent assessment. However, agree with the Council's proposals of 20% of new housing to be delivered as part M4(2) (rather than 46%) which would seem a reasonable approach in view of the evidence and the broader concerns with viability in Portsmouth. With regard to M4(3) the Council will need to make the distinction between a wheelchair adaptable homes and wheelchair accessible home under part M4(3), as the PPG states that wheelchair accessible home can only be required through the local plan where the council has nomination rights for that house.

A2.59 **Portsmouth Labour Group:** support the accessible and adaptable homes part of the policy and again emphasise the necessity for robust enforcement of this.

Older Persons/ Specialist and Supported accommodation

A2.60 **McCarthy and Stone:** The plan does not plan positively for older persons accommodation, identified needs for specialist housing are not included as targets and the assessment is from 2019; a more thorough and up to date assessment is needed.

A2.61 **Home Builders Federation:** local plans should look to allocate specific sites to meet the needs of older people as a commitment to maintaining a supply of land to meet targets, in the most sustainable locations close to key services. Also consider identified needs/ a target should be included in the policy for Portsmouth. This would ensure needs are met over the plan period, enable effective monitoring of this target and encourage positive decision making if there is a deficiency in supply.

A2.62 **Vail Williams:** note that the Council has not sought to identify specific quantum of persons or specialist/supported housing that could be required. There should be detailed policy provision for the following, with a requirement to be located close to local facilities, services and easily accessible to sustainable transport:

- Community accommodation for mental health patients and other vulnerable people.
- Accommodation for mental healthcare services.
- Affordable housing for healthcare staff, from both UK and abroad.
- Key worker housing.

A2.63 **Portsmouth Labour Group:** support approach relating to elderly, specialist and supported housing as a way to ensure there are housing options appropriate for everyone.

Student Accommodation

A2.64 Many of the comments on student housing recognised that there is already sufficient student accommodation in the City and it was considered important such development could be repurposed for a different use if necessary.

A2.65 **Portsmouth Labour Group:** propose an additional clause is added to the part of Purpose Built Student Accommodation to read: "New development will only be supported where a clearly identified and evidenced need has been proven."

A2.66 **Home Builders Federation:** important to ensure that there is a robust assessment as to how many bed spaces in student accommodation it will take to release one home, if this is to be included in overall supply. Use of the position set out in the Housing Delivery Test Rule Book it is a national average and the ratio is likely to differ between areas. In some Local Planning Authorities, the density of students per house is likely to be significantly higher and will require far more bed spaces to free up one house. As such the Council should have robust evidence to support its approach in assessing the level of housing freed up by student accommodation.

A2.67 **Union for Planning:** graduates/ young professionals are wanting to stay in the area where they have trained or attended university, or move into the area, but do not have the financial ability (or desire) to purchase market housing, but also require additional independence and autonomy which would not be achieved through living in a house share. As such, Co-Living is an ideal product for such groups. Request that support for this tenure is included in the wording of policy H2 (as it is in the preceding paragraphs).

Affordable housing (including Build to Rent)

A2.68 There were both comments supporting more and less affordable housing contribution, both on and offsite for developers, however there was general support for the provision of more generally affordable housing, which is seen as Council built, owned and run stock, rather than other 'affordable' tenure types; more affordable housing of a kind similar to Council housing built in the past; local connections for housing raised. Provision of "Affordable homes should not be as easily circumvented by 'Viability Exclusions' because it raises 'Hope Value' to landowners and starts the whole avoidance or scaling down of delivery. Build to Rent schemes are a 'double edge sword'; unless more is done to cap excessive rent charges and service charges and to prevent greedy landlords and housing agencies could end up making this problem a lot worse.

A2.67 **Portsmouth Labour Group:** concerned that the Build to Rent element of the policy will be used by developers to circumvent provision of social/affordable rented affordable housing and encourage the Local Planning Authority to look at all options for minimising this possibility.

6c. Considering the conclusion of the Viability Assessment of the Local Plan there is a risk that the proposed 30% requirement for affordable housing (which would potentially be viable for less than half of expected developments in Portsmouth), is undeliverable. **Due to this risk, is there an alternative requirement for affordable housing provision that should be considered?**	
	No. of respondents: 106
Yes	37
No	14
Not sure/don't know	54
6d. If answered yes to Q6c., please tell us more about what you think this requirement should be.	
	No. of respondents: 52

A2.68 Out of 49 respondents to Question 6d**,** 11 responses specifically mentioned a percentage target, of these 6 thought it should be lower than 30% affordable housing with the majority saying the requirement should be 20%. 5 respondents said 30% affordable housing or higher, with the highest suggested being 50%. None suggested it should be less than 20%. Many of the respondents felt that there was too much flexibility for developers to not pay at all, and that assessment of viability work submitted needed to be robustly assessed. The need for genuinely affordable homes was in many of the comments, with questions being raised asking if first homes were truly 'affordable'.

6e. Due to the national requirement to provide 25% of new affordable homes as 'First Homes' and the viability challenges in Portsmouth, the proposed tenure split is of 70% affordable rent and 30% low-cost home ownership (incorporating the 25% First Homes requirement) what tenure split do you believe is most appropriate for Portsmouth?	
	No. of respondents: 103
The proposed split of 70% affordable rent and 30% low-cost home ownership is appropriate.	47
Less affordable rent and more low-cost home ownership	38
Less low-cost home ownership and more affordable rent	14
Not sure / other comment	4

A2.69 **Bellway Homes:** the policy should be altered to reiterate that the First Homes requirement should not apply to planning applications and housing sites which obtained planning permission (or where a right to appeal against non-determination has arisen) prior to 28th December 2021 and/or applications determined before 28 March 2022, provided that there has been significant pre-application engagement.

A2.70 **Portsmouth Labour Group:** delivery of affordable rented accommodation for those in greatest housing need should be maximised. In addition, it is important that this tenure split is actually enforced. The research on Shared Ownership and Help to Buy has found that most people accessing those schemes are on middle and higher incomes and therefore the benefits to those most in financial need are unclear. In fact these schemes arguably contribute to further inflating house prices, and First Homes seem likely to continue this trend.

A2.71 **National and Regional Property Group:** The affordable tenures proposed within policy H2 as part of the 30% on-site affordable housing requirement do not appear to have been tested by the evidence base. First Home tenures have a notably different cashflow profile when compared to traditional affordable housing tenures and will result in higher development finance charges, thus increasing overall development costs and negatively impacting viability. The true impact of First Homes, including a diluted sales market, does not appear to have been openly and transparently tested by the evidence base. Under the provisions of First Homes, the developer will bear 100% of the sales and build risk.

A2.72 **Home Builders Federation:** the impact of the requirement to provide First Homes as an affordable housing tenure does not appear to have been fully considered in the supporting Viability Assessment. First homes are fundamentally different to a shared ownership unit or affordable home for rent where the home is bought up front by a housing association with the developer in affect acting as a contractor. The risk is

lower as there is no need to put the affordable home on the open market, as such the developer accepts a lower level of profit. However, a First Home would be sold by the developer and as such they retain the risk and the other costs, such as marketing, in the same ways as they would for any home sold on the open market. Therefore, the proportion of new homes delivered as First Homes should be treated in the same way as other market homes for sale. The Council's approach would result in 9% of homes on a major development site as affordable home ownership product which is below the level required by national policy. In order to ensure that 10% of homes come forward as low-cost home ownership products the tenure split should be 65:35 rent to home ownership.

Support for 30% affordable housing threshold

A2.73 **Portsmouth Labour Group:** strongly support the retention of the requirement of 30% affordable housing on all large developments and encourage the Local Planning Authority and Housing Enabling Officer to continue doing all they can to maximise the delivery of affordable housing across the City. We would support a significantly higher minimum affordable requirement on sites owned by the Council.

A2.74 **McCarthy and Stone:** With regard to the proposed affordable housing policy, the ability for applicants to submit an open book viability assessment where schemes do not meet the 30% affordable housing requirement is supported. This is necessary in order to ensure that the plan does not undermine the delivery of much needed housing and for individual circumstances to be accounted for.

Support for 20% or an alternative affordable housing threshold

A2.75 **Abri homes:** the 20% affordable housing target recommended by the Viability Study is very low compared with the overall needs, and the Council's proposed raising of this threshold to 30% is welcomed as a sign of its support for delivery. However, this approach does not reflect the NPPF and PPG guidance that plan-making should be the 'last word' in viability testing, presenting realistic policies that will not cumulatively undermine deliverability: *Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.* PPG, Para. 002 Ref. ID 10-002-20190509.

A2.76 **Home Builders Federation:** considering the conclusion of the viability assessment of the Local Plan there is a risk that the proposed 30% requirement for affordable housing (which would potentially be viable for less than half of expected developments in Portsmouth), is undeliverable. This would therefore require frequent case by case viability testing. Due to this risk, they ask whether an alternative requirement for affordable housing provision should be considered. National policy and the Council's evidence would suggest that the affordable housing policy be amended to 20% in line with the recommendations in the viability assessment.

A2.77 **National and Regional Property Group:** Policy H2 does not conform with the recommendations made by the evidence base. The evidence base suggests that, based on current Community Infrastructure Levy (CIL) rates, a lower affordable housing target of 20% should be sought for schemes in high and medium value areas within the City. The evidence base concludes that sites in lower-value areas, and schemes of 6+ storeys, should have the ability to test site-specific viability. Consequently, the benchmark threshold of affordable housing within viability testing is 10% higher in emerging policy H2 for sites located within medium and higher value areas, and up to 30% higher for sites in lower value areas when compared to recommendations made by the evidence base.

A2.78 **Bellway Homes:** we support the approach in the consultation draft of setting a more challenging target, but our concern remains that the plan will not facilitate the delivery of sufficient affordable housing to meet local need. The viability review shows that sites in many areas of Portsmouth, including the City Centre, will not be viable if they make provision for 30% affordable housing.

A2.79 **Southern Housing Group:** The viability review shows that sites in many areas of Portsmouth, including the City Centre, will not be viable if they make provision for 30% affordable housing.

A2.80 **Persimmon Homes:** Policy H2 proposes that the provision of affordable housing should be 30%, unless otherwise agreed by the Council. Paragraph 34 of the NPPF states the policies in a local plan should not undermine the deliverability of the development proposed in that local plan. The draft Plan policies should be adjusted rather than rely on negotiation at the application stage. National policy and the Council's evidence would suggest that the affordable housing policy be amended to 20% in line with the recommendations in the viability assessment.

A2.81 **Home Builders Federation:** are concerned that the viability evidence does not full reflect the costs associated with delivering residential development in Portsmouth. The viability study uses the lower quartile BCIS build cost in relation to development in Portsmouth; the median would better reflect the cost of development moving forward in Portsmouth given the focus of Government on high quality design. Not all policy costs seem to have been included in the viability assessment; e.g. the costs of Council's electric vehicle charging requirements that Policy C3 states will be set out in the Parking and Transport SPD. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per EVCP plus any costs for upgrading local electricity networks. Under the Government's proposals should such upgrades be higher than £3,600 per EVCP then the delivery of charging points is not considered to be technically feasible. HBF believe the 5% allowance for abnormal costs is insufficient. These are the costs above base construction and external costs that are required to ensure the site is deliverable. Prior to the 2019 NPPF viability assessments have taken the approach that these cannot be quantified and were addressed through the site-by-site negotiation. However, this option is now significantly restricted by paragraph 58 of the NPPF, and it is necessary for abnormal

costs to be factored into whole plan viability assessment; they are often substantial and can have a significant impact on viability. They can occur in site preparation but can also arise with regard to the increasing costs of delivering infrastructure, such as upgrades to increase the capacity of utilities. Abnormal costs are higher on brownfield sites where there can be a higher degree of uncertainty as to the nature of the site and the work required to make it developable. If abnormal costs are high then it will result in sites not being developed as the land value will be insufficient to incentivise the landowner to sell. A significant buffer should be identified within the viability assessment to take account of these costs if the Council are to state with certainty that those sites allocated in the plan will come forward without negotiation.

2.82 **National and Regional property Group:** Policy H2 does not conform with the recommendations made by the evidence base. The evidence base suggests that, based on current Community Infrastructure Levy (CIL) rates, a lower affordable housing target of 20% should be sought for schemes in high and medium value areas within the City. The evidence base concludes that sites in lower-value areas, and schemes of 6+ storeys, should have the ability to test site-specific viability. Consequently, the benchmark threshold of affordable housing within viability testing is 10% higher in emerging policy H2 for sites located within medium and higher value areas, and up to 30% higher for sites in lower value areas when compared to recommendations made by the evidence base. It is evident from Table 10.2a, page 142 of the evidence base, that for higher value areas, all 'high density' and 'very high density' sites, including those tested against a higher Benchmark Land Value of £2m per hectare, will not be able to deliver full policy requirements based on the consultant's development assumptions. Furthermore, with reference to the Housing and Economic Land Availability Assessment (HELAA) 2021, high density sites of between 3 - 120 dwellings, totalling approximately 480 dwellings and could come forward within high and medium value areas across the City over the plan period as well as other typologies listed (Table 10.4, page 146). These sites will be subject to unnecessary time and cost delays associated with site specific viability testing. The modelling within the evidence base also shows that low density sites within medium value areas of between 12 - 50 dwellings will not be viable when full policy requirements are assumed. Only 11 of the 51 sites identified in the HELAA could come forward with 30% onsite affordable housing assuming CIL at £157.26, Section 106 at £5,000 per unit, 20% Part M-2 and 10% Part M-3, Future Homes Standard – Option 1 and Water Measures.

A2.83 There is no ability to site-specifically test the 20% on-site provision of affordable rented dwellings required for Build to Rent schemes across the City. Numerous site-specific viability cases have established that Build to Rent schemes face genuine viability pressures, with a number of consented Build to Rent schemes delivering reduced levels of onsite affordable housing across the south. Whilst the PPG states that "20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme" the guidance goes on to say that "guidance on viability permits developers, in exception, the opportunity to make a case seeking to differ from this benchmark" (PPG: 60-002-20180913). This exception should be captured within policy H2 wording.

A2.84 The Build to Rent development assumptions made within the evidence base, a capitalised blended average value of £2,560 per sqm, is more akin to the capitalised rental income of wholly two-bedroom flatted schemes, as opposed to the housing mix actually being delivered and sought by PCC. The Draft Portsmouth Local Housing Needs Assessment October 2019 includes approximately 15% smaller, less valuable one-bedroom units.

A2.85 In practice, Build to Rent schemes within the City are delivering approximately 22% one-bedroom units (19/01919/CS3) and emerging schemes include a percentage of smaller studio apartments in addition to one-bedroom flats. These less valuable tenures have been omitted from the modelling. Consequently, they believe the gross development value of Build to Rent schemes within the evidence base is overinflated.

Policy H2: Housing Types, Mix and Affordability - interim Council response

A number of specific points raised that may need to be considered further:

- There seems to be support for well-designed High-Rise development, should the density / design polices look at this in more detail?
- Can the City Council build more Council housing? Where is our affordable housing going to go?
- Can the evidence be derived to support an approach that would limit student housing?
- Is the 30% affordable housing target appropriate given the viability evidence?
- Is the proposed first homes approach appropriate?
- Are the assumptions underpinning the build to rent position correct?

Policy Status: **Amber**

The Council will consider the conflicting views on an appropriate affordable housing requirement and whether there is sufficient evidence to justify the proposed affordable housing position. The viability evidence that the Council has commissioned will need to be revisited to ensure that the preferred approach to affordable housing proportions is acceptable, and to take account of the latest guidance from national government.

The Council will look to update its Housing Needs Assessment to ensure the Regulation 19 position is fully supported and in line with national Government policy and takes account of the points raised in the consultation responses above. Further specific evidence will be sought where necessary to clarify the proposed positions including viability testing of the First Homes requirement introduced by the Government in April 2021.

Policy H2: Housing Types, Mix and Affordability - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:
Under the 2024 Reg 19 Local Plan, three separate policies have been prepared to cover Policy H2 of the Reg 18 Local Plan. They are: PLP17: Affordable Homes, PLP18: Housing Mix and PLP19: Housing for Specific Groups. The representations will be broken down/discussed under each of the Reg 19 policies.

Policy PLP17: Affordable Homes
At Reg 18 stage, comments were raised for and against the 30% affordable homes requirement. However, the latest HEDNA revealed that there is a notable need for affordable housing in the City, and the Council is determined to address this issue by setting an ambitious affordable housing target. As a result, the 30% affordable housing requirement has been retained.

Representations also highlighted that the 30% threshold was not tested as part of the 2020 viability assessment. In response to this, the Council commissioned an updated viability assessment to support the Pre-Submission version of the Local Plan, whereby the 30% affordable housing requirement, along with other factors such as Bird Aware payments, CIL and changes to building regulations, will be tested across a number of different development typologies.

A criterion has been included in Policy PLP17 regarding sites or developments that may have been artificially split to avoid policy requirements. Moreover, development proposals which do not meet the threshold requirements will be required to submit a detailed viability assessment at various stages of the development. These criteria reduce flexibility and ensure that every endeavour has been made to secure on-site affordable housing provision.

Representations noted that the provision of First Homes was not considered in the 2020 viability assessment. In preparation of the Pre-Submission version of the Local Plan, First Homes were tested as part of the updated viability assessment. However, it is important to note that First Homes has not been actively promoted under Policy PLP17.

Under Policy H2, the remaining 30% of the affordable tenure was broken down further into 25% for ‘First Homes’ and 5% as either ‘First Homes’ or ‘another affordable route to home ownership; Policy PLP17 now just states that the 30% should be ‘another affordable route to home ownership' such as Shared Ownership. Findings from the latest HEDNA suggest that there is a limited need/demand for First Homes and alternative schemes, such as Shared Ownership, may be more suited to Portsmouth’s context.

Additional comments regarding First Homes are no longer applicable to the corresponding policy in the Pre-Submission version of the Local Plan.

PLP18: Housing Mix
A distinction has been made between wheelchair adaptable homes and wheelchair accessible homes under Policy PLP18.

Representations highlighted the need to provide more 1 /2 bed units, which has been incorporated into Policy PLP18. The HEDNA revealed that there was a particular need for 2-bedroom accommodation, with varying proportions of 1-bedroom and 3+-bedroom homes.

PLP19: Housing for Specific Groups
Although representations raised concerns that there is already sufficient student accommodation in the City, the provision of Student Accommodation has remained in the 2024 Pre-Submission version of the Local Plan under Policy PLP19: Housing Mix. The HEDNA highlighted that there will likely be a future demand for Purpose Built Student Accommodation (PBSA) as student numbers grow in the City and student housing options in the rental market will continue to be limited. Therefore, it is important that PBSA is supported. An additional criterion has been added to PLP19 in regards to the 'future-proofing' of PBSA to address concerns that there is already a sufficient supply of PBSA in the City.

Support for communal or co-living has been included in Policy PLP19, as suggested by 'Union for Planning'.

Policy PLP19: Housing for Specific Groups supports an array of specialist housing where there is an identified need, all of which, apart from service personnel and service family accommodation, were noted in Policy H2 of the Reg 18 Local Plan. Specific quanta have not been allocated in the Pre-Submission version of the Local Plan for specialist housing. Based on population trends and forecasts, statistics and local planning history, the HEDNA identified that support should be given to these types of specialist housing where there is a demand and thus, it would not be appropriate to set particular quanta. However, it is worth highlighting that elderly person and sheltered accommodation has been highlighted as a potential use under the 417 dwellings allocated under the site allocation of St James' & Langstone Campus in the Pre-Submission version of the Local Plan (Policy PLP8).

The support for self-build or custom build homes has remained in the Pre-Submission Plan, and community led development has now been acknowledged in the supporting text for Policy PLP18. Moreover, the provision for self-build or custom build in the PLP is not enforced, nor is it stipulated where it should be located. Therefore, criteria over concerns about this type of specialist housing not being appropriate for high-density redevelopment sites are not applicable in this instance and each application for self-build or custom build will be determined on a case-by-case basis.

H3 Houses in Multiple Occupation

A2.86 A House in Multiple Occupation (HMO) is a property rented out by three or more unrelated people who are not from one 'household' (a family for example) but share communal facilities such as the bathroom or kitchen. It is sometimes called also called a 'house share'.[2]

A2.87` National planning policy states that Local Planning Authorities should plan for a sufficient supply of homes that meet the needs of different groups in the community. It highlights the need to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. Underlining this need is the requirement that planning policies and decisions create places that are safe, inclusive and accessible, and which promote health and wellbeing with a high standard of amenity for existing and future users.

A2.88 Policy H3 sets the criteria for considering applications for new HMOs including a requirement that less than 10% of residential properties within a 50m radius of the area surrounding the application property are in existing use as a HMO.

A2.89 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy H3.

7a: Do you agree with the proposed approach to the provision of the Homes in Multiple Occupation in the City?	
	No. of respondents: 106
Yes	52
No	31
Not sure/don't know	23
7b. Do you have any further comments or suggestions about the suggested approach to the provision of the Homes in Multiple Occupation in the City?	
	No. of respondents: 55

A2.90 There were varied opinions received in relation for Question 7b, some respondents felt that there were already too many HMOs in the City, and many respondents said they were an essential part of the options for housing for people available in the City. There were some questions asked on the rationale for the 50m standard and other rules on HMO proximity. It was felt by some that the Council's approach to HMOs could be beneficial, in the same way as they considered the Council's approach to student accommodation.

[2] The following are not classed as HMOs: social housing, care homes, children's homes, bail hostels, properties containing the owner and up to two lodgers and properties occupied by students that are managed by an education establishment.

A2.91 Many respondents felt that better regulation of HMOs was needed with space standards, and other amenity standards more rigidly enforced. Overall, it was felt that more control to ensure the standard of living for HMO residents was needed. The impact of HMOs was mentioned with parking being the most commonly mentioned potential issue as well as noise and anti-social behaviour for other residents.

A2.92 **Portsmouth University:** Purpose Built Student Accommodation (PBSA) that is appropriately located and well-managed plays an important role in the health and well-being of students and is a key component in the wider attraction and offer of the University. However, if such accommodation is positioned in the wrong location and is either unaffordable, of an inappropriate design or quality and/or poorly managed then that adversely affects the health and wellbeing of students. HMOs are an affordable type of housing that is affordable for many students and should be supported, any policy wording that would further restrict the creation of HMOs will likely be detrimental to the availability of this type of affordable housing for students and limit the choice and options available to students for affordable rented accommodation.

A2.93 **Portsmouth Labour Group:** propose that a policy presumption against HMOs in certain parts of the City be included in the Local Plan. It is clear that in particular areas of Portsmouth there is already an existing imbalance resulting from overconcentration of HMOs. This is something that should be included at this stage rather than a suggestion that it be looked at in future.

Policy H3: Houses in Multiple Occupation - interim Council response

Overall, the proposed approach had more support than opposition. Responses highlight areas for clarification and questioned whether where the Council go further on standards for HMOs, either through planning and or its wider role. The Council will investigate the following questions further:

- the Council's stance on purpose built HMOs;
- whether further guidance is needed through either planning or licensing to ensure the standard of living for those in HMOs.

The overall approach of the draft policy will remain largely unchanged but subject to some additional information/ clarification as per the above.

Policy Status: **Green**

The Council will revisit the HMO Policy to take on board the points received and make any points of clarification necessary. The Council will look to update its HMO SPD and licensing guidance on a regular basis to take account of the latest position / information on HMOs in the City.

Policy H3: Houses in Multiple Occupation - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- Policy PLP20 Homes in Multiple Occupation seeks to support mixed and balanced communities and ensure a range of household needs can be accommodated.
- The Policy seeks to control the concentration and quality of new HMOs, setting out that development, including increasing the occupancy of an existing HMO, will only be permitted where:
  a) 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;
  b) Development does not result in a non-HMO property being 'sandwiched' between HMO properties and does not result in three or more HMO properties in a row;
  c) Development avoids harm to the amenity of nearby residents; and
  d) The proposal accords with the Houses in Multiple Occupation: Ensuring Mixed and Balanced Communities Supplementary Planning Document or future equivalent.
- The threshold set, of 10% of residential properties within a 50-metre radius carries through from guidance set in the Council's HMO Supplementary Planning Document (SPD) in 2019, which has been used successfully in the City since the SPD's adoption. It is considered an appropriate threshold to continue using.
- Regarding comments suggesting the Council take a more positive approach, including support for purpose built HMOs combined with other facilities, the Council's evidence in the HEDNA analyses the need for purpose built accommodation for students, and for younger people and young professionals facing affordability issues in the City. While in the main, this evidence supports the positive policy approach set in Policy PLP19: Housing for Specific Groups for PBSA (see below) and communal or co-living homes, any planning application for a purpose-built HMO would be considered in line with PLP20: Houses in Multiple Occupation.
- PBSA (regarding Portsmouth University's comment) is supported in Policy PLP19: Housing for Specific Groups. The HMO Policy (PLP20) is considered to enable continued development of reasonable supply of housing for students, and others including young professionals and those on lower incomes, including in HMO accommodation.
- The policy makes explicit reference to the Council's HMO SPD (2019), which includes a range of standards to ensure adequate space, amenity and living conditions. In addition, the Council has a licensing role, referred to in Policy PLP20's supporting text, which ensures amenity and safety standards of properties to be used as HMOs. In addition, the policy's supporting text refers development proposals to standards set in the Council's Private Rental Strategy (2020).
- Planning applications for HMOs must meet the parking standards set out in the Council's Parking Standards and Transport Assessment SPD (2014).

- Criterion c) of the policy seeks to ensure that 'Development avoids harm to the amenity of nearby residents' which would include noise or other harm resulting from anti-social behaviour. Further detail is provided on a variety of forms of disturbance to local amenity, including noise, in the Council's HMO SPD.

H4 Gypsy, Travellers and Travelling Showpeople

A2.94 As well as planning for the housing needs of those in 'bricks and mortar' accommodation, the Local Plan must also consider the needs of travelling communities. In accordance with national planning policy, the Council must undertake a robust assessment of Gypsy and Traveller accommodation need in the Portsmouth area to inform the preparation of the Local Plan, including the identification of suitable sites.

A2.95 Policy H4 is a criteria based policy that will be required to assess any planning applications received and/or any new accommodation needs that arise during the plan period.

A2.96 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy H4.

8a. Do you agree with the proposed approach to Policy H4?	
	No. of respondents: 104
Yes	42
No	26
Not sure/don't know	37
8b. Do you have any further comments or suggestions about the suggested approach to the provision for Gypsies, Travellers and Travelling Showpeople Accomodation?	
	No. of respondents: 43

A2.97 A large number of comments received in response to Question 8b, relate to the lack of need within the City and suggest the Council updates the evidence on this. The **Environment Agency** has questioned point 3 of the policy suggesting that it should be Flood Zone 3 rather than the current Flood Zone 2. There were some comments relating to why we should provide sites for Gypsy and Travellers.

Policy H4: Gypsy, Travellers and Travelling Showpeople - interim Council response

As a Council we have a statutory duty to ensure that the Gypsy, Traveller and Travelling Showpeople communities have suitable sites within the City, and if there was an identified need for a site within the City this policy would seek to ensure the site would be suitable.

The Council will review the Portsmouth Gypsy and Traveller Needs Assessment to assess if the position has changed to a material degree. Recent unauthorised encampments within the City may not necessarily mean there is strategic need for site provision. Criterion 3 will be reworded to reflect the Environment Agency's comments changing Flood Zone 2 to Flood Zone 3.

Minor amendments will be made to the draft policy and the evidence base will be updated to reflect the comments received as necessary.

Policy Status: **Green**

The Council will look to update its current Gypsy and Traveller Needs Assessment to ensure it takes account of the most appropriate assumptions in regard to Gypsy and Traveller Needs provision, and ensure the Council's statutory duties are being met.

Policy H4: Gypsy, Travellers and Travelling Showpeople - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- The policy is informed by an updated assessment in the Gypsy and Traveller Accommodation Assessment (2024) which shows there is no identified need for either permanent or transit sites for Gypsies and Travellers for the plan period.
- The Policy addresses the rationale for why we should plan for Gypsies and Travellers in its introduction and supporting text and sets out a criteria based approach to manage any planning applications submitted to the Council.
- Wording has been amended and updated in light of the comment on flood zones from the EA, to ensure accordance with national technical guidance on flood risk.
- Added wording on good design, residential amenity and privacy and avoiding a variety of adverse impacts.

H5 Housing Density

A2.98 Portsmouth is known for being one of the UK's most densely populated cities, a trend that is continuing with increases in the average density of new build development since 2012.

A2.99 Residential density is the measure of the number of dwellings within a specific area or scheme, it is most commonly expressed in dwellings per hectare (dph). Building density levels in Portsmouth have always been relatively high, in part due to the historic development of the City, with the rows of artisan terraces built for the Naval Dockyard workers and their families, as well as the island geography constraints on developable land.

A2.100 National planning policy requires Local Plans to include policies that optimise the use of land and meet as much of the identified need for new housing as possible.

A2.101 Policy H5 seeks to increase the density of residential development in Portsmouth within appropriate locations to make more efficient and effective use of the land available for residential development. The policy proposes that the City area is divided into three broad density zones with an appropriate minimum density.

A2.102 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy H5.

9a. Do you agree with the proposed approach to Policy H5?	
	No. of respondents: 113
Yes	45
No	45
Not sure/don't know	21
9b. Do you have any further comments or suggestions about the suggested approach to the density of new homes in the City?	
	No. of respondents: 77

A2.103 Many of the comments received in response to Question 9b raised concerns with the high density being proposed in the draft policy on an island which is already one of the most densely populated areas outside of London. There is also significant objection to the Tipner development being located within the highest density zone. Some respondents also raised concerns of the impact on air quality and traffic in particular within the highest density zones.

A2.104 **Historic England** have also objected to the policy suggesting that part of the policy should be rewritten, firstly to acknowledge that there is a wider range of factors than urban design such as impact on the setting of Historic Assets, that could indicate that density should be moderated. Secondly, the policy should make clear that it will be for the local authority to determine when departures from the minimum densities are appropriate, rather than being framed in terms of a justification by the applicant. Historic England's view is that in most cases applicants would argue for higher densities and this should be acknowledged in how the policy is written.

Policy H5: Housing Density - interim Council response

Increasing the density of residential density in the City will help Portsmouth meet its housing need and may help to ensure that developments are viable. Focusing high density development in more accessible areas should encourage less private car use and should therefore have positive impacts in terms of air quality and emissions. The policy will be amended to address the concerns of Historic England where appropriate.

Comments received on the appropriateness of the proposed density zones will be considered as part of the update of the Housing and Employment Land Availability Assessment (HELAA) which will in turn inform this policy. Density assumptions for key sites or areas may need to be revisited and decisions regarding housing supply for the plan period may also necessitate changes to this policy.

Policy Status: **Amber**

The Council will consider the proposed policy position against the need for housing which is driven by top-down targets from central Government through the standard method, the density policy will be adjusted in response to that position and the comments received in response to Reg 18.

Policy H5: Housing Density - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

The thresholds for density levels have remained the same/been carried across from Policy H5 to Policy PLP21 in the Reg 19 Local Plan.

The residential zones however, in Figure 6.1 of the Reg 19 Local Plan differ slightly from what was proposed in Figure 4 of the Reg 18 Local Plan. The changes are as follows:

- The Centre of Cosham has changed from a high residential zone to a medium density zone. This is in response to concerns from Members that high density in Cosham was out of character.
- Port Solent has changed from a low density residential zone to a high density residential zone. This is to reflect Port Solent being suitable for a higher density of development and an 'area of opportunity' for tall buildings, as noted in criterion 7a of Policy PLP1 in the Reg 19 Local Plan.
- Southsea Town Centre, Albert Road District Centre and Elm Grove Local Centre have changed from high density residential zones to medium density zones. The reason being that medium density was deemed better suited to the surrounding character of the area(s).
- All of Kingston Road Local Centre and Fratton District Centre have become high residential zones. This is due to them being a sustainable location for high density, owing to their public transport accessibility and range of shops and

services, and also to make efficient use of the land given Portsmouth's constrained geography.

Respondents raised concerns about the high-density level proposed. In response to this, some areas have changed from high-density to medium to reflect the character of the area. However, given the physically constrained nature of Portsmouth, high density development plays an important role in helping meet the City's housing need and fosters sustainable development. As a result, the high-density residential zones have remained in the Reg 19 Local Plan.

Concern was raised over Tipner being a high residential zone. It has remained the same within the Reg 19 Local Plan to make efficient use of the land and to meet the objectives of the City Deal.

An additional criterion has been added to Policy PLP21 in the Reg 19 Local Plan, requiring the submission of robust evidence for any development proposals that have a lower residential density level than the thresholds outlined in the Policy. This is in response to the representations received from Historic England, who noted that it should be at the local authority's discretion to determine when departures from the minimum densities are appropriate.

Historic England voiced concerns over how density may impact the setting of Historic Assets. This is now covered under Policy PLP1 of the Reg 19 Local Plan, which notes development proposals should consider density and context (including existing buildings or townscapes of heritage value).

H6 Residential Space Standards

A2.105 Residential 'space standards' refer to the minimum internal space (gross internal floor area) for new dwellings that require planning permission. Space standards for new homes set out requirements for the floor space area and dimensions of the building and particular areas according to the number of occupants, including dimensions for bedrooms, storage and floor to ceiling height.

A2.106 Policy H6 aims to address overcrowding of properties and increase the number of people living in decent sized homes in the City.

10a. Do you agree with the proposed approach to Policy H6?	
	No. of respondents: 105
Yes	68
No	11
Not sure/don't know	26
10b. Do you have any further comments or suggestions about the suggested approach to space standards for new residential developments?	
	No. of respondents: 36

A2.107 Overall the majority of the comments received in response to Question 10b were supportive of the policy though a small number are sceptical how it will ensure office to residential development complies with these proposed space standards. The **Home Builders Federation** has suggested a minor amendment as they feel that the draft policy in its current form is not flexible enough to allow development which fails to meet the space standards but are well designed and needed.

Policy H6: Residential Space Standards - interim Council response

The key role of this policy is to address overcrowding of properties and increase the number of people living in decent sized homes in the City. The Council has limited control over permitted development rights such as changes of use from office to residential but can consider some amenity considerations. The Council will also continue to work with proactively with applicants to ensure standards are met where possible.

Minor amendments/ clarifications to the policy/ explanatory text will be considered in light of the comments received.

Policy Status: Green

The Council will look to take on board the responses received to Regulation 18 and make changes accordingly.

Policy H6: Residential Space Standards - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

The majority of the respondents were in favour of the policy. As a result, there have been no major changes to the corresponding Policy in the Reg 19 Local Plan. Nationally prescribed space standards are referenced in both policies, but draft Policy PLP22 in the Reg 19 Local Plan now explicitly references/includes a link to the document 'Technical Housing Standards' – nationally described space standard.

There was uncertainty raised about how Policy H6 will ensure office to residential development complies with the proposed space standards. The supporting text for Policy PLP22 in the Reg 19 Local Plan notes that *'all proposals for new homes, including change of use or conversions, must meet each appropriate space standard as a minimum.'* This provides clarification.

Economic Development and Regeneration

E1 Economic Development and Regeneration

A2.108 Economic development and growth are key to enabling access to opportunities that will support a decent quality of life for all Portsmouth residents. Regeneration is therefore, not just about improving the built environment, but also generating positive social change and health and wellbeing improvements.

A2.109 National planning policy places significant weight on supporting economic growth and productivity. The Local Plan must set out a clear economic vision and strategy to encourage sustainable economic growth. Policy E1 seeks to support the sustainable economic development and regeneration of Portsmouth with a particular focus on improving local skills and increasing skilled employment opportunities within the City.

A2.110 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy E1.

11a. Do you agree with the proposed approach to Policy E1?	
	No. of respondents: 48
Yes	34
No	11
Not sure/don't know	4
11b. Do you have any further comments or suggestions about the suggested approach to economic growth and regeneration?	
	No. of respondents: 42

A2.111 Overall, the majority of comments were supportive of the approach taken in the policy, with most of the non-supportive comments relating to the proposed employment allocation at Tipner. There was strong support for a sustainable growth and low environmental impact focus, and the need to address air quality issues from port-related activity, including the Gunwharf ferry port.

A2.112 Comments on the proposed approach included request for details on some areas e.g. on how specifically the City's economic weaknesses (finance and technology sectors or the comparative low skill / low pay economy) would be addressed or how low carbon outcomes would be achieved.

A2.113 It was requested that reference is added to the creative industries sector; the NHS as a major employer (QA and St Mary's); greater provision for young people; and potentially encouraging clustering of 'low carbon' focused businesses. Some concern was raised about commuting congestion caused by an extra 7,000 jobs and the need to ensure the new jobs created are jobs for all. There was also a request that the Council offers a suitable site to any businesses forced to relocate due to growth and regeneration proposals.

A2.114 Regenerating older facilities and unused retail space for greater employment use was suggested, as well as promoting the assets of Portsmouth to attract business.

A2.115 **Southampton City Council** supports the protection of all marine employment and maritime industrial land. They have mirrored this approach in Southampton in order to provide a consistent and unified approach across the Solent region.

Policy E1: Economic Development and Regeneration - interim Council response
There is a fine balance between encouraging economic growth across the City yet also ensuring that the environmental impact is minimised. There are numerous policies within the draft plan which ensure that all development must be sustainable and will be used in conjunction with Policy E1.
Policy Status: Green
The Council will take into consideration all the comments made in relation to Policy E1 and make any necessary changes to the policy in order to fully conform with national policy.

Policy E1: Economic Development and Regeneration - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- There is a new and separate draft Policy PLP27: Employability and Skills in the Reg 19 Local Plan focusing on employability and skills plans at the construction and occupation stages of different types of development, to improve skills levels and access for local people to new jobs in the City.
- Promoting clean economic growth is covered by policies in the Climate Emergency and Greening the City chapters of the Reg 19 Local Plan, such as draft Policy PLP33: Sustainable Construction and Onsite Renewable Energy and draft Policy PLP40: Biodiversity Net Gain.
- The introduction to the Thriving Economy chapter notes that finance, professional services, wholesale and agriculture, and typically office-based sectors, such as banking and accountancy, have lower representation in the City. Draft Policy PLP27: Employability & Skills seeks to tackle skills shortages in existing and potential business sectors, particularly advanced manufacturing and engineering businesses, life sciences, creative industries and sustainable construction methods to increase representation in these sectors.
- Draft Policy PLP25 Employment Target, which is the first policy in the Thriving Economy chapter, includes reference to the creative industries as a key sector in the City. The importance of creative industries is set out in draft Policy PLP30 Cultural and Visitor Economy.
- The introduction to the Thriving Economy chapter makes reference to the health sector being a major employer in Portsmouth due to the presence of the QA and St Mary's Hospitals.
- Policy PLP26 Safeguarding Employment Land protects employment premises on waterfront sites for marine related employment and associated uses.

E2 Employment Land Provision

A2.116 This policy of the draft Local Plan specifically focuses on the provision of offices, industrial uses and marine and maritime related employment land to ensure there is a sufficient long-term supply to support Portsmouth's growth aspirations and specialist sectors.

A2.117 The loss of employment land and business uses can undermine the ability to provide a range of local employment opportunities and suitable and affordable land within the City for businesses. However, in line with national planning policy guidance, the Local Plan must also provide a degree of flexibility to allow the economy to respond to change. Policy E2 sets out the targets for the provision of new employment land, identifies the key areas for the delivery for employment space and safeguards the

City's existing business, employment and marine and maritime related employment areas.

A2.118 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy E2.

12a. Do you agree with the proposed approach to Policy E2?	
	No. of respondents: 51
Yes	27
No	10
Not sure/don't know	14
12b. Do you have any further comments or suggestions about the suggested approach of the draft Policy E2?	
	No. of respondents: 37

A2.119 Overall the respondents to Question 12b were supportive of the approach to Policy E2. The Policy currently identifies 60,000 m^2 of mixed employment uses as part of one of the options for development at Tipner, some respondents (inc. **Natural England**) oppose large scale employment at this site primarily due to the environmental impact.

A2.120 There were comments regarding the projected need for office space and that it ought to be recognised that need for office space is likely to decrease with greater working from home in future. **Southampton City Council** are of the view that any office proposals which would lead to an over provision of office space against assessed need or an agreed target for the City for a particular phase of the plan should be subject to a sequential assessment of whether there are any sites in neighbouring authorities, including Southampton City Centre.

A2.121 It was suggested that increasing the density of employment use in existing employment areas, which were thought to be underutilised, should be encouraged including unused/ MoD land in Eastney. Other employment site suggestions include identifying Port Solent as an employment area, retaining employment space at Fratton due to the lower employment land provision in the southern part of the City and identifying employment areas in all City neighbourhoods to create true mixed use neighbourhoods. It was also suggested that employment areas/ boundaries are reviewed to consider uses around designated employment areas e.g. Vanguard site near the Port.

A2.122 The **University of Portsmouth** request acknowledgement of the role it can play in contributing added value to various industries and to knowledge-related sectors.

A2.123 **Portsmouth International Port** request greater support from the Local Plan to enable the Port's needed growth and expansion through allocation of land outside the Port for their use, suggesting the land parcels adjacent to the Rudmore Square junction currently occupied by the Lock n Store and Peninsular House office and the 'tear drop' site off the M275 situated adjacent to Port Solent.

A2.124 Other broader suggestions include focusing the advantage of being an island City, particularly through facilities to support watersports and recreation, encouraging investment in the City centre and the M27 corridor and supporting flexible terms and reasonable rents to help support new businesses. There are also some suggestions that the policy should be more proactive in encouraging greener, more sustainable employment opportunities within the City (e.g. green innovations areas/ estates) with details on how carbon emissions will be minimised and measured.

A2.125 The approach to employment land should be integrated with sustainable transport (e.g. 15 min neighbourhoods) and monitoring of how people travel to key employment locations. It was noted that some of the industrial estates are not well served by public transport e.g. Anchorage Park.

Policy E2: Employment Land Provision- interim Council response

The Council will be undertaking a full update to the Housing and Economic Land Availability Assessment (HELAA) including a Call for Sites and reassessment of the small site deliverability. The outcomes of this assessment could affect the provision of new employment proposed in Policy E2 and other options may need to be considered. The objections to employment land at Tipner as part of a significant regeneration scheme are noted.

While the Portsmouth International Port is of strategic importance to the local economy, there are constraints on the amount of land available and competing needs for redevelopment opportunities. Land in proximity to the Port will be considered for employment use where it is appropriate and deliverable. It is anticipated that the work supporting the new Port Masterplan will provide evidence of the Port's industrial land need for the plan period.

Amendments will be made to the policy in line with the comments received, outcome of the HELAA work and subject to further evidence from the Portsmouth International Port's masterplan.

Policy Status: Amber

The Council will take into consideration all the comments made in relation to Policy E2 and make any necessary changes to the policy in order to fully conform with national policy.

Policy E2 Employment Land Provision - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- The Tipner West & Horsea Island East Strategic Site is allocated in the Regulation 19 Local Plan 2024 for 58,000 m^2 of marine employment uses as part of a mixed-use scheme, as set out in draft Policy PLP3. This reduced from the 60,000m^2 proposed in the Regulation 18 Plan.
- Draft Policy PLP25: Employment Target recognises there has been a significant shift to homeworking and hybrid working post-Covid, which has been accompanied by a 'flight-to-quality' for new, high quality, modern office spaces. Premier office locations such as Lakeside North Harbour need to be retained for investment over the Plan period. The draft Regulation 19 Plan factors in reduced levels of employment growth and replacement demand for office development.
- The draft Regulation 19 Local Plan's employment evidence base highlights the possibility of intensifying and modernising the employment offer of some of the industrial estates that currently do not make efficient use of land.
- A new site allocation is included in the Regulation 19 Local Plan in Policy PLP10: Land West of Portsdown Technology Park. This allocation is for 12,500m^2 Research & Development (E(g)(ii)) and/or manufacturing (B2) uses for employment intensification in an existing employment area which is currently underutilised.
- Port Solent has not been allocated as an employment site in the Regulation 19 Local Plan. However, it has been allocated in the Local Plan under draft Policy PLP11 Port Solent for marine-related uses and the delivery of new marine and maritime employment at Port Solent would be supported by the Council.
- Part of Policy E2 sets out specific criteria for alternative uses being allowed at allocated employment sites. This has not been carried forward. Draft Policy PLP26 safeguards all employment land that is fit for purpose including allocated sites.
- Draft Policy PLP25 Employment Target references the benefits from the presence of Portsmouth International Port and acknowledges the University of Portsmouth is one of the City's major employers.
- Promoting clean economic growth is covered by policies in the Climate Emergency and Greening the City chapters of the Reg 19 Local Plan, such as draft Policy PLP33: Sustainable Construction and Onsite Renewable Energy and draft Policy PLP40: Biodiversity Net Gain.

E3 Culture and Tourism

A2.126 Portsmouth's unique heritage and coastal environment, together with sporting, arts and music events, offer a distinct cultural setting for the City. National planning policy requires that strategic policies make sufficient provision for cultural infrastructure,

which in Portsmouth is also closely linked to the enhancement of the historic environment.

A2.127 Policy E3 seeks to protect and enhance Portsmouth's existing attractions for their social and cultural value, and contribution to fostering local pride and social cohesion within Portsmouth. Enhancement will also support the Council's aims to build the City's appeal and reputation as a tourism destination and help support the diversification of the City's economy.

A2.128 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy E3.

13a. Do you agree with the proposed approach to Policy E3?	
	No. of respondents: 47
Yes	34
No	8
Not sure/don't know	5
13b. Do you have any further comments or suggestions about the suggested approach of draft Policy E3?	
	No. of respondents: 32

A2.129 Overall the comments relating to Policy E3 were positive, though some felt that the protection of cultural and tourism facilities should extend beyond the list of sites and areas currently listed within the policy. Suggestions include: Wymering Manor, Hilsea Lido, Forts Widley and Purbrook in the north of the City, the seafront, music venues and art galleries, and Langstone harbour frontage.

A2.130 Other comments included the need for more hotels, greater use of vacant buildings and meanwhile uses and additional focus on the economic benefits of the creative economy/ cluster. It was noted that such enhancements are dependent upon adequate transport infrastructure and there should be monitoring of how people get to these venues. The conflict with the need to reduce air pollution and potentially encouraging more vehicle trips to the City needs to be addressed.

A2.131 **Historic England** has also suggested additional wording to ensure that proposals in sensitive areas, such as conservation areas, consider their impact.

E3 - Culture and Tourism - interim Council response

Overall, the policy has been well received and some minor amendments may be made to strengthen the policy's overall aims in particular with regards to sensitive areas of the City such as Conservation Areas. The current list of sites seeks to protect the strategic cultural and tourism assets. Other community facilities are safeguarded in Policy C1.

The Council will take into consideration all the comments made in relation to Policy E3 and make any necessary changes to the policy in order to fully conform with national policy

Policy Status: Green

The Council will take into consideration all the comments made in relation to Policy E3 and make any necessary changes to the policy in order to fully conform with national policy.

Policy E3 Culture and Tourism - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- Draft Policy PLP30 specifically recognises the importance of the cultural and creative industries and the visitor economy for the City's economy and as a key driver of culture-led regeneration. The draft Regulation 19 Policy gives greater focus to the economic benefits of the creative economy and seeks to grow Portsmouth as a creative cluster to support the Imagine Portsmouth 2040 Vision to be a City rich in culture and creativity with a thriving economy.
- Policy E3 identified six specific areas of the City and its town centres, as areas where cultural and tourism facilities are particularly encouraged. Draft Policy PLP30 takes a broader approach, directing these uses to town centres with a continuing focus on Guildhall area of the City Centre and areas in close proximity to existing major visitor and cultural attractions.
- Draft Policy PLP30 encourages pop up and temporary uses to help bring vacant premises and sites back into use for a period prior to permanent re-occupation or redevelopment.
- Draft Policy PLP30 includes a new criterion to ensure improved access and connections between cultural and visitor attractions and the City and Town Centres.
- Draft Policy PLP30 includes wording that requires development proposals for culture, leisure, entertainment, visitor attractions and accommodation and creative industries to respond sensitively to the significance of the historic environment.

E4 Supporting Portsmouth's Town Centres

A2.132 Portsmouth's town centres provide an essential network of accessible shops, services and community facilities. This includes Portsmouth City Centre (inc. Gunwharf Quays), Southsea, Cosham, North End, Fratton and Albert Road and Elm Grove as well as a number of smaller Local Centres distributed throughout the City.

A2.133 Local authorities are required to define a network and hierarchy of centres and set policies that support their long-term viability and vitality; including tests for assessing certain types of development proposals in locations outside of defined centres. This approach is to ensure that development is as sustainably located as possible and prioritises support for main town centre uses and activity in existing town centres.

A2.134 Under current planning guidance the Local Plan must also consider the need for new 'main town centre uses' (such as retail, dining, leisure and entertainment, offices and culture and tourism development) during the plan period, or for a foreseeable period in terms of retail trends. While changes to Use Class definitions in 2020 mean that a town centre use, in any location, can now change to another without the need for planning permission, existing national planning policy requires sites in town centre locations to be prioritised for new town centre development and any changes of use that require planning permission.

A2.135 Policy E4 establishes the Portsmouth defined town centres as the preferred locations for new main town centre uses. The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy E4.

Question 14a: Should the Council seek to regulate future changes of use for town centre development where possible?	
	No. of respondents: 46
Yes	36
No	5
Not sure/don't know	6
Question 14b: Do you have any further comments or suggestions about the regulation of future changes to use of town centres?	
	No. of respondents: 31

A2.136 The responses received in relation to Question 14b include: future development needs to be sympathetic to the City's history; impact of Covid-19 and demand for new retail; poor quality environment of City Centre/Commercial Road, and suggestions on future uses such as housing, culture, leisure, food and beverages, public services, etc; opportunity to create new neighbourhoods and communities; need to support buying local and provide local amenities; need to improve active/sustainable transport links; need for a 'light but firm' approach; need for flexibility to encourage new uses; need for balanced approach; use vacant/empty

premises for alternative uses such as community events or markets; offer tax incentives for offices.

A2.137 **Public Health England:** support regulating future changes of use for town centres, particularly where this may prevent the negative impact of permitted development rights for the change of use to residential with no adherence to space and amenity standards due to their impact on health, wellbeing, and wider social impacts, which is documented elsewhere. Encourage exploring what change of use might mean for the food environment in local centres to support healthy choices/ behaviours.

A2.138 **Portsmouth Labour Group:** important to use planning policy to protect commercial/ employment use and frontages in town centre, at least at ground floor level. As demand for larger commercial/employment spaces in town centres contracts, development to alternative uses including residential at upper floors may then be appropriate, but decent living standards must be ensured.

Question 15a: Do you agree with the approach of the draft Policy E4?	
	No. of respondents: 43
Yes	25
No	12
Not sure/don't know	6
Question 15b: Do you have any further comments or suggestions about the draft Policy E4?	
	No. of respondents: 18

A2.139 The responses to Question 15b include: Gunwharf Quays is the only 'destination' centre in the City; Commercial Road should be classed as similar to Southsea Town Centre; poor quality of Commercial Road; Milton Market should be added as a centre; consideration needed to 'low traffic neighbourhood' or '15-minute City' concepts; good transport links required for centres to be accessible, diversified, and successful; benefits of out-of-centre retail - frees up centres for housing; more investment is needed; local shopping should be encouraged; growth estimates should be cautious given the impact of Covid-19; Burrfields Road (Ocean Retail Park) should be added; Lakeside only serves business/employment occupiers.

A2.140 **Historic England:** a number of the identified town centres include heritage assets or are located within Conservation Areas; they state that the policy is unsound as it makes no specific provision for edge-of-centre locations.

A2.141 **Portsmouth Climate Change Board:** need to develop plans for each centre that support buying local and reduce transportation of goods, as well as linking with active/ sustainable transport corridors.

A2.142 **Premier Marinas Ltd (via agent):** Port Solent should be identified as a District Centre given the proposed significant increase in housing within the Western Corridor and the capacity for delivery at Port Solent. This would enable growth of a supporting leisure/ tourism role and meet needs of future residents/employees. It should be a District Centre given the scale and function of Port Solent relative to other District Centres, but at the very least it should be designated as a Local Centre.

E4 - Supporting Portsmouth's Town Centres - interim Council response

Responses from the consultation showed support for the Council to seek to regulate future changes of use for town centre development. Whilst it is out of the scope for planning policy to override provisions made through legislation, the Council have the power to impose Article 4 direction(s) as a regulation tool, or utilise other planning tools such as Local (or Neighbourhood) Development Orders to enable certain development within designated areas, in order to promote long-term vitality and viability for the City's centres. With any such use, however, there would need to be sufficient justification and purpose behind it as to whether it is necessary and appropriate to introduce such tools, with consideration also given to whether any of the City's centres should have more flexibility or diversification of uses, especially given the competition for other land uses to meet the development needs of the City as a whole.

The draft policy reflects the principle that town centre uses should have a broader definition and focus on more than just retail, and makes provision for 'out-of-centre' proposals to assess through a sequential assessment or Retail Impact Assessment the impacts on existing defined centres. This is considered to be in alignment with national policy.

Policy Status: Green

The Council will take into consideration all the comments made in relation to Policy E4 and make any necessary changes to the policy in order to fully conform with national policy.

Policy E4 Supporting Portsmouth's Town Centres - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- Draft Policy PLP28 supports a diverse range of town centre uses or other uses in the Core Commercial Areas, which provide active ground floor frontages with immediate access to the street. It also seeks to retain and enhance existing markets and support new markets for a diverse independent retail and business offer. This helps support activity in the Centres and promotes access and connectivity which are key to healthier communities and greener travel patterns.
- Draft Policy PLP28 also permits a variety of uses including town centre uses and housing on land and/or premises that is within an identified centre, but outside the Core Commercial Area. Retail, commercial, leisure, cultural and service uses are encouraged at ground floor level where there is market demand.
- Draft Policy PLP28: Town Centres provides new support for new homes as part of mixed-use proposals in town centres, with guidance to encourage main town centre uses at ground floor where there is market demand.
- Draft Policy PLP28 includes a six-month marketing requirement which must show there is no market demand for the premises in its existing use or for another retail, commercial, leisure, cultural and service use. This is required for development proposals that would result in the loss of a town centre use in the Core Commercial Area of an identified centre, where one exists, or within the boundaries of an identified Local or Neighbourhood Centre.
- The designation of the town centre boundaries in draft Policy PLP28 is supported by two evidence studies, namely the Retail and Leisure Study Update (2024) and Town Centre Assessment (2024). Commercial Road has not been designated as a Town Centre and remains a City Centre location as it is the main retail destination serving the local community, the City as a whole and the wider area. Port Solent has not been designated as a District Centre as it is not considered to have the role and function of a District Centre in providing a good range of shops, services, community and cultural facilities to serve the City's communities.
- Further detail is included in the strategic site allocation draft Policy PLP6: Portsmouth City Centre on City Centre regeneration and with regard to heritage assets in the town centres draft Policy PLP53: Historic Environment.
- The new draft Policy PLP29: Small Local Shops provides specific guidance to support development of small local shops for creating and supporting sustainable local communities.

E5 Town Centre Strategies

A2.143 The draft town centre strategies in the consultation document are intended to set out the overall principles for development. Each centre strategy has been informed by an analysis of past sector trends, previous annual survey information and consultation responses and recent planning reform changes. The centre strategies include:

- The vision and broad principles for the future of each centre;
- Proposed centre and core area boundaries; and
- A broad indication of the preferred mix and location of uses.

Question 16a: Do you agree with the proposed approach to Policy E5?	
	No. of respondents: 40
Yes	24
No	7
Not sure/don't know	9
Question 16b: Do you have any further comments or suggestions about the draft Policy E5?	
	No. of respondents: 26

A2.144 The responses to Question 16b include: Gunwharf Quays and Commercial Road should be separate; agree with reducing size of these areas; not enough 'quality' in these centres; poor quality of Commercial Road - needs improving and investment; small independent businesses need to be encouraged; need inclusion of 'Milton Market'; worsening air quality at Fratton Road due to Clean Air Zone (CAZ); need consideration around management of noise/disruption where mixed-use is proposed; need for quality residential and hotel development; consideration needed for 'low traffic neighbourhoods' and '15-minute City' concepts; need improvements to/provision for walking/cycling/public transport infrastructure; improvements needed to Fratton and North End air quality; provide local centres for local people to encourage regular visits and reduce carbon emissions; Southsea food/café market over-saturated - focus on complementary independent retail and culture; any mixed use/commercial development relating to Cascades needs to respond to St Agatha's Church and also proposed housing.

A2.145 **University of Portsmouth:** support the encouragement of creative and cultural life in the City centre to add vibrancy and vitality, and to attract new students; University campus is a key part of the City centre, providing footfall, activity, and vitality, complementing the retail and service functions, and benefitting local businesses/services; recommends the university campus is identified in its own specific boundary.

A2.146 **Portsmouth Climate Change Action Board:** in favour of 'fast tracking' change of use as a low carbon way to meet housing need; consideration needed to the use of 'low traffic neighbourhoods' and '15-minute neighbourhoods' to promote active travel to/from centres, including monitoring of people's travel.

A2.147 **Portsmouth Labour Group:** generally support policy but unclear on justification for reducing the extent of protected commercial frontages along the Fratton Road/Kingston Road/London Road corridor. Active use by commercial/community

plays an important role in developing vibrant localities - do not want this put at risk; further residential development on upper floors along this corridor may create further opportunities for commercial/community uses at ground floor.

A2.148 **Public Health England:** support the drive for public realm improvements and increasing vitality/viability of local centres; can development be required to demonstrate no adverse impact on the food environment of safe night-time economies through public realm improvements?; use of greening has an integral role in public realm improvements - can local plan opportunities for innovative greening solutions to add amenity value and encourage more active/sustainable lifestyles?; question the differing policy provisions between centres - each will have its own needs but could there be a standard set of principles, with location-specific requirements above this? E.g. improving pedestrian/visitor experience, improving public realm, greening, and air quality as common principles between various centres.

E5 - Town Centre Strategies - interim Council response

Responses to the consultation show broad support with the proposed approach to the draft policy. The Council welcome the responses and suggestions received through the Regulation 18 consultation and will only make changes to this policy if new evidence necessitates any modifications.

PCC will need to take a closer look at the local context and the local impacts of the Covid-19 pandemic, changes in Use Classes and permitted development, and other factors that may have had an effect on Portsmouth's various town centres' health and vitality, and therefore, make any modifications to the proposed strategies where necessary. Through this process, existing town centre health check indicators may also be redefined, and a new methodology put in place for future monitoring of the policy(ies) and reporting in future AMRs.

Policy Status: **Amber**

The Council will take into consideration all the comments made in relation to Policy E5 and make any necessary changes to the policy in order to fully conform with national policy.

Policy E5 Town Centre Strategies - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- Policy E5 has not been carried forward in the Regulation 19 Local Plan 2024. The first part of the policy, where it relates to development contributing to the vitality of centres, diversity of uses (including creative and cultural uses) active uses, markets, access to shops and services, adverse impacts, quality and attractiveness of the environment, and design and shop front displays, are incorporated into draft Policies PLP28: Town Centres and PLP30: Small Local Shops of the Regulation 19 Local Plan.
- The definition and role of the Core Commercial Area, and guidance for development within it, is now included in draft Policy PLP28 and its introduction.
- The role and function of each level of centre within the Town Centre hierarchy is now included in the introduction of Policy PLP28.
- Detailed background assessment, including health checks, to further explain the town centre hierarchy, and the boundaries for designated centres can be found in two evidence studies - the Retail and Leisure Study Update (2024) and Town Centres Assessment (2024).

Community and Infrastructure

C1 Community and Leisure

A2.149 National planning policy recognises the essential contribution that community facilities make to the health and wellbeing of residents. Community and leisure facilities (including small shops, community halls and sports facilities) are vitally important to the health and wellbeing of local communities and planning policies should therefore, plan positively for these places.

A2.150 Policy C1 seeks to protect and retain these facilities where possible.

A2.151 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy C1.

Question 17a: Do you agree with the proposed approach to Policy C1?	
	No. of respondents: 46
Yes	22
No	13
Not sure/don't know	11
Question 17b: Do you have any further comments or suggestions about the draft Policy C1?	
	No. of respondents: 28

A2.152 Responses received in relation to Question 17b varied with regards to the protection of existing facilities and the need for a vision for the provision of new facilities. Other comments raised concerns regarding the location and poor accessibility of leisure facilities, with the limited access to swimming pools mentioned in several responses.

A2.153 The **Portsmouth Labour Group:** would like to see a focus on securing additional community facilities rather than simply protecting existing ones.

A2.154 **Sport England:** were concerned that part one of the policy could lead to the loss of sports facilities where demand for another alternative use could be considered more pressing, stating this was inconsistent with paragraph 99 of the NPPF. They also requested 'replacement facilities' to be further defined.

A2.155 **NHS Property Services:** would like to see clear evidence on what is required to satisfy each criterion of the policy and further stated *"the NPPF is clear in stating that Local Plans should adopt policies that "take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community" (Paragraph 93b). It is important that policies consider that some public service providers, such as the NHS, routinely undertake strategic reviews of their estate. These reviews are aimed at improving the provision of healthcare services by increasing efficiencies, including through the disposal of unneeded and unsuitable properties."*

Policy C1: Community and Leisure - interim Council response

The Council will take into consideration all the comments made in relation to Policy C1 and update the policy to ensure it conforms with national guidance.

Evidence of the existing facilities and need for further facilities has been provided within the Portsmouth City Council Indoor Facilities Strategy 2017. This outlines principles for future provision and recommendations including addressing the projected undersupply of swimming pool provision in the City. The Council intend to update this Strategy in due course.

The Plan as a whole will seek to enhance health, social and cultural well-being, Policy C4 (Infrastructure and Community Benefits) states in assessing the necessary provision or contribution [from development], priority consideration should be given to healthcare, along with six other development types (Transport, Flood Defences, Education, Green infrastructure, Recreational Facilities and Community Safety Facilities).

Policy Status: **Green**

The Council will take into consideration all the comments made in relation to Policy C1 and update the policy to ensure it conforms with national guidance. A glossary will provide further information where necessary. Clarifications will be made to provide further guidance on how the policy criteria could be met.

Policy C1 Community and Leisure - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- The Policy has been amended to provide more emphasis on the importance that community and leisure facilities play within Portsmouth. The Regulation 18 policy only focussed on when it is appropriate for community uses to be replaced or re-used. Although its intention was to retain community and leisure facilities, it was not aspirational for delivering anything new. This update reflects comments received by the Portsmouth Labour Group and other respondents some of whom wanted to see more aspiration in the provision of new facilities.
- In response to Sport England's concern regarding the loss of sports facilities where demand for another use is more pressing, the requirements are more stringent within the Regulation 19 Local Plan under section 2 of Policy PLP52: New & Existing Community & Leisure Facilities.
- The Regulation 19 policy provides guidance on the provision of new and/or expanded community facilities and when this will be permitted. Further detail on what is required to satisfy each criterion is provided within the supporting text and appendices of the Local Plan. The new policy also highlights the importance of community engagement, accessibility and inclusiveness, given the local health disparities within Portsmouth.
- Within the Regulation 19 Policy, redevelopment of commercially run community facilities must now be supported by marketing evidence of at least 12 months. For any application that proposes the loss of sports or leisure or community facilities, this must be supported by robust evidence showing that the use is no longer practical or viable.
- The Reg 19 Policy also signposts assets of community value and the protection offered to them.

C2 Open Spaces and Outdoor Recreation

A2.156 Open space is an important part of the City's environment. These spaces take many forms, including predominately 'green' spaces, such as parks and gardens, cemeteries, allotments and playing pitches, as well as more urban civic spaces such as Guildhall Square. The need for open space provision in Portsmouth must be considered alongside the City's other growth needs, such as housing and employment space. The proposed approach in the Local Plan is guided by the presumption in national planning policy to protect against the loss of such spaces.

A2.157 Policy C2 sets out the need for sufficient provision of open space alongside the City's other growth needs including housing and employment space and seeks to protect and enhance these locations to maximise their quality and multifunctionality.

A2.158 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy C2.

Question 18a: Do you agree with the proposed approach to Policy C2?	
	No. of respondents: 45
Yes	28
No	7
Not sure/don't know	10
Question 18b: Do you have any further comments or suggestions about the draft Policy C2?	
	No. of respondents: 30

A2.159 A common response in relation to responses received for Question 18b was the need to protect as much open space as possible, which was raised in six comments. In a further six instances, comments outlined the need for open space to deliver more than simply a green field and provide areas for enhanced biodiversity, with new open spaces, as stated by **Natural England**, needing to be 'multifunctional'. In addition to this, there were comments submitted highlighting the need for these spaces to be locally accessible, including a comment from the **Woodland Trust**, who also recommended *"adopting policy standards for residential developments that support access to the natural environment and woodland for informal recreation."*

A2.160 There was some level of ambiguity surrounding the phrase 'wider public benefit' with a handful of comments questioning whether this was quantifiable.

A2.161 **Sport England:** did not support the loss of playing fields where public benefits could be demonstrated, stating it was not consistent with Paragraph 99 of the NPPF. In addition, they wanted to *"make it clearer where existing provision is considered 'surplus to requirements', this is based on a robust assessment of need."*

A2.162 **Milton Neighbourhood Forum:** further questioned the potential for developers to build over existing open space where public benefits outweigh their loss.

A2.163 **RSPB** and **Hampshire & Isle of Wight Wildlife Trust** and **Portsmouth Climate Action Board** all raised comments regarding the role that Tipner plays in delivering open space in a densely populated City and therefore, its importance should be recognised. Other comments encouraged the protection of Fort Cumberland and Fraser Range.

A2.164 The Langstone Campus Playing Fields and Furze Lane are identified in Figure 17[3] as protected open space. One comment queried the fact that these sites are also within the Council's Brownfield Register and whether Policy C2 could contradict this

[3] Draft New Local Plan Consultation Document (2021), Page 114, accessible here: Portsmouth Local Plan 2038

A2.165 Objections were made to the land at St. James' Hospital being allocated by the **Solent NHS Trust** and **PJ Livesey** and **NHS Property Services** as open space as it would conflict with any future healthcare development that may be required.

A2.166 The third, fourth and fifth questions and the responses are outlined below.

Question 18c: Are there any areas of open space that should be added or removed from the policy?	
	No. of respondents: 36
Yes	12
No	13
Not sure/don't know	13

A2.167 There was a relatively even distribution of responses to Question 18c. Fort Cumberland, Fraser Range and Tipner were all areas highlighted that required protection.

A2.168 The **Solent NHS Trust** and **PJ Livesey** and **NHS Property Services** wanted to see the open space at St. James' Hospital removed as open space provision. Other comments raised the need for a golf course on the Island and asked for the removal of Moneyfields as this is being developed.

Question 18d: Should major new development deliver new open space?	
	No. of respondents: 43
Yes	36
No	1
Not sure/don't know	5

A2.169 There was a strong response in favour to Question 18d, with many respondents wanting more greenspace wherever possible.

Question 18e: Should major new development deliver new open space?	
	No. of respondents: 36
Yes	16
No	4
Not sure/don't know	16

A2.170 The policy proposes open space to the ratio of 1.65ha per 1,000 people is delivered on developments of 100 or more homes. Whilst there was a strong backing in favour of this ratio, the same number of responses were not sure.

Policy C2: Open Space and Outdoor Recreation- interim Council response

The overarching aim of Policy C2 is to protect and enhance existing open space within Portsmouth, delivering it where possible. Within the supporting text for the policy, it is stated that *"proposed enhancements of existing open space and recreation area should consider opportunities to increase the multifunctionality of these spaces",* for example through enhancing biodiversity value or installing new and improved recreational facilities.

The policy will be amended to comply with the NPPF and additional guidance or clarification will be provided where necessary.

The Government's National Model Design Code guidance notes (published July 2021) indicate that open space and recreation guidance on Accessibility to Natural Greenspace (ANGSt) will shortly be updated and will be focused on distance/accessibility to open space as opposed to the population-based standards which form the current evidence base for open space needs for the plan period. The evidence base may need to be reconsidered on this basis. The Council is also intending to update its own Recreation/ Sports facility Strategies which may feed into this policy.

Comments seeking to protect open space at Tipner and other nearby areas are noted. The Open Space map will be updated in-line with the progression of the St James' and Langstone Strategic Site Allocation and the Milton Neighbourhood Plan and as part of annual monitoring of planning permissions.

This policy proposes open space to the ratio of 1.65ha per 1,000 people is delivered on developments of 100 or more homes. Whilst there was a strong backing in favour of this ratio, the same number of responses also were not sure as shown by the results of Question 18c. To further understanding of this policy and ratios, the Council will look to provide visual representations.

Policy Status: **Amber**

The Council will take into consideration all the comments made in relation to Policy C2 and make any necessary changes to the policy in order to fully conform with national policy.

Policy C2: Open Space and Outdoor Recreation - Regulation 19 2024 Council response
How the representations have been taken into account in the Pre-Submission Local Plan 2024: • Point 4 of Policy PLP45 makes specific response to the need to ensure multifunctionality. • Point 2a of Policy PLP45 references the need for open space needing to be surplus to requirements based on robust assessment before it is released.

C3 Sustainable Transport

A2.171 Action is needed now to shape a future that accommodates changing travel patterns and the City's growth, in a more sustainable way. Through the Local Transport Plan 4 (2020 – 2036), we are striving to create an environment that allows everyone to travel as sustainably as possible when making everyday journeys around Portsmouth.

A2.172 The provision of a safe, convenient and efficient transport network is key in helping to build vibrant local communities, enable regeneration and achieve an environmentally sustainable future. Prioritising walking and cycling and transforming public transport will play a key role in delivering a people centred travel network across the City, linking into and connecting local areas.

A2.173 All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and committed future transport provision, and ensure that any impacts on Portsmouth's transport networks and supporting infrastructure are mitigated.

A2.174 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy C3.

Question 19a: Do you agree with the proposed approach to Policy C3?	
	No. of respondents: 47
Yes	26
No	11
Not sure/don't know	8

Question 19b: Do you have any further comments or suggestions about the Policy C3?	
	No. of respondents: 50

A2.175 The responses to Question 19b included: phase out petrol/diesel as quickly as possible to discourage use and achieve clean air; joined up strategy needed for Eastern Corridor; incentives needed to get the worst-polluting cars off the road; encourage more walking and cycling and ensure routes are safe/secure; improve infrastructure for mobility-impaired; free electric/hydrogen powered buses; more fast EV chargers across the City; making the seafront "car-free" unless EV; cycling routes need to be off-road; too much cycling provision already; all public transport, including taxis, should be EV; lack of cycle paths at east of City; "enable" rather than "encourage" the use of public transport; "Exploration" of a bus depot not enough; policy needs to include management of car movements; most dwellings do not have dedicated parking for EV charging; look at bus stop locations to see if in right places; reopen Commercial Road to buses only to save bus journey times; "chain car ferry" between Portsmouth and Hayling Island; suggested alteration improvements to various bus services and bus ticketing; more affordable public transport needed; exemptions needed for small businesses; opposition to Clean Air Zone (CAZ); increase CAZ to include Fratton Road; reduce car/freight journeys across whole island to enhance health and wellbeing; increase Park and Ride capacity significantly; introduce charges to residents and visitors driving in the City; need to understand impact of Covid-19 pandemic on travel and strike a balance on proposals for example Park and Ride; new rail stop at Paulsgrove; establish 15-minute neighbourhoods/low traffic neighbourhoods; expansion of employment result in higher commuter traffic - similar with Tipner housing; consider use of trams.

A2.176 **Milton Neighbourhood Forum (MNF):** supports the aims and objectives of the policy; though note that past Local Plans and Local Transport Plans have been ineffective in promoting active travel and public transport, and reducing reliance on private cars. According to the Department for Transport (DfT) figures, Portsmouth is the 4th most congested City in the UK. MNF support principle of granting planning permission for development where priority is given to pedestrian and cycle movements with high permeability by foot, cycle, and public transport connecting to local walking and cycling networks and services/facilities. However, state strategic transport and active travel initiatives need to be implemented before further major developments are started.

A2.177 **Southampton City Council (SCC):** broadly support the plans and are working with Portsmouth (and other authorities) to deliver the PfSH objectives including the South East Hampshire Rapid Transit. SCC reiterated the need for coherent and reliable connections between Portsmouth and Southampton that offer viable alternatives to car travel to tackle M27 congestion and suggest PCC might consider the Southampton Local Transport Plan 4 through the plan making process.

A2.178 **Hampshire County Council (HCC):** are supportive of Policy C3 and transport policies for developments to reduce the need to travel and deliver a people centred travel network that prioritises walking, cycling, and public transport. HCC want to strengthen the joint working on public transport issues and - building on the Transforming Cities Fund - both authorities need to continue to develop opportunities

to improve transport infrastructure and expand the South East Hampshire Rapid Transit.

A2.179 **Homes England (via agent):** note that the alignment with LTP4 is paramount to ensure that a co-ordinated transport strategy is delivered and suggest that the policy could recommend early engagement with the authorities, to determine the most appropriate forms of mitigation for congestion relief. In relation to the Transport Assessment prepared by Systra, no allowance [is made] for the other sustainable measures identified by the Local Plan or LTP4 (beyond the Bus Rapid Transit scheme) - none of the impacts from these have been allowed for in the forecast traffic, it is highly likely that these would come forward in the short/medium term or at least by 2036. Homes England also state that any developer contributions sought should be justified in policy in order for plan to be sound, and should meet CIL Regulation tests if sought through development.

A2.180 **Home Builders Federation (HBF):** policy cannot be set outside of the Local Plan through Supplementary Planning Documents (SPDs), therefore parking standards must be set out in the Local Plan, and any changes to these are considered through proper process of consultation and examination; if referencing SPDs, then should be clear that development will need to take account of this guidance but not that it must accord with it.

A2.181 **Bellway Homes Ltd (Wessex) (via agent):** acknowledged this slightly changed policy and have had regard to sustainable transport in their current proposals and will be providing electric charge points where appropriate and feasible to do so.

A2.182 **PCC Strategic Developments:** support Policy C3's inclusion of links between Tipner and Horsea Island, allowing buses, cyclists, and pedestrians access between Tipner and Horsea Island, the country park and Port Solent. The proposed bridge link is part of a wider package of infrastructure which will support the new community at Tipner West and Horsea Island East - although noted that this would require Option 1 to be delivered at the site (rather than Options 2 or 3).

A2.183 **National Highways (formerly Highways England):** key comments are summarised below:

- National Highways (NH) look to Portsmouth City Council to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. NH would be concerned if any material increase in traffic were to occur on the Strategic Road Network (SRN) or at its junctions because of planned growth within the City, without careful consideration of mitigation measures. It is important that the Local Plan provide the planning policy framework to ensure development cannot progress without the appropriate infrastructure being in place.
- When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. NH will support a local

authority proposal that considers sustainable measures, which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.

- NH welcome the requirement for the submission of Transport Assessments to support development proposals. Policy C3 includes the requirement for development to mitigate impacts on the local or strategic road networks, arising from the development itself and/or the cumulative effects of development, through the provision of, or contributions towards, necessary and relevant transport improvements and air pollution reduction measures.
- As the Local Plan is developed it is important that any essential infrastructure required to deliver proposed allocations within the plan is identified. It would need to be demonstrated that there was a reasonable prospect of delivery of the infrastructure that is relied upon, otherwise there is a risk the Local Plan would not be sound.
- When identifying the preferred strategy for the spatial options, consideration will need to be given to assessing the cumulative impact of new sites that might be taken forward together with already planned growth in Portsmouth on the SRN. NH welcome further dialogue on potential growth options. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably practicable. As previously stated, we will support proposals that consider sustainable measures which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort.
- Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.
- To ensure that the Local Plan is deliverable, a transport evidence base should be provided to demonstrate the Local Plan impact on the SRN and as necessary identify suitable mitigation. This work will form a key piece of evidence to demonstrate the Local Plan is sound, therefore it is important that any identified mitigation has a reasonable prospect of delivery within the timescales of when the identified growth is planned. Once the transport impacts of the Local Plan sites are understood, the Infrastructure Delivery Plan document should set out any SRN mitigation required to deliver the Local Plan development. NH would welcome the opportunity to discuss this with Portsmouth ahead of the next Local Plan consultation.

A2.184 **Portsmouth Cycle Forum (PCF)** comments include:

- Would like to see further detail on how Portsmouth City Council will ensure it [the policy] is deliverable. Whilst Portsmouth Cycle Forum broadly agrees with the proposed approach to Policy C3, PCF remain cautious about the implementation, deliverability and monitoring of it.
- PCF feel that the following points are missing and should be added to ensure that the policy is sufficiently robust, and deliverable: focus on “place” as well as a transport network; that the Clean Air Zone is retained in order to improve long term health and support changed travel habits; plans for freight consolidation centres - is land being allocated for this purpose?; is the land for new walking and cycling routes being designated through the Local Plan so that developers know they must not build over

it and must ensure that their sites are permeable?; improving public transport connections is mentioned, but reducing pollution from buses and improving access to buses and rail is not included - should the Bus Service Improvement Plan be referenced at this point?

- New policies over and above the Street Works Manual should be introduced to ensure that people walking and cycling are not disadvantaged during roadworks.
- PCF expects that:
    - Transport impacts are not just “mitigated”, but instead - and in line with LTP4 - there is a net gain for sustainable travel.
    - PCC’s Parking and Transport Assessment SPD is updated so that it is in line with the aims of the LTP4 and Local Plan, and makes it possible to work with developers to deliver improved facilities for walking and cycling. SPD should be updated to a “decide and provide” approach.
    - The policy is amended to specifically state that developers will be expected to use best practice methods to assess walking, cycling, public transport and permeability with suitably experienced transport planners who actually walk and cycle (Local Transport Note 1/20 requires this of all designers).
    - Specific reference is made to the Local Cycling and Walking Infrastructure Plan and future versions of this or similar documents.
    - Monitoring measures are strengthened.
    - It is made very clear that the mitigation options in the Transport Assessment are not taken forward before being made compliant with design guidance for walking and cycling.

A2.185 **Portsmouth Climate Action Board** comments include:

- Would like the phrase ‘affordable to use’ added to this sentence: ‘The provision of a safe, convenient, efficient and AFFORDABLE TO USE transport network is key in helping to build vibrant local communities, enable regeneration and achieve an environmentally sustainable future’.
- In place of vaguely worded aspirations, we believe that specific, time bound and measurable targets need to be introduced in relation to lowering carbon emissions from road transport and improving the percentage of local journeys using active travel. Creating a joined up network of segregated cycle lanes is a priority. Low traffic neighbourhoods and traffic circulation schemes should be given serious consideration too.
- In relation to this vision statement: 'By 2038 Portsmouth will have a people centred travel network that prioritises walking, cycling and public transport to help deliver a safer, healthier and more prosperous City' we regard the 2038 date as too distant and unambitious in terms of timescale.
- We believe allowing another generation to grow up with poor air quality, dangerous cycling infrastructure and slow / expensive public transport is unconscionable. We would like to see specific interim targets that have measurable outcomes by 2022, 2024, 2026 etc. so that high quality active and shared mobility infrastructure is delivered by 2030 at the latest.

A2.186 **Portsmouth Labour Group:** This policy is of key importance in terms of delivering sustainable development, that does not negatively impact on air quality, carbon

emissions and connectivity within the City. It could perhaps be strengthened with greater emphasis on the need for green/zero carbon forms of public transport.

A2.187 **Premier Marinas Ltd (via agent):** support the principle of improving links between Tipner and Horsea Island allowing buses, cyclists and pedestrians access between Tipner and Horsea Island, the Horsea Island country park, Port Solent and beyond; this should be delivered as part of a comprehensive package of measures designed to facilitate growth across the existing Port Solent allocation, as well as those now proposed at Horsea and Tipner; note the October 2020 Transport Assessment document, prepared by Systra, states that in relation to the A27 (Southampton Road) / Port Way junction, which is the key junction referenced within the currently adopted Local Plan allocation for Port Solent (PCS2), “the junction remains within capacity in all scenarios”. Figure 1 of the document suggests that the development scenarios tested include the 500 dwellings currently allocated at Port Solent; but only appears to accommodate approx. 1,300 dwellings across the Tipner sites; this evidence base document therefore suggests Port Solent may be delivered with no transport interventions, but the Tipner development would be likely to have greater impacts over and above the assessed scenario.

A2.188 **Friends of Old Portsmouth Association** comments include:

- Systra Transport Assessment Ref. no. 107890 dated 23 Oct 20. Several inconvenient facts are ignored:
    - It's not traffic congestion that causes air pollution, it's fossil fuel burning traffic that causes air pollution.
    - 'Optimising' road junctions to reduce queuing traffic involves giving priority to vehicles. This means relegating pedestrians to a lower priority so that they have to spend longer waiting in polluted air to cross roads. This discourages walking.
    - Making it easier to drive induces demand as more people then want to drive. Conversely, failing to allocate road space to encourage active travel suppresses demand for walking and cycling.
- It is apparent that the assumption that the City needs and can accommodate the extra road traffic is in stark contradiction to the LTP4 vision and strategic objectives.
- Most of our City is on an island that is a physical limit on the number of motor vehicles that can be squeezed into Portsmouth. Inexorable increase in the number of motor vehicles registered in Portsmouth, the number of miles driven and a plan of the island.
- Missing from the Systra report is a declaration of the motor traffic growth assumed in their modelling, and an assessment of where all the vehicles will physically go.
- Systra report seems to disregard the LTP4 vision and strategic objectives. Reading the document, it is evident that despite the title 'Transport Assessment' it is merely a motor transport assessment.
- In the week that COP26 starts, it is depressing to view how the report's authors are fixated on the outdated 'predict and provide' approach to striving to meet the insatiable demand for more road capacity for motor traffic. In 122 pages:

    - Only two mentions of existing cycle lanes (that fail to acknowledge that most cycle lanes in Portsmouth do not comply with DfT standards);
    - Only three mentions of cyclists;
    - Only two mentions of air quality (and no reference to the embarrassing fact that Portsmouth continues to have illegally high levels of polluted air);
    - No mention of climate change or climate strategy;
    - No mention of the clean air zone (CAZ) and the need to curb motor traffic (even though a CAZ was being considered well before Systra produced their report);
    - No mention of electric vehicles (EV);
    - No consideration of parking capacity and where all the extra vehicles will be accommodated;
    - No mention of rail transport;
    - No mention of local ferry services.
- The danger is that as Systra have confined their report almost exclusively to making it easier for polluting motor vehicles to drive into and around the City, this will become the baseline assumption and that sustainable transport initiatives will be relegated to lower priority.

A2.189 **Isle of Wight Council (IWC)** comments include:

- IWC fully support the commentary at paragraph 4.3.25. Sustainable travel has multiple benefits in relation to climate change, air quality and amenity and ensuring modes of travel between the island and Portsmouth are as sustainable and accessible as possible should be supported.
- IWC fully support the four strategic objectives of the Portsmouth Transport Strategy (Local Transport Plan – LTP4), particularly objective 3 ‘Transforming public transport’. Isle of Wight residents rely on public transport connections within Portsmouth for access to a wide range of key services and facilities, including those at QA hospital, and making journey times and connections as manageable as possible would be beneficial to island residents.
- IWC support the content of Policy C3 Transport and would suggest that a further bullet is added relating to the importance of maintaining and enhancing ferry connections to the Isle of Wight. Notable recent improvement schemes at The Hard Interchange (completed) and Ryde Interchange (shortly to commence) are positive steps to ensuring passenger comfort and experience using the ferry connection is enhanced, whilst maintaining these essential routes that many island residents rely on for access to key services and facilities.

A2.190 **Public Health England** are supportive of the proposed approach.

C3 - Sustainable Transport - interim Council response

The underlying broad principles of this policy are derived from the now adopted PCC Local Transport Plan 4, which was prepared through extensive consultation and informed by various recent guidance and strategies relating to transport policy. The LTP4 has also identified specific local projects and workstreams, providing an indicative prioritised delivery plan covering the period 2022/23 to 2024/25 and an indicative plan up to 2038, to implement the various aims and objectives within a Portsmouth context, which this policy also promotes. These aims/objectives are broadly as follows:

- Deliver cleaner air;
- Prioritise walking and cycling;
- Transform public transport;
- Support business and protect our assets.

The above have specific schemes/projects (some overlap across objectives) identified relating to, for example, car clubs, on-street EV charging, walking and cycling infrastructure, public transport infrastructure such as integrated ticketing, and traffic management and signalling initiatives.

In terms of parking provision and transport assessment/plan requirements, these are informed by and should align to the provisions made in NPPF Section 9.

Policy Status: **Green**

As a high-level strategic policy, this is considered to be sound on the basis that it accords with NPPF para 106, in particular criterion b) where it states that planning policies 'should be prepared with the active involvement of local highways authorities… so that strategies and investments for supporting sustainable transport and development patterns are aligned'. With the express link of this policy to the adopted LTP4, this ensures that strategies and associated projects have a joint strategic direction towards successful implementation within the identified plan period.

Policy C3: Sustainable Transport - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- Sustainable Transport Policies within the Regulation 18 plan have been split between two policies within the Regulation 19 Plan namely PLP47: Movement and Transport and PLP48: Access and Parking.
- Many of the responses received during the Regulation 18 consultation focussed on the importance of sustainability. Less reliance on the car in order to reduce emissions and improvements to active travel and public transport. The Regulation 19 policy continues to raise the importance of a modal shift from private vehicles to more sustainable forms of transport, making specific reference to the Local Cycling and Walking Infrastructure Plans (LCWIP) and ensuring applications take account of it to ensure its delivery. The Regulation 18 policy did not reference the LCWIP specifically.
- The Regulation 19 policy also continues to emphasise the importance of alignment with the Local Transport Plan 4 (LTP4). This document contains specific details on transport infrastructure that needs to come forward to reduce residents' reliance on the private car and encourage modal shift. Detailed improvements to bus and other public transport infrastructure are detailed within LTP4 to avoid duplication within the Local Plan. It also highlights the wider connections and partnership working that need to be achieved with neighbouring authorities.
- In response to Homes England and other comments including Friends of Old Portsmouth, an updated Strategic Transport Assessment has been delivered which does take into account the LCWIP. In order to facilitate these interventions, where mitigation schemes have been identified within the Strategic Transport Assessment (STA), the Council's consultants SYSTRA have reviewed the walking and cycling elements of the mitigation to assess if more suitable locations for walking and cycling improvements exist on parallel links in line with the identified LCWIP routes. If the mitigation schemes follow preferred routes, SYSTRA have advised on interventions to consider for upstream and downstream interventions. PCC's transport team have ensured that all committed projects have been considered in the Sub-Reginal Transport Model (SRTM) to that the results of the STA are as robust as possible.
- The updated STA includes those schemes which are committed and have funding to be delivered. It also highlights those which will be important to come forward to further unlock development sites.
- The supporting text to the policy encourages early engagement with Active Travel England, the Local Highways Authority and National Highways.
- PCC have worked with National Highways throughout the production of the STA to ensure that all the comments raised at the Regulation 18 consultation were addressed. Careful consideration has been made throughout the STA to ensure that any material increase in traffic on the SRN is mitigated. The Infrastructure Delivery Plan (IDP) identifies the infrastructure that is critical and required to be in place to unlock development.
- In response to the Portsmouth Cycle Forum, the Policy seeks to encourage the creation of places by ensuring developments are people centred with consideration

of safety and accessibility for all users. Policy criteria on clean air are addressed In a separate Policy PLP35: Air Quality & Pollution. The Policy seeks to protect existing walking and cycling links and whilst it does not designate land specifically it does encourage the creation of new links, taking into account the existing network. Specific details of freight consolidation are included within LTP4 and the supporting text to the policy highlights it importance.

- Portsmouth Climate Action Board's comments have been taken into consideration. The words 'affordable to use' have been added as requested. The LTP4, LCWIP and IDP provide further information on specific delivery of infrastructure projects.
- Specific reference in the Policy has been made to the LCWIP and the Policy has been drafted in liaison with PCC's Transport and active travel teams.
- The Regulation 19 policy places greater emphasis on the need to ensure highway safety on the local and strategic network. Priority should be given to pedestrians, cyclists and users of mobility aids.
- Development within the Regulation 19 policy must also meet the needs of people with disabilities.
- Some of the policy criteria which related to parking in the Regulation 18 policy are now referenced within a new Regulation 19 policy which focusses specifically on access and parking (PLP48).
- PCC have not replicated the parking standards within the policy. Instead, the Policy states that development should provide parking (if necessary) in accordance with the Parking SPD and any future equivalent. The Parking Strategy will be updated in 2025/2026 and therefore, any requirements within the Local Plan would become rapidly outdated.
- Following Regulation 18 comments from National Highways and other key stakeholders, PCC conducted a full strategic transport assessment for the Regulation 19 Local Plan. The LCWIP projects were considered within modelling along with all other secured projects being delivered on Portsmouth's highway network including public transport improvements. There is also reference within the STA of the importance of delivering projects within LTP4 to encourage a reduction in private car trips.
- Policy PLP48 (Access and Parking) is a new policy within the Regulation 19 local Plan, requiring development to deliver appropriate parking where necessary. Its aim is to discourage car use within Portsmouth, working towards reducing private vehicle emissions.
- Policy PLP48 places emphasis on the need to provide parking for bikes and other micro-mobility and the need for all new development to incorporate charging for plug-in EV and other ultra-low emission vehicles.

C4 Infrastructure and Community Benefits

A2.191 Infrastructure delivery is critical to the sustainable development of the built environment. Timely provision of key infrastructure will be necessary to provide the services that residents require and support the level of new development proposed within the plan period.

A2.192 National Planning Policy states that in setting out the Local Plan's overall strategy for the pattern, scale and quality of development, sufficient provision must also be made for infrastructure.

A2.193 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy C4.

Question 20a: Do you agree with the proposed approach to Policy C4?	
	No. of respondents: 44
Yes	23
No	6
Not sure/don't know	16

Question 20b: Do you have any further comments or suggestions about the suggested approach to Policy C4?	
	No. of respondents: 24

A2.194 The responses to Question 20b focused mainly on transport infrastructure which included support for cycling and walking improvements including 15 minute neighbourhoods, although there were other responses that felt too much was being spent on cycling. Prioritising spending on healthcare and flood defence infrastructure was also mentioned by a number of respondents. Several responses questioned the effectiveness of the Community Infrastructure Levy (CIL) to provide the required funding for infrastructure.

A2.195 **Hampshire County Council Minerals and Waste:** with specific reference to Section 4.5 of the Draft Local Plan, it is noted that a safeguarded waste site is missing from Figure 19. This site is Tipner Waste Transfer Station, operated by T. J. Waste & Recycling Limited. This site is safeguarded under Policy 26 (Safeguarding – waste infrastructure) of the HMWP, and as such is of particular importance with regard to the housing allocation BL1 – Tipner. Under allocation BL1, should the Tipner Waste Transfer Station be proposed to be removed and redeveloped, contact should be made with the operator and in line with the requirements of Policy 26 replacement equivalent capacity should be provided elsewhere as needed.

A2.196 **Missions/ Vanguard:** it is noted that the current adopted 2012 Local Plan safeguards a large area of land for highway improvements, and this has now been removed from the emerging plan. We fully support the removal of this safeguarded land designation which has previously acted as a blight to development coming forward.

A2.197 **Southern Water:** whilst the Council has not indicated that the draft Infrastructure Delivery Plan is currently open to consultation, in light of recent developments in strategic planning for water supply in Hampshire, we would like to provide some additional information which we believe is relevant to the IDP. A strategic new water resource scheme to secure water supply for Hampshire customers during dry weather is currently being proposed by Southern Water's Water for Life: Hampshire programme. The current emerging preferred option is for a water recycling and water transfer proposal to augment water supply from the recently consented Havant Thicket Reservoir. Given that this emerging scheme includes a potential pipeline corridor through the northern part of the Council's administrative area, and to highlight the strategic nature of this necessary infrastructure, we would like to see this reflected in the 'Planning Infrastructure Investments' section of the Draft Infrastructure Delivery Plan. We would be happy to provide further detailed wording to the Council in this respect as required.

A2.198 **Portsmouth International Port (south of Portico Terminal):** Other than Tipner, we would like to re-emphasise our proposed land use for the following areas within the PCC area:

- Area A: Hughes and Salvage Scrap Yard Area – Circa 0.6Ha
- Area B: North of Morrison Site and Industrial Employment Area -circa 1Ha

A2.199 Both sites are strategically placed south of the Portico terminal which are ideal for future expansion of the boundary and operational area of the Port. We would like to formally request for PCC to consider the potential utilisation of both the Rudmore Square Area and Tear Drop Site for future port development purposes in the Local Plan. The exact amount of land that can be allocated from these sites can be further discussed at the next stage of consultation.

A2.200 **NHS Property Services Limited, Registered in England & Wales:** The significant cumulative impacts of residential developments on healthcare requirements in the area should be recognised. Given their strategic importance, health facilities should be put on a level footing with affordable housing and public transport improvements when securing and allocating S106 and CIL funds, in order to enable the delivery of vital NHS projects. NHSPS is therefore pleased to see healthcare included as a priority consideration for funding within Policy C4.

A2.201 **Portsmouth Labour Group:** this policy as drafted seems to only be about trying to protect existing community facilities whereas we would like to also see a focus on future community facilities as well.

A2.202 **Bellway Homes:** the Policy should reference the fact that some of the infrastructure types listed may be covered by CIL, and that this will also be part of the overall consideration in determining the levels of contributions required.

A2.203 There were a number of infrastructure interventions proposed by members of the public such as trams. There is a greater need for doctors, school places, dentists, hospital appointments and all other such needs that should be way above some of the concerns in the Local Plan, particularly the proposed additional new homes. These should be addressed way before more housing that will negatively impact people of Portsmouth.

C4 Infrastructure and Community Benefit - interim Council response

The responses focused on infrastructure on a wider scale and did not make mention of specific projects. The focus was largely on transport improvements, health and flooding. The Council will make sure that these areas are clearly covered in the Regulation 19 policy.

The specific infrastructure projects highlighted in the comments will be taken on board through the Infrastructure development Plan and site specifics through the Housing and Economic Land Availability Assessment.

Policy Status: **Green**

The policy does not require any major changes prior to Regulation 19, the Council will look to ensure that the main areas of concern for infrastructure provision are clear in the policy.

Policy C4 Infrastructure and Community Benefit - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- Infrastructure and community benefit is now covered by three separate policies within the Regulation 19 Local Plan. These are PLP49: Public Realm, PLP50: Infrastructure Delivery and PLP51: Electronic Communication and Utilities Infrastructure.
- Policy PLP49 seeks to deliver a safe, attractive, accessible, multifunctional, and sustainable public realm within Portsmouth. There are some areas within the City that are dated and unwelcoming. Therefore, this policy aims to deliver places that people want to spend time and areas that people feel safe visiting.
- This policy raises the importance of tackling and mitigating violence against women and girls though the effective design of public realm.
- The policy also raises the importance of delivering the public realm back to pedestrians and allowing the safe movement through these areas to encourage modal shift.
- Following several comments, Portsmouth's Infrastructure Delivery Plan has been updated to reflect the Regulation 19 Local Plan. This will be consulted on as part of the Regulation 19 process. Following comments from Southern Water and the NHS, PCC have worked closely with them to understand the planned infrastructure coming forward and future infrastructure requirements as a result of the Local Plan growth. This process has been undertaken with all infrastructure providers where possible within Portsmouth.
- There has been ongoing partnership working with infrastructure providers to understand the level of infrastructure required to support the proposed Local Plan growth. Further details on specific infrastructure improvements and their criticality can be found within the IDP. This includes highways, flooding and healthcare infrastructure.
- The list in the Regulation 18 policy has been removed and further detail on the priority infrastructure can be found within PCC's Infrastructure Delivery Plan.
- Policy PLP51 of the Regulation 19 Local Plan signifies the importance of delivering electronic communication infrastructure and other utilities infrastructure across the City. It highlights the Government's goals to deliver 4G and gigabit broadband nationwide.
- Regarding minerals and waste, a comment was received from the Hampshire Minerals and Waste Planning Team which overall was supportive of the section though they identified a safeguarded site (Tipner Waste Transfer Station) omitted from Figure 19. Minerals and Waste sites do not feature in any figure of the Pre-Submission Local Plan or its Policies Map. Instead the Policies Map states that for details of the Hampshire Minerals and Waste Plan please visit https://www.hants.gov.uk/landplanningandenvironment/

Portsmouth's Environment

G1 Biodiversity

A2.204 Biodiversity is the number, variety and variability of living organisms within a given area. Areas of Portsmouth benefit from a rich and diverse biodiversity stemming from its unique environment as the UK's only 'island City'.

A2.205 National planning policy states that planning decisions should enhance the natural and local environment by minimising impacts on, and providing measurable net gains for, biodiversity. This is to include the identification, conservation, restoration and enhancement of ecological networks in order to help build resilience against current and future pressures on biodiversity.

A2.206 The Council must also comply with the requirements and assessment procedures of the relevant legislation on habitats, birds and water in order to protect the Solent's sites of national and international importance for nature conservation.

Question 21a: Do you agree with the proposed approach to Policy G1? If not what changes would you suggest and why?	
	No. of respondents: 42
Yes	23
No	13
Not sure/don't know	6
Question 21b: Do you have any further comments or suggestions about the suggested approach to Policy G1?	
	No. of respondents: 37

A2.207 The responses to Question 21b included: the need to introduce biodiversity across the City through green walls and roofs, interlinked corridors, sustainable drainage and new wetlands; mitigation packages and compensation should not be an option, and it is not enough to say new development should seek to conserve and enhance the natural environment 'wherever possible'; this policy should also challenge the impact on carbon emissions; look to further incentivise biodiversity in gardens, swift and bat bricks are essential and should be made mandatory in planning policy; this policy should be strengthened; the use of the words 'adequately compensated' weakens this policy and this policy needs to be linked to trees and their protection.

A2.208 **Milton Neighbourhood Forum (MNF):** in general welcomes the environmental policies included in the plan, however, they feel policy G1 might be better expressed to clarify an apparent inconsistency where in relation to development proposals adversely affecting designated sites. The MNF cannot agree with the principle that the "mitigation" of, or "off-setting" of, harm to wildlife habitats is acceptable or appropriate in order to allow an expansion of house-building when our environment

has already been degraded by development and depleted of function through stress and pollution.

A2.209 **The RSPB** and **HIOWWT** have recommended a number of changes to the text within draft Policy G1 which the Council will review alongside the following:

- As part of the Ecological Network, we would like to see reference to the Nature Recovery Network and sites identified as part of the upcoming Local Nature Recovery Strategy, which is due to be mandated with the enactment of the Environment Act.
- Ecological Network should explicitly state that it includes all Solent Wader and Brent Goose Strategy sites, Hampshire's Local Ecological Network (Core Sites and Opportunity Sites), Biodiversity Opportunity Areas and Priority Habitat Areas.

A2.210 **Portsmouth Climate Action Board:** would like policy G1 to also include consideration of the impact on carbon emissions, for example, some of these habitats store carbon, so need to be protected.

A2.211 **The Labour Party:** support the biodiversity policy in general but would like to see these strengthened and made more specific for example, the inclusion of requirements for green walls and green areas around new homes and businesses.

A2.212 **Natural England:** made the following comments in relation to question 21b:

- Portsmouth's Ecological Network - Please note Figure 20 depicts International and National Nature Designations, however the legend or symbology is not clear. It is recommended the map is modified to clearly show the international and national designations in and around Portsmouth, including Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar sites and Sites of Special Scientific Interest (SSSI).
- Designated sites - The Local Plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites. Natural England advise that all relevant SSSIs, European sites (SACs and SPAs) and Ramsar sites should be included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Table 5 should also be updated to reflect the hierarchy of designated sites. Designated sites should be protected and, where possible, enhanced.
- Strongly recommend that the Local Plan includes a stand-alone policy to ensure the protection of the network of Solent Wader Brent Goose Strategy sites in the City. The Local Plan Habitats Regulations Assessment will need to appropriately address the impact of development allocations on the network of SWBGS sites.
- Recreational disturbance - welcome the commitment of Portsmouth City Council in supporting the Solent Recreation Mitigation Strategy and the proposal to ensure conformity of this strategic mitigation solution with Local Plan policy. We recommend that the Local Plan includes a stand-alone policy to counteract the likely significant effects of recreational disturbance, (either

alone or in-combination) associated with residential development within a 5.6km zone of influence on the Solent SPAs (Solent & Southampton Water, Portsmouth Harbour Chichester and Langstone Harbours and Solent and Dorset Coast).

- Biodiversity Opportunity Areas and Nature Recovery Networks - Natural England welcomes the recognition of the need to focus on 'opportunities around existing designations at Portsdown Hill, Portsmouth Harbour and Langstone Harbour and other green and/or open spaces within the City, with the aim of linking, expanding and/or restoring habitat corridors as part of wider recovery networks'. Work is underway within Natural England and with partners on several of the key elements of the Environment Bill, including Nature Recovery Networks and Local Nature Recovery Strategies. It should be noted that the term Nature Recovery Network (NRN) is used to refer to a single, growing national network of improved joined-up, wildlife rich places which will benefit people and wildlife. Local Nature Recovery Strategies (LNRSs) will be the key mechanism for planning and mapping local delivery of the NRN. LNRSs will form a new system of spatial strategies for nature that will be mandated by the Environment Act. Given that national guidance on LNRSs and their relationship to strategic planning is still in development, it is recommended that Local Plan policy recognises and references its support to the delivery of the emerging NRN and LNRS covering the area.

Question 21c: How should new development seek to deliver biodiversity net gain within Portsmouth's urban environment?	
	No. of respondents: 31

A2.213 The responses to Question 21c included: the need to plant trees within new developments; encourage a range of nest boxes, green walls or roofs and community orchards; requiring the creation, restoration and recovery of habitats, not just conserving what is left; incorporating swift bricks into all new and refurbished buildings; adopting best practice guidance such as NHBC Biodiversity in New Housing Developments and only using locally appropriate species.

A2.213 **Hampshire Swifts:** recommends PCC include a 'Swift-specific' policy in the Local Plan and include the implementation of integral Swift bricks into the design of new developments would go a long way towards delivering suitable biodiversity net gains.

A2.214 **RSPB** & **HIOWWT's** responses state PCC should spatially identify which sites are strategically significant for nature through the Ecological Network and put in a presumption that any offsite biodiversity net gain should be delivered on these sites. This policy should include clear monitoring indicators to regulate biodiversity net gain within the Local Plan. Their responses also encouraged the Council to amend draft Policy G1 and set a target for development to go above and beyond the Government's 10% minimum biodiversity net gain, instead aiming for at least 20% biodiversity net gain.

A2.215 **Portsmouth Climate Action Board:** recommends using a range of solutions included green walls, roofs, bat boxes, holes for hedgehogs and tree planting.

A2.216 **Natural England:** welcomes the requirement within Policy G1 for development to achieve a net gain for biodiversity, however recommends that a minimum requirement for biodiversity net gain provision is set. Natural England also made the following comments in relation to question 21c which are summarised below:

- Recommend a separate standalone policy for Biodiversity Net Gain is proposed within the Local Plan which sets a minimum requirement for biodiversity net gain provision. The policy should also set out a requirement for the development and adoption of a Supplementary Planning Document (SPD) which can set out further detail relating to mandatory net gain, upon which the Council can build.
- Policy should set out how biodiversity net gain will be delivered, monitored and managed and the priorities for habitat creation or enhancement in different parts of the plan area. Natural England advises that on-site provision should be preferred as it helps to provide gains close to where a loss may have taken place. Off-site contributions may, however, be required due to limitations on-site or where this best meets wider biodiversity objectives set in the development plan. We therefore welcome the intention for the Council to prepare a shortlist of suitable biodiversity creation and/or enhancement projects to which off-site contributions could be made to help local development achieve biodiversity net gain.
- Biodiversity Metric 3.0 has now been published and is recommended the policy is updated to refer to this and that this metric is used to measure gains and losses to biodiversity resulting from development, and implement development plan policies on biodiversity net gain. Natural England strongly advises that developers are required to agree their calculations with PCC through a suitably designed process or protocol.
- Features such as bird and bat boxes, swift bricks, bee hotels etc. should be classed as general biodiversity enhancements that should be included as part of a wider biodiversity enhancement and mitigation plan. Net gain specifically should derive strictly from habitat enhancement and creation, required as calculated using the metric.
- The Local Plan should include requirements to monitor biodiversity net gain. These requirements should include indicators to demonstrate the amount and type of gain provided through development.
- Opportunities for environmental gains, including nature based solutions to help adapt to climate change, might include:
    - Identifying opportunities for new multi-functional green and blue infrastructure.
    - Managing existing and new public spaces to be more wildlife friendly (e.g. by sowing wildflower strips) and climate resilient.
    - Planting trees, including street trees, characteristic to the local area to make a positive contribution to the local landscape.
    - Improving access and links to existing greenspace, identifying improvements to the existing public right of way network or extending

the network to create missing footpath or cycleway links.
    - Restoring neglected environmental features (e.g. a hedgerow or stone wall or clearing away an eyesore).
    - Designing a scheme to encourage wildlife, for example by ensuring lighting does not pollute areas of open space or existing habitats.
    - Any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.
- As part of the Ecological Network, reference should be made to the Nature Recovery Network and sites identified as part of the upcoming Local Nature Recovery Strategy, which is due to be mandated with the enactment of the Environment Act. The Ecological Network should explicitly state that it includes all Solent Wader and Brent Goose Strategy sites, Hampshire's Local Ecological Network (Core Sites and Opportunity Sites), Biodiversity Opportunity Areas and Priority Habitat Areas.

Question 21d: If biodiversity net gain cannot be delivered on-site, where should projects/ locations for biodiversity creation and/ or enhancement be located within the City?	
	No. of respondents: 28

A2.217 The responses to Question 21d included: through existing developments; if not onsite, development should not be allowed to go ahead; on school, health and community sites within the City; Farlington Marshes; Horsea Country Park; every development should make a contribution no matter how small; and parts North End.

A2.218 **Homes England:** stated that there should be the provision for commuted sums to be made, subject to the CIL Regulation tests, that direct funding to biodiversity conservation, enhancement and restoration projects identified by the Council in their evidence base.

A2.219 **Portsmouth Climate Action Board:** recommend that PCV seek to replicate Bristol City Council's tree replacement standard in their Planning Obligations SPD.

A2.220 **RSPB** & **HIOWWT** responses highlighted how the Ecological Network should be a foundational spatial tool for the Local Plan to strategically decide the allocation and delivery of biodiversity net gain to ensure the maximum benefit for people and nature.

Policy G1 Biodiversity - interim Council response

The responses to the Regulation 18 consultation have further highlighted the importance of the delivering biodiversity within the City.

In preparation for its Regulation 19 consultation the City Council will ensure that the approach to this policy is in-line with the provisions of Environment Act 2021. The policy will take on board comments and suggestions made in response to Regulation 18. The Council will also continue to work with the PfSH authorities in delivering requirements of the Environment Act 2021 which includes biodiversity net gain and Local Nature Recovery Strategies.

Policy Status: **Green**

The Council welcome the responses and suggestions received and will carry out further investigations of the points raised and will refine the policy in light of new evidence.

Policy G1 Biodiversity - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- RSPB and HIOWWT: The Local Nature Recovery Strategy is referenced in Policy PLP39: Biodiversity. Brent Geese and Solent Waders are now covered by a specific policy (PLP42).
- Hampshire Swifts: Reference to swift boxes added to Policy PLP33: Sustainable Construction and Onsite Renewable Energy.
- Natural England: Policy PLP40: Biodiversity Net Gain has been added to specifically address BNG.
- The Council has developed a policy approach to BNG that reflects local circumstance and has a 20% requirement for the three allocated sites.
- Nature based solutions have been taken into account and are referenced in Policy PLP38: Green Infrastructure. The Local Nature Recovery Strategy is referenced in policy PLP39: Biodiversity.
- Portsmouth Climate Action Board: A tree replacement ratio of 1 to 1 has been included in Policy PLP41: Trees & Hedgerows.

G2 Green Infrastructure

A2.221 Green Infrastructure (GI) is a network of natural assets which includes parks, open spaces, playing fields, woodlands, allotments and private gardens as well as other features such as street trees, hedgerows, green roofs and walls. The term does not just refer to green assets but encompasses 'blue' features such as streams, ponds and other water bodies.

A2.222 National Planning Policy states that the Local Plan has a role in ensuring a strategic approach to maintaining and strengthening habitat and green infrastructure networks, and that planning for green infrastructure should be considered in the same way as provision of 'grey' infrastructure (such as roads, sewers and services) The council has ambitions to increase the levels of green infrastructure within the City which is vitally important given the pressures from population growth, climate change and other competing needs.

A2.223 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy G2.

Question 22a: Do you agree with the proposed approach to Policy G2?	
	No. of respondents: 44
Yes	31
No	6
Not sure/don't know	7
Question 22b: For instance, are there any proposed green infrastructure routes that should be added or removed from the policy?	
	No. of respondents: 36
Yes	18
No	4
Not sure/don't know	14
Question 22c: If answered yes to 21b, which green infrastructure routes do you feel should be added or removed from the policy?	
	No. of respondents: 20

A2.224 There were a total of 20 responses to this question, with varying views. The requirement for as much green infrastructure as possible was raised four times with the inclusion of green infrastructure along roads. Two further comments however, opposed the delivery of green infrastructure along roads as this would limit benefit to flying insects and birds and could become rubbish traps.

A2.225 Other locations raised within the comments included the southern end of Langstone Harbour (Milton Locks to Hayling Ferry), the new country park, areas around Hilsea, Stubbington, Bransbury to Langstone Harbour and additional areas in the south of the City. Other more localised suggestions included Baffins Road, Waverley Road, Victoria Road and Festing Road.

A2.226 The **RSPB, Hampshire & Isle of Wight Wildlife Trust** and **Portsmouth Climate Action Board** outlined the role that Tipner West played as an area of open space and therefore, should be recognised for its importance.

A2.227 Policy G2 includes the use of an Urban Greening Factor (UGF) tool within identified areas. The UGF tool allows for a simple assessment process comparing green infrastructure coverage on a proposed development site, pre and post development. Betterment in GI provision through on-site net gains is required, though there is flexibility for how this is achieved. A completed assessment will need to accompany all development proposed within these areas. The Local Plan 2038 Regulation 18 consultation also sought views on the use of the UGF tool within Policy G2.

Question 22d: Is the proposed Urban Greening Factor (UGF) Tool an appropriate way to ensure and measure net increasing in green infrastructure?	
	No. of respondents: 37
Yes	16
No	3
Not sure/don't know	17

Question 22e: Do you agree with the proposed locations for the UGF tool to be applied to new development?	
	No. of respondents: 32
Yes	8
No	6
Not sure/don't know	18
Question 22f: Do you have any further comments or suggestions about the suggested approach to the green infrastructure in Portsmouth??	
	No. of respondents: 28

A2.228 In relation to the UGF, eight comments (the largest proportion) were received which did not consider the UGF sufficient to deliver the appropriate level of green infrastructure.

A2.229 In response to the overall approach of G2, comments supported the protection of trees, although it was felt more could be done and the importance of improving the management of existing green infrastructure was highlighted.

A2.230 **Abri group:** suggested rewording of the policy as there is no certainty for proposals which have ancient woodland, aged or veteran trees 'nearby'.

A2.231 **The Woodland Trust:** supported this policy although suggested strengthening it through a proposed ratio of tree replacement, a specific policy in support of new tree planting and setting a target for tree canopy cover. The Woodland Trust recommends a 20% canopy cover target for the City with a 30% cover for development sites.

A2.232 CPRE **Hampshire:** requests Portsmouth continue to work with PfSH to include a Green Belt within their spatial planning work and include this within Policy G2.

A2.233 **The Solent NHS Trust:** raised further concern for the provision of green infrastructure at St James' Hospital.

A2.234 **RSPB** and **Hampshire & Isle of Wight Wildlife Trust** and **Portsmouth Climate Action Board** would like the policy to set high quality principles and buildings with Nature Standards, or an equivalent benchmark be set.

A2.235 **Natural England:** supported the overall approach of the policy welcoming: the recognition of green infrastructure benefits; the proposal to link up green spaces through corridors; the adoption of a UGF tool; the commitment to doubling the number of trees over the next 25 years and the requirement for development on or adjacent to proposed green infrastructure networks to protect and/or contribute to the creation, enhancement and connectivity of the network. When published, PCC will take into consideration Natural England's Green Infrastructure Standards Project.

Policy G2 Green Infrastructure - interim Council response

The key role of this policy is to resist the net loss of existing green infrastructure and deliver where possible new and improved green infrastructure networks. The Green Infrastructure Background Paper 2021 presents an analysis of all the various components forming Portsmouth's green infrastructure network and sets out the key considerations behind the formulation of the draft Policy G2. Where possible, the wording will be slightly amended to enhance protection to important 'nearby' ancient woodland, aged or veteran trees.

The potential new green corridors that have been shown within figure 21 of the Local Plan have been informed by the recommendations in the 2018 open spaces assessment to try and link up existing green spaces. An Assessment of Tree Cover in Portsmouth (2019) acknowledges the City has a lower canopy cover than other comparative cities and planned development (including Horsea Island) will seek to rectify this. The Council will review the proposed green infrastructure location outlined within the responses.

The Council has also been working on a Greening Strategy which looks to promote greening within the City via several different streams, including tree planting, in particular. The "Greening Strategy will be led by a team of officers to ensure there is a joined up comprehensive approach to land that is the responsibility of the City," improving management of green infrastructure. Where possible, targets will be introduced into the Local Plan.

The Green infrastructure Background Paper sets out all the background evidence behind the reasoning for the adoption of a UGF tool to be used as part of the Local Plan, concluding that "the requirement of some degree of improvement above minimum is the best approach for a UGF policy to take at present." The use of the UGF will be reviewed on Tipner, although no firm proposal has been sought for the future of this location as of yet.

The Green Infrastructure Background Paper, further outlines Government requirements for all plans for green infrastructure to be evidence based, although Building with Nature Standards will be considered.

Portsmouth Council will continue to work with PfSH in delivering appropriate green infrastructure solutions. Following discussions between Milton Neighbourhood Forum and NHS property services in relation to St.James' the policy will be updated accordingly.

Policy Status: **Amber**

The Council has taken on board the comments received in relation to Policy D2 and will consider the potential locations for additional green infrastructure that were put forward. The UGF tool was presented after extensive research, however, the use of the Building with Nature Standards or equivalent will be considered. Portsmouth Council will continue to monitor the status of land at St.James' and update the policy as necessary.

Policy G2 Green Infrastructure - Regulation 19 2024 Council response
How the representations have been taken into account in the Pre-Submission Local Plan 2024: • Abri Group: Specific mention of aged and veteran trees has been included in Policy PLP 41: Trees & Hedgerows. • A tree canopy cover target has been added to policy PLP 41. • Natural England: The Identified green corridors have been extended, the Urban Greening factor is now applied City wide in Policy PLP38: Biodiversity, a replacement tree ratio and tree canopy cover target have been added to policy PLP41. • RSPB and HIOWWT: Reference to Natural England's five key standards and fifteen principles have been added to Policy PLP 38: Green Infrastructure.

G3 Water Quality (Nutrient Neutrality)

A2.236 The Solent region is internationally important for its coastal habitats and species and has national level protections for many parts of the coastline and seas. High levels of nitrogen and phosphorus flowing into this environment is causing eutrophication[4] and adverse impacts on the water quality of designated habitat sites, with some areas classified as being in an 'unfavourable' condition.

A2.237 There is uncertainty regarding the impact of new housing (and other development resulting in additional overnight stays), and the associated additional wastewater outputs, on the deterioration of the water environment of designated habitat sites. Under the requirements of the Habitat Regulations[5], this uncertainty must be appropriately addressed in order for the assessment of such proposals to be legally compliant. This issue applies to all such proposals, as any increase is deemed significant (e.g. one additional dwelling), due to the in-combination impacts.

A2.238 Natural England, the Government's advisor for the natural environment, has issued guidance on achieving 'nutrient neutrality' for development proposals, which, with a calculated Nitrogen Budget and if scientifically and practically effective, is considered an acceptable means of ensuring that proposal would not add to existing nutrient burdens.

A2.239 The Local Plan 2038 Regulation 18 consultation sought views on the Council's approach to Policy G3 which aims to ensure new development involving or generating new overnight stays is nutrient neutral.

[4] Eutrophication is a process where an excessive richness of nutrients causes a dense growth of plant life and algae, depleting the oxygen available in the water body and harming aquatic species.
[5] Conservation of Habitats and Species Regulations (England and Wales) Regulations 2017 (as amended)

Question 23a: Do you agree with the proposed approach to Policy G3?	
	No. of respondents: 36
Yes	17
No	9
Not sure/don't know	10
Question 23b: Do you have any further comments or suggestions about Policy G3?	
	No. of respondents: 28

A2.240 The responses to Question 23b included: there needs to be a greater focus upon how relevant organisations (such as water companies) will partner on this; water quality is so important for wildlife and offsetting using a nitrogen budget is a last option; this policy does not go far enough; the water infrastructure must be improved first; and to ensure this policy can be found sound at examination, the measures set out in the Interim Nutrient Neutral Mitigation Strategy or other appropriate mechanisms should be incorporated into this policy to provide reasonable certainty to development.

A2.241 **The Environment Agency:** stated that whilst they understand the need for the policy, it is a very narrow policy regarding nutrient neutrality and a more general consideration of water quality should be included either within this policy or elsewhere in the plan. Specifically, the Environment Agency feel a direct reference should be made to water quality and the Water Framework Directive with its objectives to prevent deterioration of water quality and gain improvement where possible as this is important in a location such as Portsmouth where the marine environment is a key consideration for the City.

A2.242 **Homes England:** states that to ensure consistency with current Natural England guidance 'Advice on Achieving Nutrient Neutrality for New Development in the Solent Region' (March 2020), Policy G3 should be modified as follows: *"Proposals (planning applications, permissions in principle, or prior approvals) for applicable development will only be granted permission where it can be demonstrated that the development can be 'nutrient neutral' for its lifetime, or it can be proven that new growth will not deteriorate designated sites".*

A2.243 **The Isle of Wight Council:** supports the statement at paragraph 5.3.7 relating to the provision of mitigation measures to offset nitrogen output from new development. As set out in their own Position Statement on this issue, the Isle of Wight may be appropriate for 'off-site' mitigation to allow development on the mainland to take place. The Isle of Wight Council is willing to work alongside third parties such as the

Hampshire & Isle of Wight Wildlife Trust and PCC to provide a monitoring role for such mitigation sites located on the island.

A2.244 **Natural England** welcomes this policy but advises that a nitrogen budget is calculated for the Local Plan that outlines the expected level of increased nitrogen that the Local Plan development will deliver. To accompany the Local Plan nutrient budget, Natural England strongly recommend that the Local Plan includes a formalised nutrient management plan or similar strategy that clearly sets out the mitigation options to be employed, including those following the Interim approach, to demonstrate how nutrient neutrality across the entire Plan period will be achieved. Where informed by a nitrogen budget, development proposals requiring mitigation should be accompanied by an appropriate mitigation scheme, which will need to be secured as part of any permission.

A2.245 **RSPB** and **HIOWWT** welcomes this policy and are pleased to see the Council will give a strong preference to the mitigation schemes that will deliver wider environmental benefits.

Policy G3 Water Quality (Nutrient Neutrality) - interim Council response

This policy aims to ensure new development involving or generating new overnight stays are nutrient neutral. The responses to the Regulation 18 consultation have further highlighted the importance of water quality for residents and wildlife. The majority of respondents agreed with the Council's approach to this policy including the Isle of Wight Council, RSBP and HIOWWT.

The Council is currently updating its 'Interim Nutrient Neutral Mitigation Strategy' and in preparation for its Regulation 19 consultation the City Council is revisiting this policy which requires some refining. This will take on board comments and suggestions made in response to Regulation 18.

Policy Status: **Amber**

The Council welcome the responses and suggestions received and will carry out further investigations of the points raised and will refine the policy accordingly. This will also need to be clearly shown through the Regulation 19 plan and supporting documents.

Policy G3 Water Quality (Nutrient Neutrality - Regulation 19 2024 Council response
How the representations have been taken into account in the Pre-Submission Local Plan 2024: • Environment Agency: Water quality has been addressed through the SUDS policy (PLP32). This seeks to ensure that the surface run-off rates from the proposed development do not exceed the existing surface run-off rates and separating surface water from foul water flows. • Natural England: The Council has undertaken a nitrogen budget, which is now incorporated in the Habitat's Regulations Assessment.

G4 Contaminated Land

A2.246 To prevent unacceptable risks from contamination and land instability, national guidance states that planning policies and decisions should ensure that new development is appropriate for its location, as well as taking account of the impacts of the proposed use. New development must take account of ground conditions and any risks arising from contamination, including risks arising from natural hazards or former activities.

A2.247 Portsmouth's coastal location and long history of industrial and military activities have left a legacy of land contamination throughout the City. Failing to adequately address land contamination can have serious implications for human health, property and the wider environment.

A2.248 The Local Plan 2038 Regulation 18 consultation sought views on the approach the Council are taking on Policy G4 which seeks to ensure appropriate measures are undertaken to address long-term safety of the development in respect of land contamination.

Question 24a: Do you agree with the proposed approach to Policy G4?	
	No. of respondents: 35
Yes	26
No	4
Not sure/don't know	5
Question 24b: Do you have any further comments or suggestions about the suggested approach to Policy G4?	
	No. of respondents: 7

A2.249 The responses to Question 24b included: ensuring adequate assessments are undertaken and that the long-term safety of former contaminated sites are monitored by the Council.

A2.250 The **Environment Agency:** are supportive of this policy, however, for clarity they suggest that the wording is altered to make it clearer that it refers to any land that is potentially contaminated not just that which is formally designated under Part 2A of the Environmental Protection Act 1990. The wording could be amended as follows, *"planning permission will only be granted for development on or near contaminated land or where the presence of contamination is reasonably suspected….."*

G4 Contaminated Land - interim Council response

This policy aims to ensure appropriate measures are undertaken to address long-term safety of the development in respect of land contamination. The majority of respondents agreed with the Council's approach to this policy. The very low number of responses to question 24b are noted. The responses to the Regulation 18 consultation highlight the importance of the long-term safety of former contaminated sites.

The Environment Agency are supportive of this policy, however, for clarity they suggest that the wording is altered to make it clearer that it refers to any land that is potentially contaminated not just that which is formally designated under Part 2A of the Environmental Protection Act 1990. The Council feel this suggestion seems reasonable and the policy will be amended accordingly.

Policy Status: **Green**

The Council welcome the responses and suggestions received through the Regulation 18 consultation and will make minor changes to this policy.

Policy G4 Contaminated Landi - Regulation 19 Council response

How the representations have been taken into account in the Pre-Submission Local Plan:

- This issue is addressed by Policy PLP37: Contaminated Land
- Words added in response to the Environment Agency that the draft Policy also relates to sites where the presence of contamination is reasonably suspected.

G5 Flood Risk and Drainage

A2.251 Portsmouth's low lying coastal location means that the City is susceptible to flood risk, not only from tidal inundation but also surface water, rising ground water levels and possible wastewater infrastructure overflow during extreme weather events. There are also two Environment Agency (EA) designated main rivers within Portsmouth: Great Salterns Lake to the east of the island and Farlington Marshes on the mainland.

A2.252 National planning policy aims to ensure that flood risk is taken into account at all stages in the planning process, applying the sequential and exception tests where appropriate to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. Where new development is necessary in such areas by exception, it will need to be made safe without increasing flood risk elsewhere and, where possible, reducing flood risk overall.

A2.253 Policy G5 sets out the policy relating to flood protection and prevention within the City. The Local Plan 2038 Regulation 18 consultation sought views on the approach the Council are taking on Policy G5.

Question 25a: Do you agree with the proposed approach to Policy G5?	
	No. of respondents: 36
Yes	22
No	9
Not sure/don't know	5
Question 25b: Do you have any further comments or suggestions about the suggested approach to Policy G5?	
	No. of respondents: 7

A2.254 Overall the majority of the responses in relation to Question 25b were supportive of the Policy G5, though there were some which wish to see greater emphasis on encouraging natural or green flood prevention measures to support biodiversity and provide green infrastructure within the City.

A2.255 **Southern Water:** have suggested some amendments to strengthen the policy relating drainage which will ensure that the Local Plan supports the work they have undertaken to improve Portsmouth's sewerage systems resilience to withstand storm events.

Policy G5 Flood Risk and Drainage - interim Council response
The overarching aim of Policy G5 is to ensure that new development is protected from flood risk and that drainage is sufficient to prevent future problems. The amendments suggested by Southern Water seem reasonable and the policy will be amended accordingly. With regards to more natural flood prevention the Council already supports the provision of more green infrastructure within the plan and Policy G5 in its current form does not prevent such a scheme coming forward where it is deemed suitable.
Policy Status: **Amber**
The Council has taken on board the comments received in relation to Policy G5 and make the relevant appropriate changes.

Policy G5 Flood Risk and Drainage - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- Flooding and drainage are separated into two separate policies within the Regulation 19 Local Plan. Flooding is covered by Policy PLP31 and the new drainage policy is PLP32: Sustainable Drainage Systems.
- The Regulation 19 policy PLP31 makes reference to the updated Level 1 and Level 2 Strategic Flood Risk Assessments that have been undertaken for Portsmouth and the strategic and allocated sites. This uses appropriate climate change calculations.
- The Regulation 19 Policy seeks to safeguard land for flood defence structures, given their importance in reducing the risk of flooding within Portsmouth. PCC have also published a sequential and exception test to support the Local Plan detailing the process of allocating sites taking flood risk into consideration. The Policy takes more of a precautionary approach to future development location. The Policy also requires site specific Flood Risk Assessments to use the Upper End climate change allowance when assessing flood risk (responding to Portsmouth Climate Action Board's comments).
- In response to Natural England, the Woodland Trust and the RSPB and HIOWWT comments, Policy PLP31 highlights the importance of natural flood management techniques in order to attenuate surface water run-off and groundwater discharge, such as the planting of riparian woodland and the use of SuDS. This was a recommendation included within the SFRA Level 1 that PCC thought was important to include within policy. The most effective resolution is, however, holding the line in Portsmouth given the risk of flooding.
- The Regulation 19 Policy places greater emphasis on the importance of safety measures including finished floor levels, access/escape and emergency planning, as suggested by the EA.
- Recommendations included within the SFRA Level 1 and 2 (where appropriate) have been drawn out into the policy.
- Within the Regulation 18 Local Plan, drainage was covered within the flooding Policy, however, it is now a standalone policy within the Regulation 19 Local Plan.
- Following Regulation 18 comments and discussions with Southern Water and PCC as the Lead Local Flood Authority, the Policy within the Regulation 19 Local Plan provides further details on drainage including management of surface water on site and appropriate disposal of surface water.
- Following comments from PCC's Coastal and Drainage Engineer (PCC as the lead local flood authority), there is more consistency in the run-off rates required between pre and post development levels.
- This Policy has been compiled following discussions with Southern Water and taking their Regulation 18 comments into consideration. This includes the Regulation 19 Policy making reference to the drainage hierarchy which must be followed when disposing of surface water run-off.
- Policy criterion 6 of Policy PLP32 was added following the Regulation 18 comments from Southern Water. This will be agreed through the application process.
- Policy PLP32 requires SuDS to deliver multifunctional benefits in their design in response to Natural England's Regulation 18 comments.

Sustainable Design & Heritage

D1 Design

A2.256 Well-designed environments and development create better places in which to live, work, and visit, and a ‘sense of place’ for its users. The National Planning Policy Framework requires that Local Plans set out a clear design vision, reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics, as well as a positive strategy for the conservation and enjoyment of the historic environment.

A2.257 As set out in draft Policy D1, the Council will seek and promote an excellent standard and quality of design for all development in the City. The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy D1.

Question 26a: Do you agree with the proposed approach to Policy D1?	
	No. of respondents: 31
Yes	26
No	3
Not sure/don’t know	1
Question 26b: Do you have any further comments or suggestions about the suggested approach to Policy D1?	
	No. of respondents: 22

A2.258 Responses received in relation to Question 26b include: needs overriding policy for windows in conservation areas; should mandate EV charge points for all new development; consultation is important for every stage, particularly on accessibility matters; needs to be designed to reduce carbon emissions, net zero, generate clean energy, and enhance biodiversity; very broad policy that tries to cover a lot; adherence to strict environmental principles should underlie every design objective and decision; needs to reflect Policy D2; ensure incorporates 'Healthy Streets' criteria; policy does not consider if proposal is appropriate to the location, traffic, services, access, etc; City's conservation areas/assets have not been protected.

A2.259 The **Guildhall Trust:** support policy D1; the Plan understands ‘brand Portsmouth’, the nature of the built environment married to its maritime tradition. Clever and sympathetic design will continue to elevate the City, adding to its recent additions, especially in the City centre. Whilst a ‘daytime’ environment might appear pleasant and non-threatening, the evening landscape in the City centre can be imposing and less friendly. Does the Plan properly consider ‘design and heritage’ with reference to the night-time economy? Can ‘24/7’ design be properly considered, therefore clever use of lighting which softens spaces and aids mental health and well-being. We support the proposals for policies in this section ‘D1: Design’, ‘D2: Sustainable

Design and Construction', 'D5 Heritage and Archaeology' and 'D6: Heritage Enhancement'. However, a sense of 'the City by night' might be worth considering within the various statements and considerations. An attractive City by night could be as powerful to visitors and community as the one they observe by day.

A2.260 **Hampshire Police:** comments include:

- Would ask that Paragraph 6.1.8 is amended to read as follows, or with words conveying the same meaning: "Where appropriate applicants are expected to engage and work with those affected by development, the wider local community and for major development with Hampshire Constabulary, in order for them to respond to and evolve the design of schemes."
- Paragraph 6.1.11 deals with major developments and we would ask that it is amended to read as below, or with words conveying the same meaning: "Large-scale major developments should be supported by detailed masterplans or development frameworks and, where appropriate, design guides or codes. Such tools and documents are expected to be produced in collaboration and consultation with the community and Hampshire Constabulary."
- We would ask that, Policy D1, sub paragraph m, is amended to read as below, or with words conveying the same meaning: "All development must reduce the opportunities for crime and disorder by effective use of the Crime Prevention Through Environmental Design (CPTED) principles."
- Creating a safe environment for the individual and communities necessitates reducing the opportunities for crime and disorder. It is important that the opportunities for reducing crime and disorder are identified and incorporated at the very earliest stages of the design process. We would ask that some wording highlighting the requirement for development to reduce the opportunities for crime and disorder is incorporated into the Portsmouth Local Plan. Mitigating the effects of poor design can never be as effective at preventing crime and disorder as good design.

A2.261 **PCC Coastal, Highways, and Drainage Team:** recommend referencing surface water design guidance within this policy.

A2.262 **Historic England:** not sound - inconsistent with national policy (NPPF 16(d)); Clause 1 uses 'and/or' on two occasions. This implies there is a choice between employing excellent architecture or urban design. The same is true regarding site context and heritage. This is ambiguous and therefore, inconsistent with NPPF paragraph 16(d). Clause 2 also uses 'and/or', which causes the same problem. The word 'or' should be deleted in both the first and second sentences of clause 1 and the first sentence of clause 2.

A2.263 **The Woodland Trust:** support the policy in particular criterion h) integrating trees and green spaces into developments early in the design process minimises costs and maximises the environmental, social, and economic benefits that they can provide. Trees can play a significant aesthetic role helping integrate new developments into existing ones and creating a local identity. We recommend the

guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019).

A2.264 **Portsmouth Climate Change Action Board:** would like the criteria 'to achieve excellent design' to reflect Policy D2, e.g. the criteria could insist on zero/low carbon construction materials and techniques such as timber and Passivhaus design methods, or energy efficiency measures such as insulation and low carbon heating such as heat pumps or district energy schemes.

A2.265 **Portsmouth Labour Group** indicated support for the policy.

Design coding

A2.266 The updated National Planning Policy Framework (July 2021) states that local planning authorities should prepare design guides or codes consistent with the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design codes are a set of illustrated design requirements that are visual and numerical where possible to provide specific, detailed parameters for the physical development of a site or area. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances, scale of change in each place and should allow a suitable degree of variety. The code can be applied on several different scales such as City-wide, area types, development sites or on specific plots.

Question 26c: Do you think design quality in Portsmouth would benefit from having a City-wide design guide or code?	
	No. of respondents: 30
Yes	18
No	3
Not sure/don't know/comment	9

A2.267 **Abri Group:** the use of design codes should be proportionate to the expected level of development and therefore may not be appropriate on a City-wide scale. Should any design codes be appropriate for Portsmouth, these should be targeted to distinct areas in order to prevent unintended delays to development.

A2.268 The **Milton Neighbourhood Forum:** indicated support.

A2.269 **The Home Builders Federation:** A City-wide design code would provide clarity for developers as to the expectations of the Council and potentially improve the consistency of decision making. However, it will be important that the Council involves the development industry in the development of any design code to ensure it is both effective and deliverable.

A2.270 **Historic England:** a City-wide design guide or code may be beneficial to some extent, but given the size of the City, the range of types of existing and planned development and the varied issues the built environment faces, a City-wide design guide or code risks being too general to be of real use to the promotion of design quality; a more focused approach may achieve more to improve design quality in Portsmouth. Such an approach should take account of existing issues and areas where significant potential for change is likely. The City centre may be such an area; areas that are sensitive to change such as conservation areas should also be prioritised. This would require an audit of the guidance available for all existing conservation areas. Such an audit would identify which conservation areas do not have any associated guidelines; the Council should consider comprehensively updating guidelines for all conservation areas so that they reflect current national guidance, with particular regard to the strengthened guidance on design.

A2.271 **Woodland Trust:** support having a City-wide design code, including delivering the emerging requirement for tree-lined streets. Design guidance should incorporate the protection and extension of green infrastructure including support for SuDS in all new developments, and encouragement of green links, such as tree lines and hedgerows, to frame residential areas and connect existing habitats. This will make a positive contribution to requirements for net gain and nature recovery, as well as better reflecting the aspirations of the England Trees Action Plan and National Model Design Code.

Question 26d: Alternatively, what scale do you think any design guides or codes should be applied in Portsmouth?	
	No. of respondents: 12

A2.272 Responses to Question 26d include: should encourage diversity and innovative approaches; area scale but should be linked; need to consider local area and City's heritage; hard to identify a general style/material that characterises the City; emphasis should be on quality and space, with a reference to more local interpretation expressed through conservation areas; use of street design or public space codes; reference to other design codes such as those produced by English Heritage or Healthy Streets; suggest scale should be at 'village' level; suggest scale should be to particular town centres; 'guide' needs to be relevant and maintained; each area of Portsmouth will need its specifics.

Question 26e: What areas or aspects of Portsmouth's built environment and public spaces do you think could be improved through setting design requirements?	
	No. of respondents: 20

A2.273 Responses to Question 26e include: unattractive dwellings in conservation areas; mention of Buckland; ensure any new tall buildings are suited to other uses - design needs to be flexible enough to meet alternative tenures; maintain Victorian appearance of many buildings; all development in the City; mention of the seafront; would give Portsmouth its own distinctive style if designed correctly; create something people will be proud to work or live in; celebrate the maritime heritage; mention of the City centre; ensure all new development respect the existing building environment and heritage of the City; requires strong enforcement measures where standards are not met and completely change the streetscape; mention of local, district, and City centres; mention of area in front of Portsmouth and Southsea railway station; street/public space design code needed; mention of development sustainability and carbon impact; mention of Southsea and Old Portsmouth.

A2.274 **Office of the Police and Crime Commissioner for Hampshire (Cllr Luke Stubbs)**: There have been consequences from a lack of clear design framework for the public realm to date. E.g. paving at the former Chaucer House site does not match that at any other location. This fragmentation reduces the benefits obtained from repaving works. The Victoria Park scheme will connect to a quality stretch of paving from the Catherine House development. There will at some point be a redevelopment proposal on the site by the station and perhaps a repaving scheme at the station itself. The street furniture and paving should be consistent across all these sites. Southampton have had a much stronger policy on public realm for some time. Their streets and spaces framework specifies in some detail what will be acceptable, both on the public highway and which will generally be accepted within private developments. Portsmouth should have a similar policy.

Policy D1 Design - interim Council response

National policy on design has now had a shift-change in the emphasis on the role of design in the planning system. NPPF para 128 states that 'the creation of high quality, beautiful, and sustainable buildings and places is fundamental to what the planning and development process should achieve'. Moreover, community engagement and reflecting local aspirations, especially in the production of policies, design guides, and design codes is considered an essential part of the process. There is also specific reference in the NPPF on preparing design guides and codes to be consistent with the published National Design Guide and National Model Design Code.

Draft Policy D1 promotes the use of design and access statements where required. Although these still have a role in setting out the narrative for the design approach and rational for a scheme, these should not be solely relied upon to support a development proposal. Other assessment tools and processes are now expressly advocated by national policy - such as processes for design guides and design codes; assessment frameworks like Building for a Healthy Life; workshops with local communities; and assessment processes like Design Review Panels.

Policy Status: Green

It is considered that the draft policy needs minor amendments and further refinement to take into account relevant suggestions from the consultation, closer alignment with National Design Guide principles, and to place stronger emphasis on the role of community engagement, and utilisation of design assessment processes/tools such as design guides, design codes, Building for a Healthy Life, design review panels, etc. - and away from solely relying upon Design and Access Statements to support development proposals.

Policy D1 Design - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- The wording and intent of Policy D1: Design that was in the Reg 18 Local Plan, has now been largely integrated into and superseded by a new and expanded/ enhanced and bespoke replacement Policy PLP1: Design. This new Policy has been amended and adapted to ensure it provides a more thorough and complete policy response to planning Design matters in terms of securing optimised processes and outcomes.
- Issues related to windows in Conservation Areas, are addressed by the Conservation Area Appraisal and Management Plan documents which have been produced for the City's Conservation Areas. These provide guidance on the acceptability of a wide range of design parameters in relation to proposals for windows on unlisted buildings in conservation areas. The City's Conservation

Areas/assets are now better protected by a set of separate and strengthened policies on heritage namely PLP54 and PLP55 relating to Listed Buildings and Conservation Areas respectively.

- Current Government legislation does not allow (through the building regulations) for EV charging points to be mandated in new development. It is considered that making this a direct policy requirement here would therefore be unlikely to be sustained at the Local Plan examination. Elsewhere, at policies PLP2: Climate Emergency and PLP33: Sustainable Construction and Onsite Renewable Energy (para 4), the Plan does however give significant weight to the benefits of development resulting in improvements to energy efficiency and reduction in carbon emissions in new and existing buildings both domestic and non-domestic.
- Chapter 8 of the Plan (Climate Emergency) also, where the scope of existing legislation and policy allows, responds to environmental principles by addressing the need to reduce carbon emissions, work towards net zero, generate clean energy, and enhance biodiversity.
- The question of the appropriateness of a development location in terms of traffic, services and access is addressed through the procedural requirements set out in relevant legislation, and by the requirement to formally consult relevant advisory stakeholders such as the Highway Authority and Utility Companies at the planning application stage.
- Taken collectively it is considered that the Plan as a whole seeks also responds to the Healthy Steets indicators and where possible seeks to deliver their principles.
- Criterion 4 of Policy PLP1 captures the Plan's approach to crime prevention measures in development. In response to the need to make policy wording positive, it makes clear that proposals will be supported provided that they help to overcome crime and disorder, and the fear of crime, through its design, layout, and other deterrent features. Implicit within this, is a need where reasonable and appropriate for applicants to engage with and evolve scheme design through engagement with other stakeholders in the development process.
- At Reg 18 stage no dedicated policy directly addressing design codes was incorporated into the draft Plan. In order to address this novel area of practice that has been promoted by central Government, a new criterion on coding has been incorporated into policy PLP1 at the Reg 19 stage. Coding is a complex and resource intensive process. The Council has already engaged in the process through a Government led pilot scheme. The Council's final approach to coding remains under consideration but will not require a code at the City-Wide scale. This is because it is considered to be too general to be of real meaningful use to the promotion of design quality. The new Policy does however require proposals for large-scale major development and/or development of sites within sensitive locations to have positive regard to any design code or design guide that would be relevant to a site. Where a developer/applicant is required to produce a design code for a site, this will be required to be based on effective community/ stakeholder engagement, reflect local aspirations for the development of the site, and address the National Design Guide and the National Model Design Code, and have due regard to the Council's Urban Characterisation Study.

D2 Sustainable Design and Construction

A2.275 Sustainable design and construction is concerned with implementing sustainable development at the scale of individual sites and buildings. It takes account of the environmental, social and economic impacts (including health and wellbeing) of how buildings are designed and used, as well as the construction process itself.

A2.276 In addition to the Council's responsibilities to reduce emissions under the Climate Change Act 2008 (as amended) and its own Climate Emergency Declaration, the national policy requires Local Plans to contribute to the prudent use of natural resources and minimise waste and pollution, as well as mitigating and adapting to climate change.

A2.277 Policy D2 of the New Local Plan addresses the importance of sustainable design and construction practices to ensure the built environment is resilient to the impact of climate change. This policy sets out several sustainability standards that should be met by certain developments in order to achieve the highest level of sustainability.

A2.278 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy D2.

Question 27a: Do you agree with the proposed approach to Policy D2?	
	No. of respondents: 34
Yes	23
No	4
Not sure/don't know	7

Question 27b: Do you have any further comments or suggestions about the suggested approach to Policy D2?	
	No. of respondents: 20

A2.279 Of the 20 respondents in relation to Question 27b, five comments supported the inclusion of this policy given the critical importance of delivering sustainable development. **Portsmouth City Council Coastal and Drainage Team** agreed with the methods of minimising water use and the **Woodland Trust** particularly supported the use of green/blue infrastructure designed to cool sites.

A2.280 Four responses, including from the **Portsmouth Labour Group** felt however that the standards should be raised, for example new residential development meeting a 4-star rating as opposed to a 3 star rating. The Portsmouth Labour Group asked how

these measures were decided upon. Three further comments questioned the use of 'weak' and 'vague' language including 'seeks to', 'encourage' and 'consideration'.

A2.281 Additional comments focussed on the cost implications. **Historic England** were concerned about the cost implications for all conversions and change of use to meet 'Very Good' under the BREEAM Refurbishment and Fit Out standard. **Abri Group** further questioned the concern that BREEAM excellent on major new residential development had not been assessed in the 2020 viability report.

A2.282 Another comment raised by **Portsmouth Climate Action Board** was to ensure that design/retrofitting to deliver low carbon buildings does not mask an increase in greater pollution emitting activities elsewhere. This could be linked with another comment requesting a holistic approach to be taken and engagement with other sectors.

A2.283 Further comments raised the need for monitoring of carbon emissions to help builders and developers outline the reductions that there will be.

Policy D2 Sustainable Design and Construction - interim Council response

This policy has been informed by evidence including the Mitigating Climate change through the Local Plan Background Paper (2021) and the Adapting to Climate Change through the Local Plan (2021) Background Paper.

Within the accompanying text to this paragraph, it is outlined that the highest possible standards of sustainable design and construction are expected. The standards that are set out in policy are a 'minimum' that are to be achieved.

The language used within this policy replicates that of national guidance which outlines plans 'should' take a pro-active approach to mitigating climate change and new developments 'should' be planned in a way that 'can help' reduce greenhouse gas emissions. Paragraph 157 of the NPPF further states "in determining planning applications, local planning authorities should expect new development to: a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable."

The Portsmouth Development Viability Assessment (2020) states: "The additional cost of building to BREEAM Very Good standard is negligible as outlined in research" and "The additional costs of BREEAM Excellent standard ranges from just under 1% and 5.5%, depending on the nature of the scheme with offices being a little under 2%. It is assumed that new non-residential development will be to BREEAM Excellent and this increases the construction costs by 2% or so."

Throughout the production of the Local Plan, a holistic approach is taken to ensure policies across the plan will mitigate any impact that retrofitting may have on increasing overall carbon emissions in the City.

Policy Status: **Green**

Overall, this policy is considered to be suitable, with only potentially minor amendments needing to be made.

Policy D2 Sustainable Design and Construction - Regulation 19 2024 Council response
How the representations have been taken into account in the Pre-Submission Local Plan 2024: • The wording of the Policy has been strengthened in line with comments from the Portsmouth Labour Group. • The comments by Abri Group and Historic England in relation to BREAAM standards have been superseded by the December 2023 Ministerial Statement that says the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.

D3 Pollution, Health & Amenity

A2.284 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 response, the Council has prepared a Local Air Quality Plan, working closely with government's Joint Air Quality Unit (JAQU), to achieve compliance with legal limits for nitrogen oxide (NO2) in the shortest possible time.

A2.285 National planning policy is clear that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction and address identified local health and wellbeing needs.

A2.286 The Local Plan 2038 Regulation 18 consultation sought views on the approach the Council are taking on Policy D3 which seeks to ensure that consideration of all aspects of health and wellbeing are integrated into the design and construction all proposals from the outset.

Question 28a: Do you agree with the proposed approach in Policy D3?	
	No. of respondents: 29
Yes	24
No	3
Not sure/don't know	2
Question 28b: Do you have any further comments or suggestions about the suggested approach to Policy D3?	
	No. of respondents: 21

A2.287 The responses to Question 28b included: this should only be applicable to developments of two dwellings or more; the wording in this policy is too generic; design has a part to play in improving air quality but the way to address nitrogen

dioxide pollution is through traffic regulation, not design; encouraging transport links to discourage further car ownership should be included; policy D3 is the first real mention of air quality which is one of the Local Plans key themes and therefore should be front and centre; the first paragraph of the policy may need further clarification to prevent all applications being disproportionately burdened without clear direction - the PPG expects plan-making to take a strategic approach; translating this to this draft policy should take account of the identified area-specific air quality issues and sources of air pollution; and this policy should relate directly to climate change.

A2.288 **Natural England:** advises that Policy D3 incorporates a requirement for impacts on the natural environment to be considered as well as human receptors. In particular, Policy D3 should address the traffic impacts associated with new development, particularly where this impacts on Habitats sites and SSSIs. The environmental assessment of the plan (SA and HRA) should consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. Natural England consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification.

A2.289 **NHS Property Services:** stated that there is a well-established connection between planning and health in so far that the planning system has an important role in creating healthy communities. Planning can not only facilitate improvements to health services and infrastructure, thereby enabling health providers meet changing healthcare needs, but also by providing a mechanism to address the wider determinants of health. NHS Property Services therefore supports Policy D3.

A2.290 **Portsmouth Climate Action Board:** asked to see air quality in policy D3 to stipulate:

i) the projected vehicle use of residents occupying any new development.

ii) the impacts on the existing local community as well as new residents.

Policy D3 Pollution, Health and Amenity - interim Council response

This policy aims to ensure a high standard of amenity for existing uses and future users / occupiers. The majority of respondents agreed with the Council's approach to this policy with responses to the Regulation 18 consultation highlighting the importance improving air quality within the City. Responses also noted the generic wording of the policy, the need to clarify aspects of the policy and relating to transport and climate change.

In preparation for its Regulation 19 consultation the City Council will seek to refine and clarify aspects of this policy. This will take on board comments and suggestions made specifically on sites in response to Regulation 18.

Policy Status: **Green**

The Council needs to carry out further investigation of a number of the points raised and may need to make some minor changes to the policy positions to reflect the comments made and the results of that investigation.

Policy D3 Pollution, Health and Amenity - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- Policy PLP35 in the Pre-Submission Local Plan has been amended slightly to prevent all applications being disproportionately burdened in regards to their contribution to pollution levels. The wording notes 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.'*
- Policy PLP35 of the Pre-Submission Local Plan now acknowledges the potential impacts airborne pollution may have on the natural environment. This is in response to the representation received from Natural England. Furthermore, concerns raised about the relationship between pollution and designated sites are dealt with under Policy PLP39.
- Representations also highlighted that car dependency can impact levels of pollution, and that other modes of transport should be encouraged. Policy PLP47 of the Pre-Submission Local Plan acknowledges the importance of sustainable modes of transportation such as walking and public transport. Therefore, it does not need to be addressed in Policy PLP35.
- Amenity (aspects such as outlook/aspect and sense of enclosure) was addressed under Policy D3 of the Reg 18 Local Plan. This is now dealt with under Policy PLP1 of the Pre-Submission Plan. This amendment addresses concerns raised about the role Design plays in impacting air pollution.
- Positive feedback was received on the connection between Health and Pollution under Policy D3. Therefore, this has remained in Policy PLP35.

D4 Lower Carbon and Carbon Neutral Development

A2.291 Carbon neutrality, or net zero carbon emission, seeks to achieve (net) zero emissions of greenhouse gases (such as carbon dioxide, a significant contributor to climate change) by avoiding, reducing or 'offsetting' emissions to ensure there is no net increase in carbon emissions into the atmosphere.

A2.292 The UK has made commitments to mitigating global climate change under the Climate Change Act 2008 (as amended) to bring all greenhouse gas emissions to net zero by 2050. The Council therefore, has a legal obligation to help contribute to achieving these aims; a responsibility that has recognised by the declaration of a Climate Emergency in 2019 and the pledge to become a carbon neutral City by 2030. The national planning policy guidance is also clear that local authorities need to plan proactively to support the transition to a low carbon future and mitigate climate change through their Local Plans.

A2.293 Policy D4 of the New Local Plan raises awareness of the importance for delivering net zero emissions of greenhouse gases. The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy D4.

Question 29a: Do you agree with the proposed approach to Policy D4?	
	No. of respondents: 26
Yes	17
No	4
Not sure/don't know	5
Question 29b: Do you have any further comments or suggestions about the suggested approach to Policy D4?	
	No. of respondents: 16

A2.294 There were 16 responses to Question 29b, with the most focus on the wording of the policy and the provision of Carbon Offsetting. The concern for the former of these two was that it was felt the policy was not direct enough, and vague in places with the use of wording such as "demonstrate they have explored"; "Where this is possible" and "where practicable and viable". **Portsmouth Climate Action Board** felt these could risk the policy being rendered ineffectual.

A2.295 Comments were also submitted that raised concerns for the use of Carbon Offsetting, including a response from **Milton Neighbourhood Forum**. There was concern that the use of offsetting would mean developers would exploit this option as opposed to delivering sustainable development.

A2.296 Other comments raised the need for further efforts to be concentrated towards reducing carbon emissions further than those set out in building regulations and on improved transport sustainability (including comments from **CPRE Hampshire**) through reducing reliance on car journeys and more electric vehicle charging points. A comment was also raised regarding an update to the 2020 viability report to test the policy expectation to ensure the standards do not affect the delivery of affordable housing.

A2.297 **Natural England:** welcomed the approach towards Policy D4, although recommended "that Local Plan policy recognises the role of the natural environment to deliver measures to reduce the effects of climate change." In addition, they proposed four specific actions to be included within the policy as follows:

- *Set an ambitious climate-specific targets within the Policy for reducing greenhouse gas emissions that can be monitored over the Plan period, in line with the national commitment to achieving the national statutory target of net zero emissions by 2050.*
- *Identify opportunities to increase tree and woodland cover consistent with the UK target. Wherever possible, this should provide multi-functional benefits. Planting on open priority habitats must be avoided.*
- *Identify areas where nature-based solutions can provide benefits to people whilst reducing climate change vulnerability in the natural environment.*
- *Identify habitats and protected sites that are particularly vulnerable to the impacts of climate change and consider how the planning system can work to reduce these vulnerabilities.*

A2.298 Two further questions were asked in relation to policy D4 as outlined below with regards to carbon-offsetting. Half of the respondents to question 29c agreed that residual/unmitigated carbon emissions within major developments should be offset through a contribution to a Carbon Offset fund. When asked whether a fee of £95 per tonne per annum for the required period was appropriate, the majority of respondents were unsure.

Question 29c: Should the Council require major development to offset any residual/ unmitigated carbon emissions through a contribution to a Carbon Offset Fund?	
	No. of respondents: 26
Yes	12
No	4
Not sure/don't know	9
Question 29d: If a contribution is required to the Carbon Offset Fund, do you agree with the suggested rate of £95 per tonne per annum for the required period?	
	No. of respondents: 27
Yes	10
No	7
Not sure/don't know	10

Policy D4 Lower Carbon and Carbon Neutral Development - interim Council response

This policy has been informed by evidence including the Mitigating Climate Change through the Local Plan Background Paper (2021) and the Adapting to Climate Change through the Local Plan (2021) Background Paper.

The Council will take on board the comments raised with regards to the wording of the policy, however similar wording is used throughout the NPPF including 'the planning system s*hould support* the transition to a low carbon future', 'new developments *should* be planned for in ways that *can help* reduce greenhouse gas emissions' and 'LPAs should expect new development to *take account of*'.

The evidence behind the adoption of carbon-offsetting has been set out within the Mitigating Climate Change through the Local Plan Background Paper (2021) and states Carbon off-setting should only be explored once all carbon reductions through the above approaches have been undertaken. The rationale behind the cost, based on research into the levels set by other authorities, is that the price needs to be set high enough for developments not to be unviable, but not too low that this option would be more attractive than including direct measures for carbon reduction.

In response to the comments regarding improved transport sustainability, policy C3 specifically encourages the reduction in the need to travel and an uptake in the use of walking, cycling and public transport in line with the Council's Local Transport Plan 4. This policy further outlines the need for sufficient space and infrastructure to deliver charging for electric vehicles.

While this draft policy represents the Council's aspirations for low carbon development, it should be noted that the ability for Local Plans to set bespoke, higher energy standards for new development may be superseded by changes to Building Regulations, and this policy may therefore need to be reconsidered in due course.

Other areas of the Local Plan discuss how carbon can be reduced via other methods not relating solely to development. E.g. increasing Green Infrastructure (Policy G2) has a role reducing carbon emissions through the cooling of urban areas, providing more attractive routes for walking and cycling, filtering and buffering pollutants.

This policy will be subject to viability assessment as the Plan progresses and will indicate whether requiring such standards would impact on affordable housing provision.

Policy Status: **Amber**

Further assessment of the potential for carbon offsetting requirements will be undertaken to support the policy (including updated viability assessment), and the policy wording will be updated or clarified in response to the comments as necessary.

Policy D4 Lower Carbon and Carbon Neutral Development - Regulation 19 2024 Council response
How the representations have been taken into account in the Pre-Submission Local Plan 2024: • The majority of representations raised concerns about the wording/provision of Carbon Offsetting under Policy D4. Following the Government's publication of the Written Ministerial Statement 2023, carbon offsetting is no longer being taken forward and therefore, it has been removed from corresponding Policy PLP33. As a result, it has also not been included in the updated Viability Assessment for the Pre-Submission Local Plan. Therefore, these representations are no longer applicable. - Representations provided by Natural England suggested a number of actions to be added to Policy D3, including climate-specific targets to reduce greenhouse gas emissions, increasing tree and woodland cover, nature-based solutions, as well as identifying habitats and protected sites vulnerable to the impacts of climate change. These are addressed under a number of other policies in the Pre-Submission Local Plan, including: Policy PLP2: Climate Emergency (a core policy), Policy PLP41: Trees & Hedgerows and Policy PLP39: Biodiversity.

D5 Heritage and Archaeology

A2.299 The City's numerous heritage assets[6] are valued for their architectural, aesthetic, historic, communal and evidential contribution to the City. Heritage assets can also offer an opportunity for 'culture-led regeneration' and the achievement of wider environmental, social, and economic objectives.

A2.300 Policy D5 applies to any proposals affecting the fabric and/or setting of designated heritage assets including Scheduled Ancient Monuments, listed buildings (at Grade I, II* and II), Registered Parks and Gardens, Conservation Areas, and archaeological find sites, where relevant. It will also apply to non-designated heritage assets including those identified through the Council's Local List and any other buildings, structures or sites which may come to the council's attention that are considered to enjoy objective and justifiable heritage merit.

A2.301 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy D5.

[6] Heritage Assets include designations such as Conservation Areas, listed buildings, Scheduled Ancient Monuments, and Historic Parks and Gardens

Question 30a: Do you agree with the proposed approach to Policy D5?	
	No. of respondents: 25
Yes	15
No	4
Not sure/don't know	6
Question 30b: Do you have any further comments or suggestions about the suggested approach to Policy D5?	
	No. of respondents: 18

A2.302 Overall the comments submitted in relation to Question 30b were supportive of the Policy D5. **Historic England** however feels that the draft policy in its current form is inconsistent with national policy (NPPF paragraphs 199-205). This is because they feel the draft policy does not reflect the staged approach that is set out in NPPF Chapter 16 and some components of the NPPF approach are completely absent from Policy D5.

A2.303 Furthermore, D5 makes no provision for proposals that would result in less than substantial harm to designated heritage assets, or effects on non-designated heritage assets. The concepts set out in NPPF paragraphs 204 & 205 should also be incorporated into the policy for completeness. Policy D5 should be amended to reflect NPPF.

D5 Heritage and Archaeology - interim Council response
The overarching aim of Policy D5 is to protect the heritage assets and their setting within the City. Comments raised by Historic England have been noted and the Council will engage with Historic England as necessary to ensure that the policy is in compliance with the NPPF.
Policy Status: **Green**
Minor amendments will be made to the policy wording as necessary.

Policy D5 Heritage and Archaeology - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- The wording and policy intent of Policy D5: Heritage and Archaeology that was in the Reg 18 Local Plan, has now been integrated into and superseded by a new and significantly expanded/ enhanced and bespoke replacement policy relating exclusively to Archaeology (PLP 56) in the Reg 19 Local Plan. This new policy has been amended and adapted to ensure it responds both to relevant policy in the NPPF, and the needs of the Authority's archaeological stakeholders. It provides a more thorough and complete policy response to planning archaeology in terms of securing optimised processes and outcomes.
- Provision has now been made at the Reg 19 stage in criterion 2 of Policy PLP 53: Historic Environment for proposals that would result in less than substantial harm to designated heritage assets. Their impact should be weighed against the public benefits of the proposal including, where appropriate, securing optimum viable use of the asset.
- Effects on non-designated heritage assets are also now addressed at criterion 6 of PLP 53.
- The LPA has also engaged positively with Historic England at the Reg 19 stage, soliciting commentary on the new range of heritage specific policies, making a number of changes to the draft wording of heritage policies as a result, and seeking a Statement of Common Ground to ensure consistency with national policies.

D6 Heritage Enhancement

A2.304 Portsmouth has a significant track record, going back many years, of pursuing and implementing opportunities for the creative re-use of heritage assets. Policy D6 responds to the opportunities that the City's heritage assets, including some of its largest and most prominent sites, offer to help deliver wider social, economic, and environmental benefits. The policy also aims to facilitate efforts to go beyond simple repair and maintenance measures for the City's 'at risk' heritage assets, including those not included on HE's register.

A2.305 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy D6.

Question 31a: Do you agree with the proposed approach to Policy D6?	
	No. of respondents: 27
Yes	23
No	0
Not sure/don't know	4
Question 31b: Do you have any further comments or suggestions about the suggested approach to Policy D6?	
	No. of respondents: 9

A2.306 Overall the comments on the approach to Policy D8 were largely positive.

A2.307 Comments included requests for reference to the City's museums, more emphasis on historic streetscapes, outlooks and setting, greater management of the existing Conservation Areas, potential for grants to owners of heritage assets and reference to consequences for damage or demolishment of heritage assets.

A2.308 There were a couple of comments encouraging the Council to have regard to the historic environment and ensure those assets are protected sufficiently.

D6 Heritage Enhancement - interim Council response
The overarching aim of Policy D6 is to facilitate efforts to go beyond simple repair and maintenance measures for the City's 'at risk' heritage assets, including those not included on HE's register. The Council welcomes the support and suggestions for this draft policy.
Policy Status: **Green**
Overall, this policy is considered to be suitable, with only potentially minor amendments to reflect any changes.

Policy D6 Heritage Enhancement - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- Policy D6: Heritage Enhancement that was in the Reg 18 Plan is acknowledged as quite brief. Its wording has been adapted/ expanded and fully integrated into a new, broader and significantly enhanced replacement Policy PLP 53: Historic Environment, which supersedes it. Criteria 4 and 5 of this policy in particular address the enhancement of assets.
- The City Museum service is now referenced with a requirement at criterion 3 of Policy PLP53 for an applicant to consult the City Council's Historic Environment Record (HER), which is held/ managed by the Museum Service. Beyond this it is not considered necessary or appropriate – given the necessary constraints of brevity to discuss the Museum Service.
- Policy PLP 53 also now sits alongside a range of other new, expanded and enhanced policies related specifically and exclusively to heritage matters namely PLP 54: Listed Buildings, PLP 55: Conservation Areas and PLP 56: Archaeology in the Reg 19 Local Plan. Both individually and collectively these policies address a wider range of heritage objectives and outcomes and in greater depth than the previous Reg 18 policies. It is the intention of this new suite of policies that they are more reflective of, and consistent with national policy (NPPF Chapter 16), and promote and ensure the conservation of the City's heritage assets as effectively and robustly as possible.
- Courtesy of current legislation set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, the impact of proposals on the setting (and therefore also the outlook), of listed buildings is already a determining issue of scheme acceptability at the application stage. The same act also seeks to secure the preservation of the character and appearance of Conservation Areas. Compliance with legislation has primacy in all planning decision making, consequently the addition of further policy requirements in this area can provide for greater detail and clarity around interpretation and approach, which are considered beneficial but cannot, and do not need to, supersede or 'replace' the requirements of legislation.
- Notwithstanding this, and in contrast to the earlier more limited policy in the Reg 18 Local Plan, the new Policy PLP 55: Conservation Areas at criterion 2 (a-d) does place a greater emphasis on the conservation of historic streetscape, seeking the retention of historic architectural features, townscape and roofscape, green infrastructure and the use of distinctive local materials. It is the intent of these policies that they secure greater and improved (more sympathetic) consideration and subsequent management of changes to the fabric and setting of the City's Conservation Areas.
- The question of grants for historic homeowners is a matter that falls outside of the necessary scope of the Local Plan and does not require a policy to be considered/ 'hung off' or implemented by the Council. Consequently, its inclusion within this Plan is not considered necessary or appropriate. In the past (c. 20 years ago), the Authority still had a modest grant scheme. Budget pressures and reduced

resourcing ensured that this fell away. It is neither a current priority for the Authority, nor is it likely to be prioritised or returned.

- Consequences for unauthorised works to listed buildings, and the demolition without consent of unlisted buildings in Conservation Area, are matters for planning enforcement, and are already handled robustly by the Authority without a policy requirement to do so within the existing Local Plan. Consequently, it is not considered necessary to address this issue with a dedicated policy in the new Local Plan.
- The LPA has engaged positively with Historic England at the Reg 19 stage, soliciting commentary on this new range of improved replacement heritage specific policies, making a number of changes to their draft wording as a result, and seeking a Statement of Common Ground to ensure consistency with national Policy.

Strategic Development Sites

S1 Portsmouth City Centre

A2.309 Portsmouth City Centre is recognised as a centre of importance for new development in the City and in the sub-region. Given its importance to the City and wider region, the Council is committed to the regeneration of the City centre to create a thriving, attractive, and vibrant environment for its residents, businesses, and visitors.

A2.310 Policy S1 sets out the estimated development capacity of the City centre, proposed development options and draft key principles for proposals within the draft Portsmouth City Centre 'identity areas' for consultation.

A2.311 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S1.

Question 32a: Do you agree with the proposed identity areas and key opportunities for the regeneration of the City centre?	
	No. of respondents: 52
Yes	37
No	11
Not sure/don't know	4
Question 32b: Do you have any further comments or suggestions about the suggested identity areas and key opportunities for the regeneration of the City centre?	
	No. of respondents: 39

A2.312 Responses to Question 32b include: Parking-related issues; more cultural and leisure facilities/uses; more health/community facilities; more Green Infrastructure; need for more housing; negative comment about identity area name(s); public transport

issues; improved retail; employment uses; negative comment about design/aesthetics of building or public realm; negative impact of City centre on City reputation; negative comment about the University; more food and beverage provision; wider scope needed; higher density/scale needed; encourage active modes of travel; negative comment about proposed housing numbers; negative comment about student accommodation; shift away from retail focus.

A2.313 **University of Portsmouth:** welcomes the proposals to enhance the vibrant nature of the City centre, which is critical for the University. The University also strongly supports the statements made in paragraphs 3.6.5, 3.6.8 and 3.6.11 and would welcome proposals to support these ambitions to address the issues raised; the vision and site specific proposals for the area are broadly supported by the University. Identifying this area does however demonstrate how an opportunity is being potentially missed by not including the wider parts of the City centre campus as a specific strategic development site and/or campus designation. This can be linked to the University's masterplan as a guide to the level of growth that can be achieved. For the reasons already explained, it will also provide a basis to inform and support the consideration of future planning applications.

A2.314 **Persimmon Homes:**

- The Policy does not clarify across what period the proposed number of units is expected to be delivered.
- Paragraph 3.31 of the Housing and Economic Land Availability Assessment (HELAA) (July 2021) indicates that the combined capacity of the City Centre sites is 5,183 new homes. This correlates closely with the lower end of the range set out in the Policy S1, but does not reflect the disaggregated supply data set out in Table 2 of Appendix 1 of the HELAA, which suggests that only 4,934 dwellings can be delivered from City Centre Sites across the period 2020/21 – 2041+.
- In light of the Council's own evidence base, the expected capacity of SP1 should be expressed as an 'aspirational' range of between 4,934 to 6,128 dwellings.
- Whilst it is accepted that Local Plans should be aspirational, they must also be deliverable.
- Whilst it could be reasonably argued that the City Centre sites are potentially suitable for housing, the same cannot be said with regards to their availability and viability within the plan period.
- Turning to viability, the Council has produced a Development Viability Assessment (October 2020) that supports the publication of the Draft Plan. Whilst we have not interrogated the assumptions underpinning this model in detail, it is clear that that the City Centre area high density development (as has been proposed in the Plan and the Council's City Centre) is unviable.
- If one looks at the availability of sites in the City Centre, multiple ownership exists. The Council has provided no evidence to indicate that the various landowners are willing to bring forward their land forward for regeneration nor an assessment of legal impediments regarding the sites' delivery.

- Portsmouth City Centre Masterplan Supplementary Planning Document (SPD) was adopted on 7th January 2013 - even with this specific SPD the area has failed to provide a meaningful number of additional dwellings.
- In conclusion, using the Council's own evidence alongside Persimmon's own analysis, it is clear that, for the most part, there is currently little appetite for landowners to explore redevelopment of their property in the City Centre area.
- Based on the above, the Policy S1: Portsmouth City Centre is not deliverable/developable and should not therefore be counted towards the Council supply set out in Table 2 of Policy H1. This will leave a significant shortfall that will need to be addressed elsewhere in Portsmouth or in the neighbouring areas as part of the duty to cooperate.
- Therefore, Policy S1 – Portsmouth City Centre, fails the Test of Soundness as the policy is not justified as an appropriate strategy when considered against proportionate evidence as illustrated above. It should also be considered as not being effective as there is no evidence supporting prompt deliverability.

A2.315 **Historic England:** :

- We have a number of concerns about the approach to this policy and the associated City Centre Development Strategy (CCDS). We consider that this policy is currently not sound.
- While we understand the intent to regenerate the City centre and recognise that it is a sustainable location for growth, we are concerned that Policy S1 is very high level, in terms of setting out development parameters, with most of the detail set out in the CCDS.
- We accept that the local plan cannot contain all the requisite detail, but we are not clear on the Council's approach to consulting on and developing the CCDS, nor whether it will indeed be adopted as a supplementary planning document. This is concerning because the CCDS has the potential to usher in significant change in Portsmouth.
- We would prefer to see a set of development sites identified in the local plan itself, rather than the area-based approach currently employed. This would ensure that sites are given due scrutiny through the plan-making process.

A2.316 **Portsmouth Cycle Forum (PCF):**

- PCF welcomes the broad approach to the redevelopment of the City centre, especially the desire to reduce the requirement for private motor transport within it. However, as with our comments about Sustainable Transport Policy, there is a lack of confidence in the ability of PCC to actually deliver the vision outlined within 'the 15-year implementation horizon'.
- We absolutely agree and approve of the following:
    - The overall pedestrian and cycling network is of mixed quality and discourages walking or cycling across the City centre.
    - Large parts of the City centre are currently car-dominated at the expense of good placemaking and environmental quality…There are clear benefits to reversing this pattern with a fundamental shift to creating places for people.
    - The master plan area should be designed for pedestrians first and public transport second.

- We are however concerned that the main gateway to the north does not acknowledge the Transport Assessment requirements of the junctions currently in place based upon the projected increases in use.
- Vehicles arriving from the M275 will enter place-based streets which are multi-modal. There are currently seven lanes of carriageway at Mile End Road but we do not see any way in which through traffic to either the seafront, Isle of Wight Ferry or Gunwharf Quays will be reduced to the level required to make the 'People Friendly Streets' a reality. We do acknowledge that the removal of public car parking is a dis-incentive to travel into the City centre. However we are assuming that Cascades car park will remain in at least the medium term for this strategy.
- The existing City centre is particularly poor for direct walking and cycling permeability and connections. It is also important that future routes should be designed for connectivity in both directions. Just because it works in one direction does not necessarily mean that it is as simple when travelling in the opposite direction.
- There should be more awareness about connecting the City centre walking and cycling routes through the international port. Foot and cycle passengers for europe-bound services are likely to arrive by train at either Portsmouth and Southsea (which has the added issue of accessibility from its high level platforms) or Portsmouth Harbour.
- A well designed and signposted route should be highlighted through the City centre.

A2.317 **Portsmouth Labour Group:**

- There has so far been wholly inadequate community engagement around the proposals being brought forward for the City centre. We believe strongly that existing residential communities and businesses in the vicinity should be closely involved in the regeneration of the area so that it is ensured that the new development complement and corresponds to what is already there as opposed to being inserted into the area in isolation.
- Given the Council will be the landowner of this site it is essential that significant levels of affordable housing, well in excess of the 30% required of a private developer, are delivered.
- We are also concerned about the potential for reduction in employment and enterprise space and would request wherever possible consideration is given to protecting commercial or community use at ground floor level with residential properties built above.

A2.318 **Union4 Planning:**

- Redevelopment of the identified City centre area, as set out at section 7, is strongly supported. The area comprises previously developed land in an accessible location and is therefore clearly suitable for a diverse mix of uses and should be the focus of higher density development and the provision of a significant number of new homes.
- Whilst the 'Location for Tall Buildings' designation has been removed since the 2012 iteration of the proposals map, a precedent for tall buildings has been established in this central area with a number of recently completed developments and planning consents, including student accommodation at Catherine House, Stanhope House, and Crown Place, rising to 28 storeys in some cases. As such, it is considered that

there is significant scope for sites within the identified centre (zones A-E) to accommodate tall buildings, particularly around Portsmouth and Southsea Station.

- As such, the principle of the Identity Areas as the focus of development and the ambition to provide significant additional residential units and employment floorspace within this central area is supported. It is however considered that the focus should be on accommodating taller (subject to achieving high quality design), residential led development across the Identity Areas, as far as possible, as it is clear that the CCDS document is already fairly dated in terms of building heights, built form and land use, with recent consents coming forward which deviate significantly from the draft masterplan.
- Paragraph 7.1.24 of the emerging Local Plan centres development around public transport provision, particularly the train station and bus network. On this basis, it is considered that the sites immediately to the north of the railway tracks are key to delivering this vision, being in closest proximity to both the train station and major bus route and being suitable for landmark development which would act as a way-finder.
- At present, there is no real ‘arrival’ point for those arriving at and exiting Portsmouth and Southsea station, with immediate views on arrival, towards the City centre, comprising the Matalan warehouse style building and an open car cark, contrary to the ‘Big City Arrival’ point as sought by the CCDS.
- On the southern side of the station, the Unite Student Housing development on Greetham Street rises to 25 storeys and acts as a key marker for the station and landmark building, stepping up in height towards the western end of the site, nearest the station. This is considered in the CCDS document as being a ‘Standard Bearer’ of City identity.
- Given the above, the CCDS document misses the opportunity to optimise development in this location, proposing medium rise development to the north of the station and to the north of Station Street. Approval and emerging schemes to the north of Station Street already significantly exceed some of the heights discussed in the CCDS, so to a degree, the evidence base document, adopted in January 2021, is already outdated.
- Whilst there is a clear requirement to respect the listed station and its setting, development to the north of the railway line should look to mirror that already completed to the south, in terms of general bulk, scale and massing, creating a strong arrival point at the heart of the City and a crescendo in building heights around this key transport hub. The indicative masterplan, suggesting heights in the region of 8-10 storeys to the north of the railway line significantly misses this opportunity to landmark the station and provide a high density of accommodation on a highly sustainable site.

Question 33a: Do you agree with the proposed overarching principles for the redevelopment of the City centre?	
	No. of respondents: 43
Yes	32
No	9
Not sure/don't know	2
Question 33b: Do you have any further comments or suggestions about the proposed overarching principles for the redevelopment of the City centre?	
	No. of respondents: 43

A2.319 Responses to Question 33b include: support local businesses and industries; negative comment about student accommodation; improved retail; improved rail; negative comment about proposed housing numbers; improved road/street design; utilise Site A (Landport Gate) for Port development; conserve/enhance heritage assets; higher density/scale needed; higher design standards needed; population density already too high; encourage active modes of travel; more Green Infrastructure; negative comment about University; comment about lack of detail in Plan; regenerate existing buildings/facilities; develop priority/affordable housing only; parking-related issues; public transport issues; low carbon emissions; better transport access needed; better mobility accessibility needed.

A2.320 **The Guildhall Trust:** Overall, the Plan recognizes that there is a serious imbalance of retail, accommodation, and business opportunities across the City. The current provision of retail in the City centre is generally sub-standard and does little to encourage local people and visitors to value it as a 'destination'. We welcome new development in the town centre especially the mix of accommodation alongside an improve retail, leisure, and entertainment offer. As operators of the Guildhall, we feel that improvements and additions to our facilities including new commercial restaurants will aid local regeneration and prove to be a driver for further development in and around Guildhall Square.

A2.321 **Portico Shipping Ltd:**

- Introducing higher residential buildings within relatively close proximity (as suggested in para 7.1.12) would, over time, introduce potential conflicts (visual amenity, light, acceptable neighbourly uses) and could impede the longer term future activities of the Port. This risks longer term detrimental impact on the local economy.
- Supporting Document "Economic Employment and Commercial Needs etc" concludes that there is a shortage of industrial and logistics accommodation (para 4.40) and it is surprising that this has not been considered for the areas adjacent to the Port, being a "key hub", in this Policy.

- The Policy makes little reference to the themes of the "Portsmouth Economic and Regeneration Strategy 2019-2036" (Supporting Document). This study recognises the benefits of the Port and outlines the ambition to "Create a marine and maritime engineering and/or clean growth innovation quarter." The Policy appears to ignore much of the analysis and conclusions of this study.
- The Port forms an important part of the "Solent Freeport" announced by the UK Government early in 2021. This is a significant initiative, considered further under Employment Policy below, and requires Portsmouth City Council to consider future port growth and needs if it is to benefit. Areas included in Policy S1 would be well suited to this initiative by reason of their proximity to the Port, Portsmouth University, and major highways. It would be a significant oversight, in our view, if the wider Freeport needs were not also considered as part of this strategic development opportunity.

A2.322 **Vanguard Storage Services Ltd (via agent):** Overall and subject to consideration of the above the overall principles are agreeable; while the Council's need for housing is noted, this also needs to consider the relevant parts of the NPPF and also look more closely at the promotion of mixed uses and solutions and uses which are complementary.

A2.323 **University of Portsmouth:**

- When the level of development that is identified in the University's masterplan in those areas not identified in the current Local Plan is then added to the capacity identified in the CCDS, the net increase in education floorspace that can be achieved in the area will far exceed the 700 sq.m identified in Policy S1. The level of investment and benefits that will ensue from this development will make an important contribution to the regeneration and growth of the City Centre. It is therefore essential that the campus area is identified specifically as part of the City Centre to provide a framework for this growth.
- The identification of the University in Area E criterion v. is welcomed together with how a positive approach will be taken to opportunities for enhancement and estate development. For the reasons already explained, the University's ambitions and City centre campus is not limited to this area so it should be extended to include the overall campus.
- The University support the vision as set out in the section 4 of the Consultation Document, in particular the encouragement of cycling and walking routes, ensuring the City is safe for both cyclists and pedestrians. The reduction in the overall dominance of the car is also welcomed (see paragraph 4.3.18). The University also welcomes the approach towards an integrated and sustainable public transport system, removing barriers to walking, cycling and public transport (see paragraph 4.3.37).

A2.324 **Morrisons (WM Morrison Supermarkets Plc) (via agent):**

- Overall, Morrisons supports the ambitions of the Council, the intentions to create a 15 year development vision for Portsmouth City Centre and in particular the significant growth requirements. We would like to raise a number of points to ensure the future of the Morrisons store continues to provide an important facility to local residents.

- The existing Morrisons store has a floor area of approximately 5,000sqm (54,000sqft), which provides services to local residents and the wider population of Portsmouth. As such, Morrisons may seek to deliver a replacement store of a similar scale should the site come forward for redevelopment. This would also include a home delivery function, the demand for which has increased significantly over the past 12 months. The delivery of a store will allow for the continued provision of essential goods to residents of Portsmouth.
- Morrisons have also committed to Net Zero greenhouse gas emissions by 2040 and they recognise the way they build new stores will play a significant role in meeting this target. Morrisons are looking at a whole range of measures including photovoltaic roof panels, heat pumps, electric vehicle charging, rainwater harvesting and better cycle facilities.
- We note the Council wish to deliver a shift towards sustainable transport (as per principle viii and draft Policy C3), which Morrisons supports. However, the availability of customer parking in safe and convenient locations is vital to the operation of Morrisons supermarkets. We would stress the importance of adequate levels of parking for the use of customers as this is essential to the operation of Morrisons supermarkets.

A2.325 **Public Health England:**

- All being well, the correct use of preceding policies should mean that all strategic development considers health and wellbeing issues as a matter of course.
- Public Health are already engaged in ongoing work on several strategic sites and have previously made representations to consultations for Cosham, St James' and Tipner, but to highlight the key messages:
    - Air quality, reducing vehicle dominance and car use must be a priority for all strategic sites, but particularly those already in higher density areas of the City.
    - There is a clear expectation that Strategic Development site proposals pay close attention to, and clear adherence with, the Health Pollution and Amenity Policy.
    - Note that the strategic site policies all refer to active and sustainable travel infrastructure, but question where the overarching policy provision is to ensure that they are all connected and that wider infrastructure improvements are made beyond site boundaries to enable a high quality, functioning network.
    - All strategic sites need to ensure they are providing opportunities for, and not adversely impacting upon, existing communities - this can be addressed through Health Impact Assessment.
    - For all strategic sites, Public Health fully supports proposals for off-road active routes (particularly emphasised in Policy S3: Fratton Park and the Pompey Centre). Further policy provisions for clear segregation between cycles/scooters and pedestrians are encouraged wherever possible, as well as the role of greening to be recognised as a way in which to improve the amenity value of these areas (to encourage walking and cycling).

Question 33c: Would you like to see a clear design identity across the City centre (or within each identity area), or more design variation?	
	No. of respondents: 46

A2.326 21 respondents indicated support for a 'clear design identity across City centre'. Comments include: would tie the areas together; standard design focusing on Portsmouth's naval history with a modern application; as long as it is sympathetic with older or historical buildings.

A2.327 Five respondents indicated support for a 'clear design identity within each identity area'. Comments include: more specific statement to exactly what will be built and where.

A2.328 Seven respondents indicated support for 'more design variation'.

A2.329 Respondents provided other comments, including: negative comments on state of Commercial Road/City Centre; need for more retail; positive comment on proposed Fusion scheme on Arundel Street; good to have Portsmouth identity but areas have individual styles; iconic designs for key features - 'low-key'/restrained for rest; too large an area for too prescriptive design identity - innovation and creativity should be encouraged in the centre; coherence would indicate vision and purpose - conformity is boring; approach City centre holistically - make pedestrianised, cycle-friendly with no vehicles apart from public transport/deliveries; utilise 15-minute neighbourhoods concept and high-quality public realm.

A2.330 **Vanguard Storage Services Ltd (via agent):** While the press for design codes, and “beauty” is noted this needs to respond to market demand and the type of development which is come forward. In key locations as noted by the PCCDS schemes should seek to be of high quality and landmarks to the various entry points. The design typology should be City wide and high quality and should not seek to control or stifle innovation.

Question 33d: Do you agree that the average height of development should be six storeys as proposed?	
	No. of respondents: 53
Agree	18
Higher than 6 storeys	15
Lower than 6 storeys	14
Other	6

A2.331 Comments received include: as long as tall buildings not all together as they block sky and funnel pollution; a mixture of 6-storeys and above 6-storeys; as long as adequate parking is considered; depends where and what its use is for; tower blocks could provide more open, green space; mid to high rise have safety implications; should be site appropriate.

A2.332 **Vanguard Storage Services Ltd (via agent):** agree that the average height of development should be six storeys. This appears slightly contradictory with the key locations proposals, moreover it will also depend on uses and values. 'The average height of development should be lower than six storeys' given the significant constraints for what is an island City and the findings of the PCCDS this would seem to be contradictory.

A2.233 **Morrisons (WM Morrison Supermarkets Plc) (via agent):** The average height of development should be higher than six storeys.

A2.334 **Union4 Planning:**

- Whilst it is acknowledged that the CCDS images are indicative, they indicate the same form of medium rise block immediately to the north of the railway line, as they indicate across the wider centre and residential areas in the northern zones of the City centre (zones A, B and C). These are clearly very different areas and the form of development should not be replicated across the central area, especially given that each of the 5 areas (A-E) are identified as 'Identity Areas'. Whilst medium rise rectangular blocks are suitable for certain areas, they are not considered suitable for the main central area of the City and key arrival point around the transport hub, where building heights should be optimised.
- In terms of use, it is noted that the indicative masterplan, and likewise the emerging Local Plan, identify the land to the north of the station for commercial development. Whilst a degree of commercial floorspace and active ground floor uses, particularly towards the western end, nearest the station, may well be suitable in this location, this is not an area for speculative office accommodation and certainly not to the scale envisaged by the draft Masterplan. Whilst there may be potential for a quantum of office floorspace in this area, designed in a bespoke manner to accommodate an identified tenant, this would not be viable as a speculative development.

- As such, with regard to point D of policy S1 and question 37, it is suggested that the wider area should be identified as residential led mixed use, to optimise the number of new homes provided in this highly accessible and sustainable location, whilst allowing for the provision of employment floorspace as the market demands. The housing target envisaged under this part of the policy appears slightly unambitious, particularly given the number of units that have already been provided/approved within this zone. Density and height should be optimised in this key location.

Question 34a: Which development option do you think should be further considered as for the future of the Herbert Street / Victory Retail Park Regeneration area?	
	No. of respondents: 51
Option 1 - Residential-led	11
Option 2 - Residential and employment uses	26
Option 3 - Employment uses	12
Other	2

A2.335 **Portico Shipping Ltd:** We endorse Option 3 - the presumption that "land to the west" of Landport Gate includes areas currently in port use and for related activities. The scenarios posed by Options 1 and 2 of this policy are of particular concern as they appear to risk introducing neighbouring activities that are not compatible with the proximity and operational nature of the Port (and, indeed, the adjoining Naval Base). The primary areas affected are Landport Gate and City Centre North, and these responses are broadly aligned to questions 32, 33 and 35 of the Consultation.

A2.336 **Vanguard Storage Services Ltd (via agent):**

- Option 2 - Para 7.1.19 states "This area is currently bounded by the A3 Mile End Road, Princess Royal Road, Flathouse Road, and Hope Street, which create a physical 'severance' from this area to the surrounding areas." One of the key factors that is omitted is consideration of the heritage assets and the implications that this has on the site. This will need to be factored into any development.
- As both the landowner and current operator of the site Vanguard have no record of being contacted as part of the proposed allocation. Nevertheless, they would like to use this opportunity to propose that option ii) would be the most logical and would offer the best way to allocate the site with mixed use developments. Vanguard have every intention of pursuing planning permission to provide a new high-quality well-designed storage facility on the site. It would seem that given that they are integral to the allocation coming forward that their needs and requirements should form part of the overall strategy for its regeneration.
- One of the key parts of the evidence base in relation to this policy is the Portsmouth City Centre Development Strategy (January 2021) (PCCDS). This notes that the site is one of the key points of arrival in the City, a sensible approach to this would be to

ensure a mixed use that responds to this, with this in mind the Council should also seek to consider how this would work given the constraints, and whether any of these constraints can be removed or considered, such as the conservation area boundary. The PCCDS also sets out that the site is underdeveloped and "presents a degraded and downbeat environment" (Page 16). It is clear that with the right allocation, and with a willing landowner that the site is capable of being delivered for the benefit of the City with a high-quality mixed-use development.

A2.337 **Morrisons (WM Morrison Supermarkets Plc)** (via agent) comments include: Morrisons support either Option 1 or Option 2 as consider that their site has the potential to deliver a significant quantum of housing that would contribute to the City's ambitious housing delivery targets. However, as per below we would suggest that the plan allows for a phased development to ensure the deliverability of development.

Question 34b: If residential-led (Option 1), do you agree with the proposed scale of development?	
	No. of respondents: 22
Yes	11
No	4
Other	7

A2.338 Eleven respondents indicated agreement with the proposed scale of development. Comments include: concern if traffic going through will cause pollution; public transport links.

A2.339 Four respondents indicated disagreement with the proposed scale of development. Comments include: area is unsuited for residential development – too close to M275 and dockyard and port; would cause businesses to have to relocate to other less suitable sites; high-rise buildings close to dockyard would pose security and safety concerns.

A2.340 Other comments include: high-rise buildings increase sense of stress and claustrophobia; not sure road system able to cope – congestion at peak times is bad; wrong place for residential without significant road changes; concern over proximity to poor air quality for future residents; needs to be higher and more ambitious.

A2.341 **Vanguard Storage Services Ltd (via agent):** This really does not express scale but quantum, in any event the scale/quantum could be the same irrespective of the proposed option chosen.

A2.342 **Portsmouth Climate Action Board:** Our concern is the proximity to poor air quality for anyone living in this proposed area.

A2.343 **Morrisons (WM Morrison Supermarkets Plc) (via agent):** Morrisons agrees with the indicative scale of development, however the policy / allocation should not place a strict limit on the scale of development, should a larger scale development be justified on design, visual amenity and indeed viability grounds.

Question 34c: Would the Herbert Street / Victory Retail Park Regeneration area be suitable for a new linear park?	
	No. of respondents: 39
Yes	20
No	8
Don't know/unsure	8
Other	3

A2.344 20 respondents indicated agreement to Q34c. Comments include: any additional green space is a good thing; essential to have some park/green space in the area; should maximise park land but perhaps strips of pedestrianised green space would be enough to leave space for homes and employment.

A2.345 Eight respondents indicated disagreement to Q34c. Comments include: should be employment use, particularly Portsmouth Port; more suitable as a shopping centre with residential complex on top.

A2.346 Other comments include: opportunity to green the City is welcome but should not be as a token gesture towards environmental concerns; not unless accessibility was improved; should connect the port to the City centre.

A2.347 **Vanguard Storage Services Ltd (via agent):** This would not be achievable and relies on the sites coming forward collectively and not necessarily by the existing landowners who may have differing aspirations. While the need for open space for residential uses is paramount this needs to work with the delivery of the proposals as a whole and not act as a barrier to development. This could end up being a very restrictive requirement which is counter productive and blighting the site for delivery.

A2.348 **Portsmouth Climate Action Board:** We believe it is essential to have some park/green space in this area.

A2.349 **Morrisons (WM Morrison Supermarkets Plc) (via agent):** Morrisons supports the principle of a linear park in this location as this would serve future residents, however given the desire to re-provide the Morrisons store on site we would need to consider the design / layout implications of this in more detail going forward.

Question 34d: Do you have any other comments on the approach to the future of the Herbert Street / Victory Retail Park Regeneration area?	
	No. of respondents: 18

A2.350 Responses to Question 34b include: more Green Infrastructure; safeguard for Port development; highway infrastructure issues; improve links with rest of City Centre; improve air quality; proposals for education/healthcare space are needed for rest of City; retain supermarket; more detail plan required.

A2.351 **Portico Shipping Ltd:**

- Ports are, by nature, quasi-industrial, and operate on a 24 hour period throughout the year. The operational aspects of light, noise and traffic are different to standards required for residential and related mixed use sites, and it follows that promoting new development of these uses, as set out in Options 1 and 2, would be materially incompatible and detrimental to the Port.
- The Policy fails to recognise or consider the needs for expansion of uses and activities that support the growth of the Port (for example, warehousing, open storage, supporting engineering and other facilities). The City is, quite rightly, seeking to improve air quality, and for the Port to be able to respond, and introduce new technologies to help meet more stringent targets, suitable adjacent land allocations will be needed, which the Plan should take into account.
- The proposed Landport Gate layout has serious implications relating to existing traffic access to the port and its main access gate (and, of note, Landport Gate actually takes land that is currently owned by Portico).

A2.352 **Portsmouth International Port:**

- Other than Tipner, we would like to re-emphasise our proposed land use for the following areas within the PCC area:
    - Area A: Hughes and Salvage Scrap Yard Area – Circa 0.6Ha;
    - Area B: North of Morrison Site and Industrial Employment Area -circa 1Ha.
- Both sites are strategically placed south of the Portico terminal which are ideal for future expansion of the boundary and operational area of the Port. We would like to formally request for PCC to consider the potential utilisation of both these sites indicated for future port development purposes in the Local Plan. The exact amount of land that can be allocated from these sites can be further discussed at the next stage of consultation.

A2.353 **Historic England:**

- The CCDS identifies nine new blocks in this area. Six of these are six storeys, with a 20-storey building at the southern end and ten and 15 storey buildings at the northern end.
- Our modelling indicates the 10, 15 and 20 storey buildings, would be visible above the roofline of buildings located in the 5 Mile End Conservation Area. These buildings include the grade I Charley Dickens Birthplace Museum and a number of grade II listed buildings. The conservation area and the buildings within it are significant for a number of reasons, particularly for interrelated historic and architectural values: the area offers a glimpse of a part of Portsmouth at the time of the birth of one of the City's most famous sons. The juxtaposition of this remnant Old Commercial Road with the A3 beyond and the built environment south along Commercial Road is a stark one. This area manages to remain a haven of relative tranquillity. New buildings visible above the roofline would represent an unwelcome intrusion and would harm the significance of the conservation area and the buildings within it.
- In order to ensure new buildings are not visible above the roofline from within the conservation area, our modelling indicates that the 20 storey (LPG9) building should be reduced to six storeys and the 15 storey (LPG2) building reduced to eight storeys. The 10 storey LPG1 should be reduced to 8-9 storeys. To compensate for the reduced capacity in the aforementioned buildings, LPG3, LPG5 and LPG7 could be increased to 8-9 storeys and LPG 4 and LPG 6 could be increased to eight storeys. If any of the proposed blocks are relocated, building heights would need to be revisited.
- In the past consideration has been given to relocate the A3 west of its current location, along Flathouse Road. The CCDS does not mention this. This would seem to be a missed opportunity. Relocating the A3 along the alignment of Flathouse Road would remove a significant barrier between the new development and the existing residential areas of Landport, which would be all the more apparent should this area be redeveloped to include a significant element of residential. The 'physical severance' is recognised in the CCDS but it is not addressed, except for via better north-south connection. As proposed, the new development would be like a peninsular, with only one entry and exit point, to its south. In order to function well as a place, it should have better connectivity to the east. This could perhaps follow historical streets such as Pitt Street and Herbert Street (currently curtailed by the A3).

A2.354 **Morrisons (WM Morrison Supermarkets Plc) (via agent):**

- Morrisons note that the opportunity area covers land within their ownership, however it also includes third party land to the north. Whilst we appreciate the Council's desire to deliver a comprehensive development across the area, we would suggest that the plan allows for a phased development to ensure the deliverability of development. We would also stress the importance of continuity of trade of the Morrisons store during the delivery of the development itself.
- In respect of the delivery of new housing, we would suggest that the Local Plan and policies in relation to this site adopt a flexible approach in respect of housing mix / tenure. The draft Local Plan confirms the need to deliver a variety of housing throughout the City to provide a choice of high-quality homes and to create inclusive,

mixed and sustainable communities. In addition to open market housing, we consider that the site has scope to deliver Build to Rent as well as accommodation for students and the elderly.

- We note the draft Local Plan acknowledges the benefit of bespoke student accommodation which helps free up other residences currently occupied by students. The draft Local Plan confirms that the provision of purpose-built student accommodation potentially allows for the release of Home in Multiple Occupation (HMOs) back to much-needed family homes. In light of this and given the location of the site we consider that there is scope to provide student accommodation on the current site, potentially as part of a mix of other residential accommodation.
- We consider that Build to Rent housing is a further option for this site. The Local Housing Needs Assessment confirms that this type of housing can meet the needs of a number of demographic and social groups within the community. The draft Local Plan also confirms that Build to Rent schemes have the "advantage of being able to offer longer term tenancies for those who want them (sometimes known as 'family friendly tenancies') providing longer term security and stability."
- Finally, we also consider that the site has the potential to deliver accommodation for the elderly. Again, the Local Housing Needs Assessment identifies a growing demand for specialist elderly accommodation in Portsmouth. Based on our initial review, we consider there is scope to deliver retirement living as part of mixed tenure development, in particular extra care accommodation.
-

Question 35a: Do you agree with the proposed types of uses and the scale of development for the City Centre North Regeneration area?	
	No. of respondents: 46
Yes	32
No	6
Not sure/don't know	8
Question 35b: Do you have any further comments or suggestions about the proposed types of uses and the scale of development for the City Centre North Regeneration area?	
	No. of respondents: 20

A2.355 Responses to Question 35b include: new leisure centre; traditional market; more residential; employment space on ex-Sainsburys site; wholly for employment space; more employment opportunities; residential on ex-Tricorn site; support for linear park continuation; luxury residential accommodation; negative comment about proposed housing numbers; release Cascade shopping centre for alternative uses; more Green Infrastructure; greater mix and diversity of uses; more building height; more public spaces; improved retail; relocate Tesco from Crasswell Street to allow for existing store to be redeveloped; parking-related issues.

A2.356 **Historic England:**

- This area includes the grade II* St Agatha's Church. The is a current planning application (and listed building consent application) for St Agatha's to be extended to both the north and the south. New development should respond positively to the extended church, if consented. The block shown in both the local plan and the CCDS does not respond successfully to St Agatha's in either its current or extended form. This is because the section of block NLP7 that fronts onto Market Way appears too close to the church and the form of the new development does not seem to respond to the layout nor position of the church.
- St Agatha's was previously enclosed by a tighter street pattern (prior to the bombing of the area immediately around the church and the subsequent construction of Market Way). Therefore, a new block pattern that also provides enclosure to the church could be acceptable, if sensitively designed.
- Furthermore, it seems a missed opportunity not to use the church to frame the end of the proposed east-west route between NLP7 and NLP12. Ideally, this route should be realigned with St Agatha's and the church can be viewed from the eastern end of this route the new square). This would be an example of using the historic environment to help shape new development and thereby improving the design quality of the new place. This would be part of the plan's positive strategy for the conservation and enhancement of the historic environment.

Question 35c: Would the City Centre North Regeneration be suitable for a new public square?	
	No. of respondents: 36
Yes	23
No	7
Other	6

A2.357 23 respondents indicated support for a new public square. Comments include: nice place for markets/events/etc where shown; as long as properly policed; if there is enough space; more places for creative uses and bringing communities together.

A2.358 Seven respondents indicated opposition for a new public square. Comments include: would be better placed in the south of City Centre; already have a square – enough squares already.

A2.359 Other comments include: would prefer Commercial Road into Guildhall Square – should reinvigorate one central location rather than add more; needs proactive engagement with local residents; maybe create a 'Borough Market' type area; would this be a replacement to Guildhall Square or in addition?

Question 35d: (If yes) Where should this new public space be located?	
	No. of respondents: 23

A2.360 Comments to Question 35d include: near Commercial Road/Lake Road; not near main roads/traffic; near St Agatha's; Victoria Park; adjacent built-up residential and F+B; adjacent Charlotte Street; in an accessible area; near University; centred upon existing fountain; outside City Centre area.

Question 36a: Do you agree with the proposed types of uses and the scale of development for the Commercial Road / Arundel Street Regeneration area?	
	No. of respondents: 47
Yes	34
No	7
Not sure/don't know	6

Question 36b: Do you have any further comments or suggestions about the proposed types of uses and the scale of development for the Commercial Road / Arundel Street Regeneration area?	
	No. of respondents: 28

A2.361 Responses to Question 36b include: agree with increased residential density/scale; keep area retail only; better evening economy; better public transport and infrastructure; affordable housing need; improve Cascades shopping centre; new public square; greater building heights; new department store; encourage new businesses; impact on existing businesses; more F+B provision; cater for student population; relocate Tesco elsewhere on Commercial Road; need for more Green Infrastructure; conserve/enhance heritage assets; negative comment about proposed housing numbers; limit future student accommodation development.

A2.362 **Historic England:**

- Cascades Shopping Centre has been excluded from the planned redevelopment of the City centre. While we understand that the current owner may not want to redevelop the area at this time, given the scale of proposed new development around Cascades, it would seem a major omission to not even consider how a redeveloped Cascades might be planned. The CCDS involves the creation of new routes and streets. The opportunity for this type of urban design only comes along rarely and therefore a comprehensive approach to the area should be taken, which fully explores how Cascades might be reconceived in future. In this way, the 'Paradise' area will help shape the development that will, at some point, succeed Cascades.
- The CCDS currently identifies blocks PAR13 and PAR17 as new blocks of six storeys. However, these blocks contain a number of good quality buildings, including two grade II listed buildings. Some of the non-designated buildings may also be suitable for inclusion on the local list.

- We would not support the loss of these two listed buildings. We would recommend that PAR13 and PAR17 be reconsidered with a focus on retention with the potential for some upward extension.

Question 36c: Should the Commercial Road area undergo a fundamental shift from retail to a more diverse range of work, social, and leisure uses?	
	No. of respondents: 48
Yes	33
No	10
Not sure/don't know	5

Question 37a: Do you agree with the proposed types of uses and the scale of development for the Portsmouth & Southsea Railway Station Regeneration area?	
	No. of respondents: 47
Yes	36
No	5
Not sure/don't know	6
Question 37b: Do you have any further comments or suggestions about the types of uses and the scale of development for the Portsmouth & Southsea Railway Station Regeneration area?	
	No. of respondents: 15

A2.363 Responses to Question 37b include: negative comment about design/aesthetics of building or public realm; need to improve active travel infrastructure; new leisure centre; need to consider health/community/education facilities; prioritise housing for local workers; provisions for visitor population and economy; more parking provision; concern over proposed shower facilities; Green Infrastructure; enhance the rail station as a focal point; negative comment about identity area name.

A2.364 **Southern Water:**

- Southern Water has undertaken an assessment of existing infrastructure capacity and its ability to meet the forecast demand for each of the development sites set out in the draft Portsmouth Local Plan 2038. That assessment reveals that reinforcement of the local sewerage network would be required to accommodate 670-770 dwellings at Site D Portsmouth & Southsea Railway Station ('Work-station').
- This is not a constraint to development, provided Southern Water can work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development.
- Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore,

play an important role in ensuring that development is coordinated with the provision of the necessary infrastructure.

- Unless planning policies support delivery of the network reinforcements required to accommodate new development, there is a risk that it will not be delivered in tandem with development, leading to an unacceptable risk of foul water flooding to both new and existing residents. This situation would be contrary to paragraph 174(e) of the NPPF (2021), which requires the planning system to prevent both new and existing development from contributing to pollution.
- Therefore, whilst a lack of capacity is not a fundamental constraint to development, planning policies should ensure that new or improved infrastructure will be provided in parallel with the development.
- We therefore, request the following provision be added to D – Portsmouth & Southsea Railway Station ('Work-station'): Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider.

A2.365 **Historic England:**

- We agree that the entrance to the grade II listed Portsmouth and Southsea Station should be enhanced. However, we are concerned that some of the development proposed to the east of the station, on the Matalan site, would significantly detract from views of the front elevation of the station. This is because new buildings would be visible over the roofline of the station. The Greetham Street development already interferes with views of the front elevation of the station, and the situation should not be allowed to deteriorate further.
- In order to address the above, WKS6, immediately to the rear of the station, should be reduced from eight to four storeys and WKS7 should be reduced from eight to six storeys. The footprint of these two buildings could perhaps be increased, removing the cut-out sections, to compensate for the reduced height.

Question 37c: What else should be considered for the enhancement of the appearance and setting of the Portsmouth and Southsea Railway Station as a key arrival 'gateway'?	
	No. of respondents: 29

A2.366 Responses to Question 37c include: more Green Infrastructure (trees, planting, etc); enhance area around station; conserve/enhance historical aesthetics of building; enhance public/active transport access; new culture facility or activities; better visitor information provision; integrate station better with surroundings; better access/drop-off for passengers; enhance station platform and bridge; improve station/rail energy efficiency and use of renewable energy; modify Civic Office building to connect area better with Guildhall; utilise Matalan site for station use; improve links with other City areas.

Question 38a: Do you agree with the proposed types of uses and the scale of development for The Guildhall & Victoria Park Area Regeneration area (including the redevelopment of the law court/police station area to residential)?	
	No. of respondents: 48
Yes	28
No	11
Not sure/don't know	8

Question 38b: If you disagree, what should the future for The Guildhall & Victoria Park Area Regeneration area look like?	
	No. of respondents: 18

A2.367 Responses to Question 38b include: concern over whether law courts are reprovisioned; enhance Green Infrastructure provision; parking-related issues; need to retain police station provision; conserve Victoria Park; release Civic Offices for redevelopment; move Civic Offices to existing law court/police station; enhance Guildhall setting; concern whether Guildhall is retained; conserve heritage assets; more site area for the University; City Centre policy needs to include references to sustainable construction/energy; more mixed-use sites

Question 38c: Do you have any further comments or suggestions about the suggested approach to the density of new homes in the City?	
	No. of respondents: 17

A2.368 Responses to Question 38c include: adequate parking provision needed for new homes; agree with higher density; concern over aging infrastructure capacity; concern over whether sufficient health/community/education facilities; concern over impact of high density on future residents; enhance Green Infrastructure; enhance play spaces; negative comment related to City reputation; enhance renewable energy provision; enhance public/active transport infrastructure; enhance access to Victoria Park; traffic-related issues; parking-related issues

A2.369 **Historic England:**

- We recently commented on a planning application for a 12-storey building on the former Victoria Baths site in Victoria Park (ref 21/01129/FUL). We expressed concern over the effect of a 12-storey building on views of the Guildhall and the wider conservation area. The CCDS would appear to seek to establish the principle of a 12-storey building here, without going through any part of the plan-making or development management process, which highlights a problem with this approach.
- We welcome the reestablishment of King Henry I Street directly through to Anglesea Road. New 10-storey buildings (GAV 1 & GAV2) are unlikely to be visible in views of the Guildhall (unlike the aforementioned 12-storey building), but buildings of this

height will nonetheless require careful consideration. For example, 10-storey buildings in this location could harm the setting of the grade II listed Park Building, through appearing dominant to the listed building, due to the difference in height between the Park Building and a 10-storey building. Therefore, we would recommend that these buildings are 7-10 storeys, subject to a heritage impact assessment (7 storeys reflects the height of the existing King Henry Building).

- We welcome the recognition that the Central Library is a key building. While we note that the Council's Local List of Buildings was updated in 2021, the Central Library may merit inclusion on the local list the next time it is reviewed. This should take place before the plan is submitted.
- If the Civic Offices were to be redeveloped, we could support the principle of removing development from the existing northern wing of the Civic Offices as this element cuts across an important pedestrian route. We have some concern about "proposals to add a glassy new side extension" to the Guildhall. We would recommend the Council engage Historic England in pre-application advise for any such application.

Question 38d: Do you agree with the proposed transformation of Winston Churchill Avenue - what else should be included or changed about this space?	
	No. of respondents: 30
Yes	19
No	2
Other	9

A2.370 19 respondents indicated agreement with the proposal. Comments include: boulevard-style would enhance the area; important to work sympathetically with nearby older roads and buildings, e.g. Eldon Street; include areas for community growing, arts, culture, and sport; needs modernisation.

A2.371 Two respondents indicated disagreement with the proposal.

A2.372 Other comments include: making it better for pedestrians would be good; walking from Fratton to this area currently not good, this would improve this; is a significant change that needs more detail and explanation; where will the law courts/other public buildings relocate to?; University presence may over dominate this area; housing density should not overpower surrounding area; is a main thoroughfare for traffic – should look better but pedestrianisation inappropriate; making Mercantile House not on a traffic island is a good idea; create 'walking pace zones' by adding marks on pavement to measure walking distances.

S1 Portsmouth City Centre - interim Council response

The City Centre Development Strategy is the key evidence base document for this policy. The responses from the consultation have shown largely broad support for the approach and principles of the policy, and especially the focus for regenerating Portsmouth City Centre. Perhaps an exception to this is the question on average height of development, where there was more-or-less a split in opinions - and therefore, this will be further considered as an issue through the CCDS work.

Nevertheless, the NPPF requires that planning policies should reflect changes in the demand for land, be informed by regular reviews of both the land allocated for development and of land availability, and consider whether there is reasonable prospect of the use allocated in the plan coming forward at the point envisaged.

Policy Status: **Amber**

There is further work required to substantiate the policy in terms of the deliverability and availability of the allocated sites identified in the draft policy. This includes a review of land availability and demand, consideration of any planning applications granted or coming forward, and consideration of the phasing of land, uses, and development quantum over the identified plan period.

Policy S1 Portsmouth City Centre - Regulation 19 2024Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

The Regulation 18 consultation asked a series of questions related to the proposed allocation. This response addresses each in turn and how they have been taken account of.

32b: Do you have any further comments or suggestions about the suggested identity areas and key opportunities for the regeneration of the City Centre:

- Portsmouth University: Policy PLP6 makes specific mention of the University's Masterplan in response to comments made by the University.
- Persimmon Homes had a series of questions related to housing delivery numbers and phasing, Policy PLP6 contains a monitoring framework which clearly sets this out.
- Persimmon Homes also raises the question of development availability and viability. The Local Plan policy is supported by a series of Statements of Common Ground with site promoters and a viability study that addresses this.
- Historic England raised concerns about the status of the City Centre Development Strategy that underpinned the Regulation 18 Local Plan Policy and specified they

would prefer to see development sites identified. Policy PLP6 is based very much upon specific schemes that are identified and proposed in the City Centre. The revised development areas respond the developments coming forward such as for example City Centre North.

- Portsmouth Cycle Forum raised concerns about through traffic and a lack of connectivity for pedestrians and cycles to the existing City Centre. Policy PLP6 makes specific mention in point C to Improve pedestrian and cycle connectivity to the surrounding residential areas, and to Major Development should provide a travel plan to demonstrate how it is contributing to a shift to sustainable and public transport in in the centre in point M.
- The Union for Planning makes a number of points including referring to the need to make more of Portsmouth and Southsea Station as an arrival point for the City. Policy PLP6 addresses this through the identification of the Station as a focal point.

33b. Do you have any further comments or suggestions about the proposed overarching principles for the redevelopment of the City Centre?

- Portico Shipping raised concerns around tall buildings in the proximity of the Port and the impact on future activities in the Port. The boundary for the City Centre allocation has been redrawn further from the Port reducing this potential impact. Portico also raised the potential for economic uses adjacent to the Port related to Port Activities. The revised City Centre boundary does not prevent these types of uses in the area between the Port and City Centre being consented.
- The University of Portsmouth refers to its Masterplan in the context of its potential to provide additional education space in addition to that identified in the Regulation 18 LocalPlan. Policy PLP6 addresses this by making specific mention of the City Centre Masterplan.
- Morrisons makes specific reference to the protection of the ongoing use of its store. The revised City Centre boundary as included in Policy PLP6 now excludes the location of the Morrisons store.
- Public Health England states that reducing car dominance and use to improve air quality should be a priority. Policy PLP6 makes specific reference to air quality under criterion 2 g and ensures that new development addresses and does not worsen air quality. Sustainable travel and connectivity to the surrounding areas is mentioned by Public Health England and this is specifically dealt with under point 2c of Policy PLP6. Health Impact Assessment (as part of an Integrated impact Assessment) has also been carried out for the plan in line with Public Health England's comment.

33d. Do you agree that the average height of development should be 6 storeys as proposed?

- Union 4 Planning thought that the area immediately surrounding Portsmouth and Southsea Train Station could accommodate greater height and density. This is reflected in the approach for the Station Road Regeneration Area set out in Policy PLP6 which encourages good quality, high density and tall buildings.

34a (34b, 34c, 34d) Which development option do you think should be further considered as for the future of the Herbert Street / Victory Retail Park Regeneration area?

- Portico Shipping, Union 4 Planning and Morrisons made comments related to the proposals in the Reg 18 Local Plan for this area. The redrawing of the City Centre boundary between Regulation 18 and 19 has resulted in this area no longer being included as it was felt to be best covered by the City-wide Local Plan policies as it was more a general commercial / industrial area in character as characterised by the responses as opposed to part of the city centre.

35a. Do you have any further comments or suggestions about the proposed types of uses and the scale of development for the City Centre North Regeneration area?

- Historic England have made specific comments about the importance of St Agatha's Church and its setting. Policy PLP 6 makes specific reference to responding sensitively to St Agatha's Church (Grade II*) and All Saint's Church (Grade II) in terms of massing, scale and orientation.

37b. Do you have any further comments or suggestions about the types of uses and the scale of development for the Portsmouth & Southsea Railway Station Regeneration area?

- Historic England have made specific comments in regard to the height of buildings and the impact of tall buildings on the setting of on Portsmouth and Southsea Train Station. They ask for proposed building heights in parts of the Workstation area as proposed in the Regulation 18 Local Plan to be reduced to 6 storeys. The Regulation 19 Local Plan makes provision for tall buildings in the Station Road Regeneration Area (around the station) for two main reasons. The first is the presence of existing tall buildings of up to 20 storeys in the immediate vicinity which sets a precedent for this height. The second is due to the need to provide housing and economic growth to meet the City's needs in sustainable locations within the City, with this area being one of if not the most sustainable location in terms of access to facilities and sustainable public transport.

S2 Tipner

A2.373 Portsmouth's densely populated urban area presents few options for significant, wide scale regeneration; the redevelopment of the Tipner peninsula could present the opportunity to create an exemplary, sustainable community in a prominent location just off the M275 creating a new statement 'gateway' into the City.

A2.374 Tipner is divided by the motorway into Tipner West and Tipner East. Tipner East is the smaller of the two areas, closely linked to the Stamshaw area of the City. It is largely derelict land on the site of a former dog racing track with the benefit of an existing planning permission for 626 homes. Tipner East is also the existing location for Portsmouth's Park and Ride, key to achieving the City's sustainable transport aims. Tipner West includes a former MoD firing range, scrapyard, sailing club, a Special Education Needs (SEN) school and an area currently in use as a lorry park

for the Port. The potential development area also includes the southern portion of Horsea Island, located west of the M275, which is currently scrubland formerly in use by the MoD. The rest of the Horsea Island area is due to open as a Country Park.

A2.375 The existing area is partly derelict, significantly under-utilised and in need of both remediation to address a long history of polluting uses and redevelopment to vastly improve the quality of the environment in this part of the City.

A2.376 The Local Plan 2038 Regulation 18 consultation sought views on three proposals at Tipner which are analysed below:

39a. What should the approach be to the future of Tipner?

Question 39a. What should the approach be to the future of Tipner?		**Object to Option 1 email petition**
	No. of respondents: 91	8,995
1. Innovative Sustainable Community (including.land reclamation)	41	
2. Regeneration of Existing Area	29	
3. Maintain	18	

A2.377 As outlined in the table above, respondents who answered question 39a, via email and the virtual room responses, considered viewed Option 1 as the most favorable approach, followed by Option 2 and finally Option 3. However, PCC received nearly 9,000 petition emails strongly objecting to land reclamation in Portsmouth Harbour (option 1). Respondents who responded via the petition did not support any proposal for land reclamation and only supported options which sought to protect and enhance the site for wildlife. Three respondents believed that none of the options put forward would provide a sustainable future for Tipner.

A2.378 Alternative suggestions included a more suitable alternative to enhance the value of Tipner as an asset to people and wildlife; limited development including marine industry and downgrading the M275.

A2.379 A common theme across all the comments received on Option 1 - 3 was support for a coastal access path, continuing the existing route around Tipner Lake, with links to the Horsea Country Park.

Option 1

39b. Option 1: Innovative Sustainable Community (inc. land reclamation): Do you have any comments or suggestions about the outlined principles and requirements for development'?	
	No. of respondents: 82

A2.380 In total there were 8 responses to this question (excluding petition emails received via email). Responses varied with regards to positive and negative opinions on Option 1.

A2.381 Positive comments included the opportunity, additional land and employment activity this would generate for the City. The main objection to this proposal is in relation to the impact on wildlife due to the loss of designated habitat (inc. carbon storing mudflats) and open space; there is the view that habitat loss cannot truly be compensated for through net gains and that this would set a precedent for the loss of other such areas.

A2.382 The **RSPB** and **Hampshire & Isle of Wight Wildlife Trust** object in the 'strongest terms' to option 1 as these proposals would cause the greatest ecological damage to the area. The mud flats are vital for the biodiversity of the area and land reclamation would create lasting detrimental environmental damage.

A2.383 **Natural England** also objected to Option 1 being delivered due to the adverse effects on the integrity of Portsmouth Harbour SPA due to its significant and permeant loss. This would cause negative impacts on hydrodynamics, coastal processes, loss of habitat and impact on water quality. Further comments by Natural England raised concern for wildlife disturbance on Horsea Island if development were to be progressed here. Natural England believe if Option 1 is to be taken forward, it would not meet the NPPF's four tests of soundness.

A2.384 There are views that either the scheme would be unlikely to meet the legal tests required for it to proceed, attain the funding that would be required for its delivery, or that development/ concept envisioned would not be the one delivered at the application stage, particularly with regard to securing the proportion of affordable housing that the policy would require.

A2.385 The 'car free streets' aspect attracted mixed views. Comments suggested this would need to be supported by priority public/ active transport; large underground car park for all residents and priority car access for key workers and electric cars. There were also objections to 'anti-car' development and an alternative proposal for low speed and low density streets. In terms of other infrastructure there was support for the inclusion of a bridge to Horsea Island (to include lanes for active travel), in

consultation with local residents regarding its usage. It was questioned whether one motorway access link would be sufficient as the main vehicular access.

A2.386 Mixed views on the nature of development for this location; some feel it is ideal for well designed, high density tower blocks. Others would want to see low and medium rise development more in keeping with the wider Tipner/ Stamshaw area. The site's history/ heritage assets should be key features (and promoted as part of the coastal walk) while its location should be utilised for tidal energy.

A2.387 Alternative uses as part of this proposal were suggested: lorry parking provision and other uses associated with the Portsmouth International Port, nature reserve area and a site for camping/ campervans on route to the ferry crossings.

A2.388 Despite reinforcement of the local sewerage network being required as stated by **Southern Water** for Option 1 and Option 2, this is not considered a constraint to development. However, planning policies are required to support the delivery of network reinforcements in order for them to be delivered in tandem with development, reducing any detrimental impact if they are not implemented.

Option 2

39c. Option 2: Regeneration of Existing Area: Do you have any comments or suggestions about the outlined principles and requirements for development'?	
	No. of respondents: 56

A2.389 Option 2 attracted a mix of views ranging from being not as ambitious or 'future proofed' as option 1, a preferable solution for the need for new homes, too expensive or objections on the basis of the impact this would still have on the local environment.

A2.390 **RSPB** and **Hampshire & Isle of Wight Wildlife Trust:** raised the issue that Option 2 did not seem as ambitious in providing sustainable solutions as Option 1. There were fewer sustainability principles embedded into Option 2 when compared to Option 1.

A2.391 **Historic England:** raised further concerns for the significance of the listed buildings on the site and in the surrounding area including views from Portchester Castle and St Mary's Church. The existing view is predominantly undeveloped which should be retained with any development at Tipner being low-rise and a policy condition securing this. They further commented that the policy was unsound given limited evidence to support an allocation of 800 homes and 25,000sqm of employment

space. Evidence should be presented to show how this development will not impact the historic significance of sites.

A2.392 **Natural England:** raised further concerns for Option 2 including the increased recreational pressure of the SPA, impact on the water quality, construction impacts and infrastructure requirements. The derogation test would need to be met to address any losses of habitat.

A2.393 Some would support Option 2 but object to some elements of the proposal such as the loss/ relocation of existing development (the Harbour School) or the scale of employment land given the increased levels of working from home. Others would support variations such as an increase in secured affordable housing provision (40%), expansion to the Park and Ride to both sides of the M275, reuse of existing brownfield land and historic assets for commercial and residential uses and recreational/ habitat enhancements. There was support for including the bridge as critical infrastructure regardless of the scale of development proposed.

Option 3

39d. Option 3: Maintain: Do you have any comments or suggestions about the outlined principles and requirements for development'?	
	No. of respondents: 36

A2.394 There was some preference for this option with many responses suggesting that the area should be maintained and enhanced as a nature reserve, with potential for perimeter public/ cycle access, or for community use that does not harm the environment.

A2.395 **RSPB** and **Hampshire & Isle of Wight Wildlife Trust**: welcome proposals for Tipner that seek no development beyond the existing footprint and secures the site as a valuable natural and community asset, although believe Option 3 does not achieve this. This is not a sustainable alternative to Option 1 or 2.

A2.396 Natural England also believe Option 3 (proposing up to 700 dwellings at Tipner East) will still have detrimental effects on Portsmouth Harbour SPA.

A2.397 Others felt this was not a viable alternative option and the current area is an 'eyesore' that should be remediated and developed for new homes. However, there was a reluctance to go as far as Option 1 and 2 proposed, with comments suggesting that the prime target should be to develop areas in the inner City.

A2.398 A handful of comments raised the option of pushing back against Government's housing figures, as being an island City, it is simply not feasible to deliver the numbers of housing that are being proposed.

39c & d ii. Where instead should the other 2,700 / 3,500 homes and 34,000 sq m / 56,000 sq m of employment floorspace required be located?	
	No. of respondents: 90

Responses to part 2 of Questions 39c and 39d were similar and therefore have been grouped together as a separate question and analysed below.

A2.399 Some respondents felt strongly that the Government should be challenged on the housing target for Portsmouth given the environmental constraints, densely populated nature of the City and limits on infrastructure capacity, or that the market would not support such a level of private new homes in Portsmouth at an affordable level for residents.

A2.400 **RSPB** and **Hampshire & Isle of Wight Wildlife Trust:** did not approve of the question that was being put forward asking for opinions on where else to develop in Portsmouth and highlight the possibility for the Council to make a case for 'exceptional circumstances' and adopt an alternative approach to determining housing need.

A2.401 Most suggested that new homes should be focused on existing brownfield/ vacant plots in the City, or distributed across the City. The City centre was mentioned as having the best accessibility and suitability for higher densities of development and now has additional redevelopment potential due to the decline of retail. Another main suggestion was that development should be 'off island' to 'the north' of Portsmouth (E.g. Farlington playing fields) or beyond the City boundary.

A2.402 Other suggestions included: relocating the Navy from Whale Island; redeveloping Portsmouth Football Club site; redeveloping existing retail parks/ spaces; building more tower blocks/ upward to increase density; and some specific vacant plots: Kwik Save in North End, former Tricorn site, ABC cinema site and the former Pit Street Bath.

39e. Are there any other options for development at Tipner that the Council should consider?	
	No. of respondents: 50

A2.403 Some comments in response to Question 39e were in favour of developing Tipner West given the significant need for housing within the City. These included high rise

tower blocks and the creation of a new 'town hub' with associated infrastructure. Predominantly, suggestions that did support development on Tipner wanted to see it in a highly sustainable fashion to provide an innovative sustainable community. If Tipner West were to be developed, the location of development would have to be carefully considered; it would have to be high quality with the inclusion of affordable units.

A2.404 The **RSPB** and **Hampshire & Isle of Wight Wildlife Trust:** are not averse to truly sustainable development at Tipner West including a sustainable level of affordable homes and marine employment focused within the existing brownfield land that seeks to protect and enhance wildlife and provides much needed greenspace.

A2.405 **Portsmouth Climate Action Board:** believe the site should only be developed within the existing brownfield area with the use of low carbon, sustainable materials.

A2.406 **Hampshire County Council:** supports in principle sustainable development of this brownfield site. Early consultation with Hampshire County Council will however be required along with evidence of low mode-share by car and car free neighborhoods and detailed impacts on the road network.

A2.407 Further comments proposed to develop the site for alternative uses to housing (logistics park, port use, marine employment, miniature nuclear site) with additional development on Tipner East. Others also saw the opportunity for the development of leisure, education and recreation facilities whilst protecting and enhancing the environmental assets on the site to create a nature reserve. Further comments supported development on Tipner East and Horsea Island.

A2.408 **Vivid** and **Bellway Homes** consider that the draft allocation should be separated allowing Tipner East to be delivered without reference to Tipner West (whilst including links to both where feasible). Bellway stated the policy wording should ensure that development within the allocated area at Tipner is able to be come forward in phases.

A2.409 With regards to developing in other areas of the City, further comments proposed developing to the north of the City and extending its administrative boundary, developing the inner City and City centre, focussing investment on the rest of the City.

S2 - Tipner - interim Council Response

Responses received in relation to the three options proposed at Tipner provided an insight into how this policy needs to be developed as part of the next stage of the Local Plan. Whilst there was some support for Option 1, there was a significant amount of opposition predominantly due to the environmental concerns and the impact on biodiversity. Whilst Option 2 was viewed in a slightly better light, concerns were still raised with regards to sustainability. The trend of sustainability issues continued in responses to Option 3.

Not all respondents were averse to development, with a positive outlook on delivering sustainable and sensitively located development (on brownfield land) in order to protect and enhance the existing habitats and SPA.

The Council will consider the most appropriate level and type of development that could be delivered at Tipner whilst providing high levels of sustainability.

Policy Status: **Red**

Policy S2 needs to be reviewed and updated to reflect the comments that were put forward during this stage. The Council will consider alternative proposals for the redevelopment of the Tipner area including options without land reclamation. Alternatives will need to be robustly evidenced, deliverable, in accordance with the Habitat Regulations and able contribute to the growth needs of the City. A full review of the Housing and Economic Land Availability Assessment with a 'Call for Sites' will be undertaken to further explore whether there are alternative locations/ options for housing and employment land.

Policy S2 Tipner - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- The Tipner site in the Regulation 18 consultation incorporated Tipner East, alongside Tipner West and Horsea Island East. Tipner East is now addressed through a separate policy in the Regulation 19 Plan (PLP4), having the benefit of recent planning permissions, delivering in combination up to 1,056 new dwellings, and a new multi-modal transport hub including expanded Park and Ride facility.
- Draft policy PLP3 is now solely focused upon the Tipner West & Horsea Island East. None of the three Regulation 18 options now feature in the Regulation 19 Local Plan. In particular, the concept of a 'super peninsula' involving substantial reclamation from Portsmouth Harbour has been abandoned in response to the significant objections received and following further detailed assessment of alternative options for development of the site, alongside financial viability considerations.
- After a period of extensive optioneering undertaken by the Council's Tipner Regeneration Project team, in consultation with the LPA and the Tipner West Regulatory Panel and following the approval by Full Council (in October 2022) of

new 'guiding principles' for development of the site (updated in March 2024), the site's red line now incorporates all of the existing Tipner West landmass, Horsea Island East, a connecting bridge corridor parallel to the M275, an area of roughly 0.5ha of reclamation to support an operational marine hub alongside deep water access at the site's northern peninsula, plus the M275 junction 1 where highway improvements may be required.

- The new red line boundary is allocated for the development of between 814-1,250 dwellings, a marine employment hub comprising 58,000sqm employment floorspace (use classes E(g), B2 and B8), a bridge, flood defences, shops selling essential goods and a community meeting place. The minimum quantum of 814 homes would comply with the City Deal total quantum of housing delivery (2,370 homes), having regard to 1,056 homes at Tipner East and 500 at Port Solent (draft policies PLP4 and PLP11).
- A range of dwelling numbers is proposed, up to a maximum level of 1,250, to both deliver a sustainable new community alongside a marine hub of regional significance, but in addition to support, through cross-subsidy, the delivery of the totality of the site allocation, recognising the significant enabling infrastructure expenditure required (notably in respect of required sea defences and site decontamination, including associated land raising across the majority of the Tipner West landmass).
- No express requirement is now stated for the following development/land uses (principally via Option 1): a primary school (including nursery accommodation), hotel accommodation, 12,000sqm commercial offices or healthcare uses.
- Provision for retail use is now restricted to no more than 280m^2 for essential goods, including food (Use Class F2a), the previous Option 1 having sought up to 4,500sqm of retail/food and beverage.
- A community meeting place is sought (Use class F2b), in place of 2,500sqm community/healthcare floorspace previously sought under Option 1.
- The policy continues to require the necessary flood prevention infrastructure and site de-contamination works (including removal of unexploded ordnance) as part of any approved proposed development.
- The new policy no longer contains express reference to the potential for different housing typologies and tenures (notably senior living accommodation, self-build/custom-build, co-living, build-to-rent) and simply references residential dwellings (use class C3) as these requirements are set out within draft policies PLP17-PLP19.
- 'Car-free' streets are to be provided 'wherever feasible' whereas the Regulation 18 policy Options had sought 'a substantial majority' of streets to be car-free. This change is proposed to optimise development viability and deliverability.
- The Regulation 19 policy continues to seek a bridge connecting Tipner West with Horsea Island East, in order to secure enhanced sustainable transport options, including the Bus Rapid Transport network and improved pedestrian and cycle routes, notably supporting the delivery of improved connections from Port Solent to Tipner and onwards to the City Centre (and avoiding reliance upon private car usage of the M275).
- The new policy includes reference to the Scheduled D-Day slipways at the shoreline of Horsea Island East. This has been added following the decision of

Historic England to Schedule the slipways, in 2022 and after the last Regulation 18 Consultation took place.

- Express reference to Biodiversity Net Gain (noted as a 15% requirement in the Regulation 18 Plan Options) is removed in favour of the bespoke BNG policy PLP40 in the Regulation 19 Local Plan.
- Both the Regulation 18 Local Plan and the current Regulation 19 Local Plan set out the requirement for any development to identify likely significant effects to the designated habitats and citation species within the adjacent National Site Network and international Ramsar sites, and 'where necessary' to compensate such impacts where these cannot be avoided through alternative solutions. However, the Regulation 19 Local Plan makes more express reference to the need for the developer to pass all three derogation tests as set out in the Habitat Regulations 2017 (as amended) and that, in addition, the loss of existing functionally linked habitat, in particular on the former Tipner firing range, would be adequately mitigated.
- The issue of meeting housing need in Portsmouth is addressed under Policy H1. The Pre-Submission Local Plan does not meet the City's housing need as defined by the Standard Method, because of its constrained island geography. The housing target set in Policy PLP16 of the Reg 19 Local Plan is capacity based. The new homes at Tiner West will contribute to the overall housing requirement of 13,603 new homes.
- The proposed site allocation would facilitate the delivery of a coastal walkway, as sought in some responses, linking with Tipner East and Horsea Island (via the proposed bridge), subject to this being feasible and such walkway(s) avoiding unmitigated recreational disturbance to protected bird populations (Policy PLP3(2)(m).
- With regard to the mixed views on potential development density, some respondents are calling for higher density tower blocks, but others are seeking development more akin to the lower rise scale of Stamshaw to the east, draft Policy PLP3 seeks to deliver a landmark gateway development. The site is also identified for high density development in draft policy PLP21 where density of at least 120dph would be sought unless reasons for not doing so are clearly justified. The draft site allocation recognises that development will need to be sensitive to heritage asset setting including views across Portsmouth harbour and the setting of Portchester Castle in particular. It is considered that the Plan recognises the need to strike a balance between delivering a gateway development to the City, optimising development density in a City of constrained housing land supply whilst protecting natural habitats, heritage assets and established built character and scale. It should also be noted that high density development has been approved for Tipner East up to 11 storeys and is in the process of implementation.
- Responses have noted the potential for tidal energy at the site. This would be supported by draft policy PLP34: Renewable Energy and would be a matter for negotiation as part of any planning application. At the current time, it is understood that this is being actively explored for the site.
- Historic England questioned the evidence base for 800 homes and 25,000sqm employment space at the site. The evidence base is set out with the draft Plan, including the HELAA and HEDNA which demonstrate the importance of the Tipner

West and Horsea Island East allocation in meeting identified needs. Caution raised about the need to protect the setting of key heritage assets has been addressed in the draft Plan, as noted above. A balance needs to be struck between managing the impact of development heights on heritage asset setting, with the need to minimise the spread of built footprint (at lower densities) to protect SPA/Ramsar habitats whilst delivering a viable development and it is considered the draft Plan provides the necessary policies to balance these considerations.

S3 Fratton Park and the Pompey Centre

A2.410 Fratton Park has been the home of Portsmouth Football Club since 1899 and its activities play an important cultural role in the City's identity. The football ground is partly surrounded by an area of warehouse-style retail and trade units (including The Pompey Centre) with residential areas to the east and south.

A2.411 However, the capacity of the grounds and the physical infrastructure for getting fans to and from the site is currently insufficient, causing congestion during peak arrival/departing periods. The site is also bisected by Rodney Road which is one of the main thoroughfares for the City. This road and the adjacent railway line prevent easy pedestrian and cycle movement to and through the site and the area is dominated by a car-based layout. This leaves a bland, unintuitive public realm for pedestrians with no notable green space or features.

A2.412 Policy S3 aims to enhance Fratton Park's role and contribution to Portsmouth's cultural identity, recreational provision and overall economic development, whilst optimising the development potential of the surrounding area to help support the housing needs of the City. Together, the allocation area could deliver approximately 750 homes.

A2.413 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S3.

Question 40a: Do you agree with the proposed approach to Policy S3?	
	No. of respondents: 71
Yes	54
No	11
Not sure/don't know	6
Question 40b: Do you have any further comments or suggestions about the suggested approach proposed approach to Policy S3?	
	No. of respondents: 37

A2.414 As the table above shows, the responses received in relation to Question 41a were mostly supportive with circa 76% of respondents agreeing with the proposed approach to Policy S3. Only circa 16% did not agree with the proposed approach and 8% were not sure.

A2.415 Overall there was a mixed response in relation to Question 40b and the proposals set out in the draft policy. While a number of comments support the proposed development some comments do suggest rather than expanding the stadium at its current location the stadium should be moved elsewhere in the City such as Alexandra Park. The stadium is seen as a significant landmark and vitally important community hub in Portsmouth, with very limited mention of removing the stadium or whether it is needed.

A2.416 Whilst the proposed development as set out in Policy S3 was supported in most instances, respondents felt that there were certain areas that still needed to be addressed. There were some concerns regarding the capacity of the local infrastructure with the proposed increased development, in particular the road infrastructure. There were concerns for how busy the roads got (especially on match day) and the lack of cycle or walking facilities. In addition, a handful of comments also raised the need to provide more green infrastructure opportunities within the policy.

A2.417 Other responses expressed concerns as to why the Council is allowing housing on a site identified as a' strategic employment site' in the Economic Development and Regeneration chapter.

A2.418 **Pompey Supporters' Trust Board:** are supportive of the draft policy and have submitted some suggested amendments/corrections which are outlined below:

- *Para 7.3.1 The south stand was built in 1925 and is not part of the original stadium;*
- *Para 7.3.3 Shouldn't reference to Rodney Road should read Fratton Way?;*
- *Para 7.3.6 Current capacity, subject to H&S work, is c20,000 not 25,000;*
- *Para 7.3.15 Reference to fig 28 should be fig 30 (four instances);*

- *Reference to "land west of the Pompey Centre" should read east of ... or west of Fratton Way?*

S3 Fratton Park and the Pompey Centre - interim Council response
The overarching aim of the Policy is to support proposals that enhance Fratton Park's role and contribution to Portsmouth's cultural identity, recreational provision and overall economic development, whilst optimising the development potential of the surrounding area to help support the housing needs of the City. There appears to be some confusion with regards to the area identified as a strategic employment site in the Economic Development and Regeneration chapter and the site identified in the draft policy. The Fratton Park and the Pompey Centre is not located within the area identified in Figure 5. The Council will take on board comments received and amend or correct the policy where necessary.
Policy Status: **Amber**
Following the comments received, the wording of the policy will be amended to reflect some of the concerns that were raised. Further options for improving infrastructure in and around this area will also be considered when reviewing the policy.

Policy S3 Fratton Park and the Pompey Centre - Regulation 19 2024 Council response
How the representations have been taken into account in the Pre-Submission Local Plan 2024: • Following comments from the Pompey Supporters' Trust Coard, factual evidence has been amended. • The Regulation 19 Policy seeks to integrate more greening into the strategic site, which is currently predominantly hard landscaping. • The Regulation 19 Policy retains the requirement for an off road route between Fratton Station and the Strategic Site to allow for safety of pedestrians and cyclists. Within the Regulation 19 policy, there is a further requirement to make use of active frontages along here.

S4 Cosham

A2.419 The Cosham Strategic Allocation is an identified area of development potential which broadly comprises the Cosham District Centre area and opportunity sites to the north along Southampton Road and London Road, and is considered to be able to deliver around 740 dwellings and 5,000 sqm of employment floorspace.

A2.420 National Planning Policy states that planning policies should promote the effective use of land in meeting the need for homes and other uses and support the development of under-utilised land and buildings, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategies for addressing growth needs should make as much use as possible of previously developed or 'brownfield' land.

A2.421 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S4.

Question 41a: Do you agree with the proposed approach to Policy S4?	
	No. of respondents: 64
Yes	27
No	34
Not sure/don't know	3
Question 41b: Do you have any further comments or suggestions about the suggested approach proposed approach to Policy S4?	
	No. of respondents: 45

A2.422 There were a total of 64 responses to question 41a of which the majority (circa 53%) did not agree with the proposed approach to Policy S4. Circa 42% agreed with the approach and only circa 5% were not sure.

A2.423 The responses to Q41b included: concerns relating to inadequate infrastructure to support proposed housing numbers, such as GPs, schools, sewers/drainage; Cosham needs height, more public schools, improved F&B, more support for long-term tenants, pedestrianised high street; concerns over parking provision and existing capacity, and traffic congestion; proposed density seems very high, concern this will only be achievable through higher buildings that would ruin Cosham's character; support for improvements to Spur Road/Northern Road; concerns over flood risk, especially from surface water; need for better quality shopping in Cosham; Bus Rapid Transit scheme needs to be better; concern over additional retail space provision; suggestion of adding trees wherever possible; should consider EV charge points in residential roads with only on-street parking and support for 'transport hub' - perhaps use the former IBM site.

A2.424 **Southern Water:**

- Southern Water has undertaken an assessment of existing infrastructure capacity and its ability to meet the forecast demand for each of the development sites set out in the draft Portsmouth Local Plan 2038. That assessment reveals that reinforcement of the local sewerage network would be required to accommodate 740 dwellings at Cosham.

- This is not a constraint to development, provided Southern Water can work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development.
- Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of the necessary infrastructure.
- Unless planning policies support delivery of the network reinforcements required to accommodate new development, there is a risk that it will not be delivered in tandem with development, leading to an unacceptable risk of foul water flooding to both new and existing residents. This situation would be contrary to paragraph 174(e) of the NPPF (2021), which requires the planning system to prevent both new and existing development from contributing to pollution.
- Therefore, whilst a lack of capacity is not a fundamental constraint to development, planning policies should ensure that new or improved infrastructure will be provided in parallel with the development.
- We therefore, request the following provision be added to site specific requirements for Policy S4: Cosham: *Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider.*

A2.425 **Portsmouth Labour Group:** indicated agreement with the policy.

A2.426 **NHS Property Services:**

- It is noted that Site Allocation S4 covers an area which includes Cosham Health Centre. NHSPS own the freehold to Cosham Health Centre.
- Cosham Health Centre currently consists of an operational health centre, comprising of a part two, part three storey building with one level of under croft parking. Whilst the health centre is currently part operational, it is likely that the site will become surplus to NHS requirements as existing services are dispersed to nearby facilities which more adequality meet the needs of patients. After the property becomes vacant, NHSPS will seek to dispose of the health centre for best value.
- Importantly, the decision on whether a property is surplus to NHS requirements is made by the health commissioners and clinicians who use the property.
- Once declared surplus, NHSPS will explore alternative uses for the site, likely a residential redevelopment. The capital receipts and savings generated from the disposal of the property will enable investment in modern services and means of care for the NHS. It is therefore, encouraging to see that the Council recognise that Cosham Health Centre could be better optimised, offering an opportunity to deliver significant regeneration in partnership with relevant public bodies.
- NHSPS support the Council's intention to deliver high-quality mixed-use development, comprised of high-density housing within the site allocation. NHSPS also support the opportunity to redevelop existing buildings and land plots to make the most efficient use of land.
- To deliver this, the Council will take a 'proactive role in identifying and helping to deliver land that may be suitable for meeting development needs.' To implement this, 'the Council will seek to work in partnership and/or joint venture with other

public bodies, and/or if necessary private landowners, to enable the effective delivery and funding opportunities to deliver comprehensive regeneration schemes.'

- Whilst NHSPS supports the overall approach to the site allocation, it is imperative that the Council support NHSPS in seeking to explore alternative value generating uses for Cosham Health Centre and ultimately achieve best value for patient services in the area.

A2.427 **Public Health England:**

- All being well, the correct use of preceding policies should mean that all strategic development considers health and wellbeing issues as a matter of course.
- Public Health are already engaged in ongoing work on several strategic sites and have previously made representations to consultations for Cosham, St James' and Tipner, but highlight the key messages:
    - Air quality, reducing vehicle dominance and car use must be a priority for all strategic sites, but particularly those already in higher density areas of the City.
    - There is a clear expectation that Strategic Development site proposals pay close attention to, and clear adherence with, the Health Pollution and Amenity Policy.
    - Note that the strategic site policies all refer to active and sustainable travel infrastructure, but question where the overarching policy provision is to ensure that they are all connected and that wider infrastructure improvements are made beyond site boundaries to enable a high quality, functioning network.
    - All strategic sites need to ensure they are providing opportunities for, and not adversely impacting upon, existing communities - this can be addressed through Health Impact Assessment.
    - For all strategic sites, Public Health fully supports proposals for off-road active routes (particularly emphasised in Policy S3: Fratton Park and the Pompey Centre). Further policy provisions for clear segregation between cycles/scooters and pedestrians are encouraged wherever possible, as well as the role of greening to be recognised as a way in which to improve the amenity value of these areas (to encourage walking and cycling).

S4 Cosham - interim Council response
The responses from the consultation have not shown there is majority support for the policy. The main concerns appear to be whether there is adequate provision of physical and social infrastructure to support the level of proposed development allocated to Cosham. Notwithstanding, the NPPF requires that planning policies should reflect changes in the demand for land, be informed by regular reviews of both the land allocated for development and of land availability, and consider whether there is reasonable prospect of the use allocated in the plan coming forward at the point envisaged.
Policy Status: **Amber**
There is further work required to substantiate the policy in terms of the deliverability and availability of the allocated sites identified in the draft policy. This includes a review of land availability and demand, consideration of any planning applications granted permission or coming forward, and consideration of the phasing of land, uses, and development quantum over the identified plan period. There is also further need to identify and assess any infrastructure needs required to support the proposed level of development allocated to Cosham.

Policy S4 Cosham - Regulation 19 2024 Council response
How the representations have been taken into account in the Pre-Submission Local Plan 2024: • Policy S4 Cosham has not been taken forward in the Regulation 19 Local Plan. An analysis of land availability at present, including the Call for Sites and landowner consultations, does not positively indicate that there are deliverable sites within Cosham that can be allocated as a Strategic Site in the Local Plan. • New development could still come forward as market forces dictate and proposals would still be assessed against the provisions of the Local Plan and national policy.

S5 St James' and Langstone Campus

A2.428 The St James' and Langstone Strategic site is located in Milton, an area on the eastern edge of Portsea Island with a predominantly suburban character. The site consists of two main development areas, the first is the listed St James' Hospital and its grounds, including the NHS Solent medical campus and the southern part of the site under the control of the HCA including the former Harbour School. The second main area is the former Portsmouth University Langstone Campus including university student halls of residence with adjoining playing fields. The St James' and Langstone Campus site falls within the Milton Neighbourhood Plan area. Further

detailed policy guidance for the site can be found in the emerging Neighbourhood Plan.

A2.429 The site is currently in multiple ownerships. This policy presents an opportunity to provide a strategic overview of how the site could develop including consideration of site specific constraints and opportunities. The St James Hospital site was previously identified in the Portsmouth City Local Plan (2001) under policies MT 2 – 4.

A2.430 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S5.

Question 42a: Do you agree with the proposed approach to Policy S4?	
	No. of respondents: 58
Yes	35
No	14
Not sure/don't know	9
Question 42b: Do you have any further comments or suggestions about the suggested approach proposed approach to Policy S4?	
	No. of respondents: 44

A2.431 Of the 58 responses to question 42a, the majority (circa 60%) agreed with the approach that had been taken to Policy S4. Circa 24% of respondents disagreed with the approach and circa 16% were not sure or did not know.

A2.432 There were a mix of comments received in relation to question 42b. Some common responses included the feeling that there was too much development proposed at the site at a proposed density that was too high. Any development would need to be sensitive to the surrounding heritage assets, still allow public access and provide sufficient levels of supporting infrastructure. Other comments including from Homes England supported the allocation of 436 dwellings, but recommended a number of amendments to the policy.

A2.433 **University of Portsmouth:** support the approach to Policy S5, stating the campus site has capacity to accommodate 310-410 homes on the previously-developed section.

A2.434 **Solent NHS Trust:** object to the allocation of greenspace around the hospital due to the restrictions this places on development of the land. It is not 'public open space' as alluded to and therefore, it is essential to retain this land as an opportunity for future healthcare development.

A2.435 **PJ Livesey and NHS Property Services:** the policy wording should not identify the specific areas of open space to be retained with the exception of the cricket club.

A2.436 **Milton Neighbourhood Forum** feel that the principle of a 'Green City' will be compromised by both St James' and Langstone Campus as strategic development area due to already existing congestion hotspots. The comments proposed excluding Langstone Campus as a strategic site.

A4.437 Of the comments received in relation to Q42b, a common issue highlighted the importance of the green space, in particular the protection and retention of the trees, and open spaces for biodiversity.

A4.438 The **RSPB** and **Hampshire & Isle of Wight Wildlife Trust:** were concerned about the proposed housing allocation without any mitigation or off-setting, questioning the soundness of the policy.

A4.439 **Natural England:** raised concerns for the direct and/or indirect effect on the SPA supporting habitat. Concerns were raised regarding the overall levels of development and the impact this could have on vehicular access and potential congestion on an already pressured road network.

A4.440 **Historic England:** felt the policy was unsound due to limited relevant and up to date evidence.

A4.441 There was overall support for the ongoing medical uses as part of the site mix, however, some responses questioned the site's suitability for elderly person's accommodation.

A4.442 The Milton Neighbourhood Plan was raised on a number of occasions with both support and concern to it being referenced.

S4 St James' and Langstone Campus - interim Council response

There were a mix of responses in relation to Policy S5. There was some level of support for the proposal, however others raised concerns over the density of the proposed development and the amount of development that was being proposed.
Other common areas of concern included the loss of biodiversity, trees and open space and the increased levels of traffic and connection that this could cause on an already pressurised road network. The Council needs to ensure that the policy position on protection of open space is clarified, and further emphasis put on the value of spaces on the sites.

Policy Status: **Amber**

The Policy will require amendments to emphasise the need to protect biodiversity and green infrastructure. The Council will monitor the position held by Milton Neighbourhood Forum on the open space allocation at St James' following meetings with the NHS Property Services and ensure the new Local Plan complies with the decision reached.

Policy S4 St James and Langstone Campus - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- The housing figure has changed from the Regulation 18 Local Plan. It has been reduced from 436 to 417. This is primarily due to the reduction of homes within the Homes England parcel. Following comments from Homes England, the term 'approximately' has been included to reflect the understanding that at the application stage, exact quanta may slightly differ to the allocation.
- The quantum of development at Langstone Campus has been informed by ongoing discussions with the University of Portsmouth. Further to this, the University's comments in relation to the Milton Neighbourhood Plan have been taken on board and the Local Plan policy takes a less constrained approach to the delivery of development on the site.
- In response to comments from Solent NHS Trust, the land around the Orchards will be retained for any future healthcare related development.
- Following comments from the RSPB and Natural England, the policy requirements for the whole site to provide further detail on the protection of the SPA and supporting habitats and the mitigation and offsetting required.
- The policy continues to place emphasis on the protection of key areas of open space and important trees within the site. The St James' criterion in the Regulation 19 Policy states the need for a heritage statement and Arboricultural Impact Assessment/ Method Statement following comments on the importance of these aspects.
- The Policy also references specific highways infrastructure that will need to be delivered.
- The Policy itself has removed reference to development needing to 'take account of the Milton Neighbourhood Plan'. Instead, paragraph 4.155 of the Reg 19 Local Plan states that "further detailed policy guidance for the site can be found in the adopted Milton Neighbourhood Plan."
- With regards to Langstone Campus, the Reg 19 policy requires a Landscape and Visual Impact Assessment, which is an addition from the Reg 18 Policy.

S6 Lakeside Business Park

A2.443 Lakeside North Harbour is a part-developed, high quality office campus set within 135-acres of landscaped grounds, originally developed by IBM for their UK

Headquarters. Today, it is Portsmouth's premier business location and a key employment site within the sub-region, hosting businesses from a range of sectors including finance, legal, IT, research and development, marketing and public bodies and online retailers.

A2.444 As one of the City's most significant employment sites, the retention and provision of employment land at Lakeside is vital to ensuring the City can meet its employment floorspace requirements for the plan period, and to continue to provide high quality office space for the wider sub-region.

A2.445 Policy S6 sets out the uses and criteria for new development proposals at Lakeside. Proposals for alternative development would also need to meet the tests of Policy E2: Employment Land.

A2.446 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S6.

Question 43a: Do you agree with the proposed approach in Policy S6?	
	No. of respondents: 45
Yes	26
No	19
Question 43b: Do you have any further comments or suggestions about the suggested approach in Policy S6?	
	No. of respondents: 36

A2.447 The comments received in relation to Question 43b were largely supportive of the employment-led approach to provide at least 50,000sqm of office uses (Class E(g)(i-iii) uses). However, several responses were not supportive of the residential element of the Policy S6 with many having concerns on the impact of so many dwellings on the local infrastructure, the knock on effect to biodiversity, the environment and green space, and the lack of public transport to the site.

A2.448 The **Woodland Trust** has identified a notable tree (Ancient Tree Inventory ID 58610) within this area and have asked that this tree and its root protection area should be safeguarded in any proposals for this site.

A2.449 **Natural England** advise that the requirement for consideration of impacts of developing this site on the network of SPA supporting habitat is assessed at the earliest possible stage, to inform the sustainable development of this site, including the requirement for mitigation.

A2.450 An assessment undertaken by **Southern Water** revealed that reinforcement of the local sewerage network would be required to accommodate 500 dwellings at Lakeside & North Harbour. This however, is not considered a constraint to development, provided Southern Water can work with the site promotors to understand the development programme.

S6 - Lakeside Business Park - interim Council Response

The overarching aim of Policy S6 is to set out the uses and criteria for new development proposals at Lakeside. The Council will take on board comments received, especially in relation to the environmental impact on developing the site and how traffic could be reduced.

Policy Status: **Green**

Overall, this policy is considered to be suitable, with only potentially minor amendments.

Policy S6 Lakeside Business Park - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- Draft Policy PLP5: Lakeside North Harbour allocates land for 50,000m^2 of office (Class E(g)(i)) uses. Other commercial uses that complement the existing office park are permitted if robust evidence following a marketing campaign of at least twelve months demonstrates that there is insufficient market demand for new offices at Lakeside.
- Lakeside is not allocated for any new homes in the Reg 19 Local Plan.
- Draft Policy PLP5 requires an Arboricultural Impact Assessment, Arboricultural Method Statement and associated Tree Protection Plan to be submitted and implemented to protect trees throughout the site.
- The draft Policy PLP5 states developers should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked (Candidate Site P138) to Solent's SPAs / Ramsar sites.

Area Allocations

S7 PCC Estate Renewal

A2.451 Within the City there are a number of housing estates which are predominantly in Portsmouth City Council's ownership. Due to these estates being largely developed in the post war period, the Local Plan looks at where growth and/or renewal opportunities could arise during the plan period.

A2.452 National planning policy encourages the utilisation of existing development areas where possible and the creation of mixed, sustainable communities that promote the health and wellbeing of residents.

A2.453 Portsmouth City Council were awarded funding to test the Government's National Model Design Code (NMDC) in March 2021. Working with the Department for Levelling Up, Housing and Communities (DLUHC) (formerly known as the Ministry of Housing and Local Government (MHCLG)), Portsmouth City Council is seeking to develop a design coding process for estate renewal within the City, using Horatia and Leamington site redevelopment in Somerstown as a case study for the pilot.

A2.454 The Local Plan 2038 Regulation 18 consultation asked a number of specific questions relating to PCC Estate Renewal areas and the development and testing of a potential Estate Renewal Design Code.

Question 44a: Do you agree with the proposed approach in Policy S7?	
	No. of respondents: 22
Yes	20
No	1
Not sure/don't know	1
Question 44b: Do you have any further comments or suggestions about the suggested approach in Policy S7?	
	No. of respondents: 10

A2.455 The comments received in relation to Question 44b were largely positive and included: support to continue to keep the housing estates in Council ownership, ensuring that housing is built to the highest standard with access to green space and that the views of the existing PCC estate residents are considered, with the suggestion of an estate ballot where plans involve the redevelopment of existing homes.

A2.456 **Natural England:** commented with reference to the area of Paulsgrove, one of the areas included within this policy, which lies directly adjacent to Portsdown SSSI, which is designated for chalk grassland and invertebrate assemblages. Natural England suggested development proposals in this area should include an assessment of any potential impacts to the SSSI, and where required, be accompanied by appropriate mitigation measures.

Question 44c: What elements of the existing estate areas are important and should be retained?	
	No. of respondents: 9

A2.457 The comments that were received under Question 44c included: open space; gardens; community hubs and centres and the character of older buildings, if safe to do so.

Question 44d: What elements should be renewed for the future?	
	No. of respondents: 12

A2.458 The comments that were received under Question 44d included: dated tower blocks; badly connected developments; the insulation of homes; the quality of build; green spaces and encouraging areas for residents to grow their own; community facilities such as doctors surgeries and shops, ensuring that older housing stock is renewed to ensure those living their can do so safely and healthily and reducing the height of buildings when redeveloping, where possible.

S7 - Estate Renewal - interim Council Response

The very low number of responses to this policy are noted. The majority of respondents agreed with the Council's approach to this policy. The responses to the regulation 18 consultation highlight the importance of housing estates within the Council's ownership, ensuring high quality builds and green and open spaces for residents to access. Natural England suggested development proposals within the Paulsgrove estate should include an assessment of any potential impacts to the SSSI, and where required, be accompanied by appropriate mitigation measures. The Council will investigate this further in preparation for the regulation 19 Local Plan.

Policy Status: **Green**

The Council welcome the responses and suggestions received and will carry out further investigations of the points raised and will refine the policy accordingly. This will also need to be clearly shown through the Regulation 19 Local Plan and supporting documents.

Policy S7 Estate Renewal - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- Many of the comments made relate to the standard and quality of accommodation, built and green space. The policy refers explicitly to provision of new homes 'through comprehensive redevelopment or the maintenance and/or improvements to existing housing stock' (PLP23.1.a.). An additional criterion has been added to

Policy PLP23 Estate Renewal of the Regulation 19 Local Plan that requires deliver high quality design and sustainability.

- A criterion on open space and green space has been carried forward from Policy S7 of the Regulation 18 Local Plan to the Regulation 19 Local Plan's Policy PLP23. e. which seeks to 'Create welcoming, accessible high quality open spaces and play areas and improvements to existing open spaces and amenity areas.'
- A number of other policies in the Regulation 19 Local Plan cover comments made on Policy S7 at the Regulation 18 consultation, for example, assessment of potential impacts to the SSSI and appropriate mitigation is covered by PLP39: Biodiversity and PLP43: Recreational Disturbance on International Nature Designations. The Council's development approach to community facilities is detailed in PLP52: New and Existing Community and Leisure Facilities, and shops at PLP29: Small Local Shops. There is no need to repeat relevant policies within PLP23.

S8 The Seafront

A2.459 Portsmouth's seafront area – stretching from Old Portsmouth to Eastney – is one of the City's most important and valued assets. It plays a key role in shaping perceptions of Portsmouth, both as a visitor destination and as a home for residents. People come to the seafront to enjoy views of the Solent, experience the seafront environment, and take part in leisure, cultural, and recreational activities all year round.

A2.460 In order to maximise the potential of the seafront as a whole and to create a vibrant area, there is a need to promote regeneration opportunities and enhance the seafront's leisure, culture, and entertainment offer to strengthen the seafront as a year-round destination for the benefit of local residents and visitors to the City. New sea defences are also planned, which will not only provide sufficient protection from future sea flooding events but will also provide opportunities to regenerate the seafront, and to review connectivity, movement, and accessibility around the seafront area and between the seafront and other parts of the City.

A2.461 Policy S8 sets out the broad approach to development in the seafront area. The Council adopted the Seafront Masterplan Supplementary Planning Document (SPD) in 2021, which describes development opportunities in further detail.

A2.462 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S8.

Question 45a: Do you agree with the proposed approach in Policy S8?	
	No. of respondents: 52
Yes	38
No	7
Not sure/don't know	6
Question 45b: Do you have any further comments or suggestions about the suggested approach in Policy S8?	
	No. of respondents: 34

A2.463 The responses to Q45b included: the lack of connectivity between the seafront from northern part of City; introducing free parking for residents; incentivise visitors to use train or Park & Ride; the importance of protecting the open and uncluttered character, and limiting development along seafront; the need for the sea defences; how it is critical to preserve the unique natural habitats; inclusion of more indoor visitor attractions; the need for more beach huts; highlighting the dominance of vehicle traffic which needs to be brought under control - reallocate road to restrict on-street parking in favour of sustainable/active travel and the suggestions of including the Clarence Pier site and area near Hovercraft - which has development potential; tree and wildflower-planting on some areas of Common; extend open top bus route to Gunwharf; idea for 'Pompey Pass' to cover discounted entry into attractions/buses and the idea for seafront to host 'Formula E' races. There was also the mention of pollution of sea by water companies.

A2.464 RSPB and **Hampshire & Isle of Wight Wildlife Trust:**

- The proposed approach to The Seafront needs to be undertaken with care. The supporting evidence, including the Masterplan and the HRA of the Seafront Masterplan, highlight the sensitive wildlife sites scattered throughout this area. This includes Core Areas supporting Brent Geese and forming a network of SPA functionally linked land as well as the impact to Portsmouth and Chichester and Langstone Harbours SPAs. However, we do not agree with the conclusions of the HRA of the Seafront Masterplan due to a lack of supporting evidence, particularly in the case of recreational pressure and loss of functionally linked land, which we feel should be further assessed. Therefore, we recommend that the Draft Local Plan HRA screens in the additional impacts pathways of recreational pressure and loss of functionally linked land in respect of Policy S8, as we do not consider these effects can be ruled out at this stage.
- It is important to recognise the ecological sensitivities of these sites and how the objectives of Policy S8 can be achieved whilst not having a negative impact on important sites. We would support the inclusion of the additional text recommended by the Draft Local Plan Appropriate Assessment (para 6.38) in respect of Policy S8, and consider this would improve the soundness of the Seafront policy.

A2.465 **Historic England:** we have no specific comments regarding this policy. We commented on the now adopted Seafront Masterplan and we are content that our comments were sufficiently responded to in the Seafront Masterplan.

A2.466 **The Woodland Trust:** we welcome the policy that development proposals must take into account of the proposed 'green corridor' for the seafront. We note the presence of a veteran tree (Ancient Tree Inventory ID 156232) and a notable tree (Ancient Tree Inventory ID 25700) within this area. We ask that these trees and their root protection areas should be safeguarded in any proposals for this site.

A2.467 **Portsmouth Labour Group:** indicated support for this policy.

A2.468 **Premier Marinas Ltd (via agent):** indicated support for this policy.

A2.469 **Natural England:**

- We welcome the clear requirements for the protection and enhancement of the natural environment included in this policy, including reference to the Seafront Masterplan SPD (March 2021) which provides some additional detail on construction and disturbance impacts.
- Thorough consideration of the impacts of development on designated sites and supporting networks including SPA supporting habitat will be required, together with the need for mitigation and/or compensation. However, Natural England recommends construction work (including any noisy activities in excess of 69 dB LAF,max) should avoid the bird overwintering period which we advise covers October to March inclusive.
- The identified Seafront Area includes numerous parcels identified as supporting habitat for the Solent SPAs. To support existing approaches outlined in the Masterplan, and to inform any development coming forward in this area outside of the Masterplan, we advise Policy S8 includes a clear reference to the potential for development in this area to impact SPA supporting habitat. Similarly, any impacts to adjacent Habitats Sites should also be robustly assessed, and appropriate mitigation or compensation strategies developed. Project-level HRA may be required.

S8 The Seafront - interim Council response

Responses from the consultation indicate support for this policy. Concerns that have been raised overlap with and are addressed by themes from other policy areas, such as Transport, Biodiversity, and Green Infrastructure, which any development proposal should have due regard to as well as the policies of this plan as a whole.

Additionally, the Council adopted the Seafront Masterplan Supplementary Planning Document (SPD) in 2021, which described development opportunities in detail. The Seafront Masterplan SPD is a material consideration for decision-making, and sets out the planning delivery strategy for guiding, shaping, and enabling future development, regeneration, and public enhancement opportunities in the Seafront area. Notwithstanding this, the Seafront Masterplan SPD will be subject to review as necessary and as opportunities for future enhancements arise.

Policy Status: **Green**

The Council welcome the responses and suggestions received through the Regulation 18 consultation and will only make minor changes to this policy if necessary.

Policy S8 The Seafront - Regulation 19 Council response

How the representations have been taken into account in the Pre-Submission Local Plan:

- The specific Seafront policy has been removed from the Regulation 19 Local Plan. This is due to it not being felt necessary to include as the development that was proposed under Policy S8 is now covered by general policies in the Reg 19 Local Plan and the Seafront Masterplan SPD.

S9 Portsdown Hill

A2.470 Portsdown Hill is one of the largest areas of open space in Portsmouth and forms the northern boundary of the City which adjoins the Winchester, Fareham and Havant authority areas. Over fifty hectares of the south face of the hill is a designated SSSI owing to its chalk grassland habitat. There are a number of features used by visitors and Portsdown Hill has significant history associated with the defence of the Naval Dockyard and is home to three historic fortresses, of which Fort Widley and Fort Purbrook fall within the City's boundary.

A2.471 National Planning Policy states that access to a network of high quality open spaces, and opportunity for sport and physical activity, are vital for health and wellbeing. Policy S9 of the New Local Plan encourages the delivery of proposals on Portsdown Hill that increase and enhance public access to land, biodiversity or active travel, whilst protecting and enhancing the key characteristics including its landscape, ecological and heritage value.

A2.472 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S9.

Question 46a: Do you agree with the proposed approach to Policy S9?	
	No. of respondents: 44
Yes	40
No	4
Not sure/don't know	2
Question 45b: Do you have any further comments or suggestions about the suggested approach in Policy S9?	
	No. of respondents: 15

A2.473 Responses to Q45b included: support to improve public access to Portsdown Hill, as well as ways to better improve current access, in particular due to the unsafe nature of Portsdown Hill Road. It was believed that there should be better signposting, safer ways to cross the road with necessary safe cycling infrastructure implemented to better allow for both vehicles and cyclists. Further comments commended the efforts to make Portsdown Hill a visitor destination, with further encouragement for more leisure uses.

A2.474 **Fareham Borough Council:** supported the approach to Portsdown Hill which supports that contained within the submitted Fareham Local Plan.

A2.475 **Winchester City Council:** comments promoted conservation and protection of Portsdown Hill for its recreation, landscape, heritage and biodiversity importance, the explanatory text supported the use of Brownfield Land for employment development which is not suitable for its remote nature. Winchester Council suggested *"the policy provides only for recreation-related development and defines in due course the extent of brownfield land on the policies map".*

S9 Portsdown Hill - interim Council response

The overarching aim of Policy is to support proposals on Portsdown Hill that increase and enhance public access, including the expansion of existing open access and creation of footpaths, whilst protecting the important features and characteristics of the area.

Further emphasis will be made within the policy for enhanced and improved safety for visitors, cyclists, pedestrians and road users. Enhancements to recreation, biodiversity or active travel should consider the safety of users and where possible reduce existing risks.

The Council will take into account the comment raised by Winchester City Council and review the use of brownfield land for employment use.

Policy Status: **Green**

Overall, Policy S9 is considered to be suitable with very few amendments required.

Policy S9 Portsdown Hill - Regulation 19 2024 Council response

How the representations have been taken into account in the Pre-Submission Local Plan 2024:

- Policy S9 is now covered under the Reg 19 Policy PLP46: Local Green Spaces, as Portsdown Hill is proposed to be a designated Local Green Space (LGS), which is afforded the same level of protection as Green Belt. This is in response to the assessment of potential Local Green Spaces, whereby Portsdown Hill was deemed 'demonstrably special' for its beauty, heritage, recreational value, biodiversity and tranquil nature, as highlighted in the representations above. Further details can be found in the LGS Background Paper.
- As a result, the type of development that will be supported under Policy PLP46 differs from S9. However, development proposals which will enhance the provision of facilities for amenity, sport and recreation uses will be supported, as noted in the supporting text of Policy PLP46 in the Reg 19 Local Plan.
- The representations regarding improved public access, travel, pedestrian safety are now covered in principle under the following policies in the Reg 19 Local Plan: PLP1: Design, PLP47: Movement and Transport and PLP49: Public Realm.
- As Portsdown Hill is now proposed to be a LGS, the representation in regards to the use of brownfield land for employment use is no longer applicable to the corresponding Reg 19 Policy.

S10 Coastal Zone

A2.476 Portsmouth has a significant length of coastline within its boundaries which brings a range of benefits for the City, including health and wellbeing, tourism and recreation, heritage and marine and maritime related industries. The coastline environment will need management to address predicted sea level rise.

A2.477 National Planning Policy states that Local Plans must set out the priorities for development and use of land within its area, including strategic policies for relating enhancement of the local environment and coastal change management. Therefore, Policy S10 allows for and recognises the expected coastal management changes over the plan period and sets out requirements for any development proposals within the Coastal Zone.

A2.478 The Local Plan 2038 Regulation 18 consultation sought views through a number of questions on the Council's approach to Policy S10.

Question 46a: Do you agree with the proposed approach to Policy S10?	
	No. of respondents: 39
Yes	36
No	2
Not sure/don't know	1
Question 46b: Do you have any further comments or suggestions about the suggested approach in Policy S9?	
	No. of respondents: 15

A2.479 One of the main themes of the comments in response to Q46b is the proposed boundary of the Coastal Zone policy area, with many questioning why the boundary is smaller from the policy in the 2006 Local Plan and no longer includes the boundary of the sports-fields abutting the St James' Hospital eastern boundary. With this in mind, respondents asked that the policy boundary be reinstated to replicate the 2006 policy boundary.

A2.480 **Natural England:** suggest consideration is also given to the North Solent Shoreline Management Plan refresh and its associated sub-categories and the Southern Region Habitat Creation Programme. They also suggest that the following bullet point in the summary table: *"Avoid adverse impacts upon marine and maritime related uses, infrastructure and activities; and" would benefit from the inclusion of the term coastal fringe. As an example: "avoid adverse impacts upon the coastal fringe, marine and maritime related uses, infrastructure and activities; and."*

Policy S10 Coastal Zone - interim Council response
The Policy allows for and recognises the expected coastal management changes over the plan period and sets out requirements for any development proposals within the Coastal Zone. The Council will take on board the concerns raised in regard to propose boundary of the policy in particular with regards to including the boundary of the sports-fields abutting the St James' Hospital eastern boundary and amend the policy to reflect comments submitted by Natural England.
Policy Status: **Green**
Following the comments received and Portsmouth Council's response, there are only some minor changes required to be made to Policy S10.

Policy S10 Coastal Zone - Regulation 19 2024 Council response
How the representations have been taken into account in the Pre-Submission Local Plan 2024: • The boundary of the Coastal Zone was carefully reviewed and the following methodology followed - Areas for inclusion: marine employment, open space and allotments next to coast; Areas for exclusion: not on the coast, housing estates and strategic sites. • Policy PLP36 now makes specific reference to the Shoreline Management Plan and South Inshore and South Offshore Marine Plans and seeks to avoid adverse impacts on the functionality of marine and maritime related uses.

Other Comments

A2.481 To ensure the Draft New Local Plan Consultation was accessible and reached as many people as Portsmouth as possible, the Council used an online virtual room website, which included a feedback form. This feedback form asked 'Do you have any other comments on the Draft Local Plan proposals?' and the responses are analysed below.

Question 47: Do you have any other comments on the Draft Local Plan proposals?	
	No. of respondents: 28

A2.482 The majority of comments received in relation to Question 47 were positive and included: ensuring Portsmouth retain a bold vision for the future; noting how well the City's sea defences are progressing; the need for infrastructure (including schools and doctors surgeries) must be address through this plan alongside the proposed development; all Portsmouth Football Club ground and stadium enhancements are welcomed; the policies need to be linked to the four main aims; and respondents would like to see housing for key workers reference in future versions of the Local Plan.

Appendix 3: Summary of main issues raised on the Portsmouth Pre-Submission Local Plan 2024 pursuant to Regulation 20 and the Council's response

Overarching / general representations on the whole Local Plan

	Number of respondents
Total number of respondents	38
Respondents who raised soundness	8
Respondents who raised legal compliance	6
Respondents who raised Duty to Cooperate	6

A3.1 Most responses are positive towards the Local Plan and respondents are appreciative of being given the chance to submit their views. Some, however, feel that the Local Plan document is lengthy and complex, thereby making it an unsuitable method of consultation with the general public. Where respondents make specific points, they mainly refer to environmental or greening policies. These respondents would like more focus on creating green spaces which maximise their benefits in terms of climate resilience and biodiversity.

A3.2 The following main issues were raised by specific consultation bodies[1] as an overarching / general comment on the whole Local Plan:

- The **NHS Hampshire and Isle of Wight Integrated Care Board (NHS Hampshire and Isle of Wight ICB)** point out that all the GP practices in Portsmouth are already operating beyond their patient capacities, and therefore there is insufficient primary care infrastructure to accommodate the proposed developments.
- **Network Rail** support the direction of the Local Plan in encouraging public transport improvements and promoting sustainable travel.
- **Portsmouth City Council as the Local Highways Authority (PCC LHA)** set out the necessary criteria for addressing transport issues in a Local Plan and stressed the importance of partnership working.
- **Historic England** welcome the heritage content of the Local Plan, but found it unsound. They are happy to work on a statement of common ground with the City Council.
- The adjoining local authorities of **Winchester City Council**, **Fareham Borough Council** and **Gosport Borough Council** made comments on the Local Plan and wanted to continue working closely with the City Council.
- **National Highways** are interested in proposals that have the potential to impact the safe and efficient operation of the M27 and A27 and would be concerned if any material increase in traffic were to occur on either of these due to planned growth within Portsmouth without careful consideration of mitigation measures. They welcome the Council's vision and focus on reducing carbon emissions whilst promoting active travel and public transport.

[1] As referred to in the Town and Country Planning (Local Plan) (England) Regulations 2012

A3.3 The following main issues were raised by general consultation bodies[2] and others as an overarching / general comment on the whole Local Plan:

- **New Forest District Council** made comments on the Local Plan and wanted to continue working closely with the City Council.
- **East Hampshire District Council (EHDC)** commented that the strategy is sound, legally compliant and complies with Duty to Cooperate as there are no areas of disagreement that would lead them to say otherwise. They note that a statement of common ground has been signed between both EHDC and PCC. If there are any further modifications to the Local Plan, they would ask to be consulted.
- **Milton Neighbourhood Forum** reference its representation on the Regulation 18 Local Plan and considered that the Regulation 19 Local Plan would lead to social and economic disbenefits from over development particularly in Milton.
- **Friends of Old Portsmouth Association (FOOPA)** consider the Plan focuses on quantity rather than quality and states that there is too much student accommodation and Houses of Multiple Occupancy.
- **Hampshire & Isle of Wight Wildlife Trust (HIWWT)** consider that the Plan fails to put nature recovery to the forefront and does not meet national targets for nature.
- The **Home Builders Federation (HBF)** consider the end date of the plan period (2040) to be incorrect. If the Plan is not adopted until 2026 that will mean that the plan period is less than the 15 years required by paragraph 22 of the NPPF. They do not consider the plan to be sound.
- **PCC Public Health** consider that Health Impact Assessments should be required by policies other than air quality otherwise wider determinant of health factors in the built environment may be neglected.
- **PCC Public Health** think that the Local Plan should: reference the Building for a Healthy Life and Healthy Streets guidance; have a policy on pubs and takeaways; the climate change policies should talk more about resilience; the Greening the City policies should talk more about multi functionality and the open space policy is not deliverable. They would like the tree policy strengthened with more specific tree replacement and canopy cover targets.
- **PCC Public Health** would like a reference added to the Health and Wellbeing background paper (2021).
- **The Portsmouth Society** commented that heritage, conservation, good design and sustainability are not sufficiently prioritised in the Plan.
- **The Portsmouth Society** commented that the Council should have made better use of digital communication in the consultation.
- The **University of Portsmouth (UoP)** considers the Plan to be overall legally compliant, sound and in compliance with the Duty to Co-operate and makes a number of suggested amendments to Policies PLP6: Portsmouth City Centre, PLP19: Housing for Specific Groups in relation to PBSA, PLP38: Green Infrastructure and PLP41: Trees & Hedgerows.
- **Portsmouth International Port** consider the Plan to be excellent.
- **Premier Marinas** (site promoter for Port Solent, represented by CBRE) support the allocation of Port Solent with some amendments and suggested the further development of Southsea Marina and Trafalgar Wharf.
- **Portsmouth Cycle Forum** would like Portsmouth to be the country's pre-eminent cycling city.

[2] As referred to in the Town and Country Planning (Local Plan) (England) Regulations 2012

- The **Defence Infrastructure Organisation (DIO for MoD)** highlighted the importance of the MoD Safeguarding Zones in the City relevant to defence operations and the statutory consultation provisions under the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 and associated locational safeguarding mapping. The key sites include HMNB Portsmouth, MoD Horsea Island, Fleetlands Heliport and Defence Munitions Gosport. The Plan must safeguard relevant airspace around aerodromes and associated birdstrike safety zones (12.87km around military aerodromes). Care is required to ensure new developments do not introduce significant new landscaping/water bodies that bring flocking bird species into such zones.
- The **DIO (for MoD)** notes that the MoD does not object in principle to development within outer explosives safeguarding zones but design must be 'non-vulnerable' to blast effects and buildings above 3 storeys would be of concern. The MoD would object to development within inner explosives safeguarding zones where people would live and/or work. Renewable energy projects will also require careful attention to avoid impact upon radar, navigation and communications systems. Developments above 50m or within the vicinity of MoD Safeguarding Zones will be of interest to MoD.
- A number of individuals commented that the Local Plan is not sound, not legally compliant and does not comply with Duty to Cooperate as documents on the Local Plan Evidence page were not available when the Regulation 19 consultation went live. They highlighted the Legal Compliance Toolkit, Soundness Self-Assessment Toolkit, Houses in Multiple Occupation Topic Paper and several statements of common ground as not having been available.
- A number of individuals said that the Local Plan was too long and people needed a simpler document to read.
- A number of individuals said that greening the City should be more of a priority for the Council and that there were nature conservation issues that needed to be resolved.
- One individual said that the Plan did not address the needs of the ageing population sufficiently.
- Some individuals stressed the importance of certain strategic sites to the regeneration of the City.
- One individual said that the City Council should take advantage of the new radical powers from Government to make Planning 'a launch pad' for the delivery of 'the secure, affordable, attractive homes we need.'

Whole Local Plan - Council response

How the representations have been taken into account:

- Most representations have been taken into account under the more specific section of the Pre-Submission Local Plan to which they relate.
- The Council has continued working with a number of consultation bodies in line with their requests to do so. This has included signing statements of common ground to address any issues raised.
- Discussions between the Council and the NHS Hampshire and Isle of Wight ICB are ongoing in relation to submissions for Community Infrastructure Levy funding for healthcare premises. Engagement on future GP premises needs to deliver Local Plan growth is set out in the Interim Infrastructure Delivery Plan.
- A statement of common ground has been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- Statements of common ground have been prepared with Winchester City Council (dated August 2024 and October 2024), Fareham Borough Council (dated July 2024), and Gosport Borough Council (dated July 2024) to address the issues they have raised.
- A statement of common ground has been prepared with National Highways (dated February 2025) to address the issues they have raised.
- A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- The Council has maintained the end date for the plan period of 2040 notwithstanding comments from the HBF. The end date is in line with advice provided by the Planning Inspectorate in August 2025. If the Council had extended the plan period further it would have necessitated further evidence gathering which in turn would have necessitated further delay in plan making.
- A statement of common ground has been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.
- Amendments have been proposed in the Schedule of Changes to the Pre-Submission Local Plan 2024 to certain parts of the Local Plan in response to representations by the DIO (for MoD), including adding text to the Introduction section about the contribution made by the MoD to the City's economy. A statement of common ground has also been signed with the DIO (for MoD) (dated December 2024) to address the issues they have raised.

Chapter 1: Introduction

	Number of respondents
Total number of respondents	4
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.4 One respondent feels that the consultation process on the Local Plan is not much more than a tick box exercise and is undemocratic. They would prefer a more dynamic collaborative approach that works actively with the local communities via a system such as Polis. The same respondent suggests that the plan lacks ambition. Another respondent draws attention to the need for a stronger focus on rail travel in the Solent area including additional platform capacity at Portsmouth's main stations. Another respondent thinks that a link to the Strategic Transport Assessment should be included in this chapter. The fourth is generally positive.

A3.5 The following main issues were raised by specific consultation bodies on Chapter 1: Introduction:

- **Network Rail** highlight the higher-than-average reliance on the private car in South Hampshire. They point to the Solent Connectivity Study, published in 2020 which considers several investment choices to enable train service improvements.
- **Network Rail** propose the following wording to make the Local Plan sound: 'Solent Transport's Sub-Regional Transport Model (SRTM) was used to inform and evidence the Portsmouth Local Plan. Network Rail have produced a Solent Connectivity Study in 2021 which emphasises the opportunities to significantly improve connectivity by rail within Portsmouth and the wider PfSH area. This, and future studies, will be key pieces of evidence to inform the Local Plan and guide investment decisions within PfSH and Portsmouth for transport enhancements.'
- The **NHS Hampshire and Isle of Wight ICB** support the identification of need for new infrastructure that will be necessary to accommodate future development.
- **PCC LHA** asked for a summary and link to the Strategic Transport Assessment to be included in this chapter.

A3.6 The following main issues were raised by general and other consultation bodies on Chapter 1: Introduction:

- One individual was disappointed by the Vision, which they thought was pedestrian and unambitious.
- One individual thought that the Council should update its consultation methods to use interactive media.

Chapter 1: Introduction - Council response

How the representations have been taken into account:

- In response to a general comment on the whole Local Plan, additional text is proposed in the Schedule of Changes to the Pre-Submission Local Plan 2024 to be added to the Introduction to reference the contribution the MoD makes to Portsmouth's economy.
- In response to the comments from Network Rail, the STRM has been referenced in chapter 3 of the Portsmouth Pre-Submission Local Plan Addendum 2025 and the Solent Connectivity Study has been added to the Core Document Library. A statement of common ground has also been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- A link is provided in this chapter to the webpage hosting all of the Council's Local Plan evidence, so no change is considered to be required where representors have requested references to specific evidence documents be added.

Chapter 2: Vision & Objectives

	Number of respondents
Total number of respondents	5
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.7 Responses centre on the need to embed culture and a sense of history in all buildings in the City, regardless of whether they are residential or civic. Community neighbourhoods should be developed particularly using existing derelict sites. The focus should be on reuse, retention and retrofitting over demolition. Other points were raised about the need for timely and local GP services as being integral to individuals' wellbeing, and that the Local Plan should reflect Portsmouth's heritage of inclusivity and multi-culturalism, focusing on sustainability and the protection of vulnerable communities.

A3.8 The following main issues were raised by specific consultation bodies on Chapter 2: Vision & Objectives:

- The **NHS Hampshire and Isle of Wight ICB** supported the Local Plan objective of a healthy and happy City and would like to add that timely and local access to GP services is an integral part of enhancing an individual's wellbeing.
- The **University of Portsmouth (UoP)** supported the vision and objectives and thought that they aligned well with the University's aspirations for the City.
- The **Portsmouth Society** thought that the Vision should represent the City's diverse people, history and natural beauty. It stressed the importance of the City's cultural role and made general enquiries about how heritage was addressed both in the Local Plan and in the Heritage Strategy.

A3.9 The following main issues were raised by general and other consultation bodies on Chapter 2: Vision & Objectives:

- An individual made comments on good design.
- An individual made a number of comments on heritage assets and the local list, suggesting it should be reviewed. They also suggested that a presumption in favour of retention, reuse and retrofit of standing buildings rather than demolition was adopted.

Chapter 2: Vision & Objectives - Council response

How the representations have been taken into account:

- None of the comments recommended specific changes to the Vision & Objectives so these remain unchanged.
- Comments are largely covered in responses to other parts of the Local Plan.

Chapter 3: Development Strategy & Core Policies

	Number of respondents
Total number of respondents	12
Respondents who raised soundness	2
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	2

A3.10 Several respondents are positive towards this part of the Local Plan. Other comments cover a range of topics including making sure existing PCC assets conform to the requirements outlined in the Local Plan around preserving heritage and re-purposing sites to reflect the City's heritage and culture. Sites mentioned include: The Hard; the walkway next to the station looking out over HMS Warrior; the Museum garden; and the Old Records Office.

A3.11 Unmet coastal urban housing need is also mentioned in the general comments. There is concern over Partnership for South Hamsphire's (PfSH) ability to operationally deliver the necessary housing given they have no legislative power over its constituent members. Unmet housing need will inevitably be provided on greenfield sites in the wider Hampshire area in piecemeal fashion which will impact traffic on the M27, fail to create the necessary infrastructure, threaten natural habitats and fragment coastal communities.

A3.12 Finally, comments are also made about needing to put the net zero commitment front and centre in the Design Vision Statement, and that special care needs to be taken with Langstone Harbour, Portsmouth Harbour and Tipner West regarding their contribution to natural ecosystems.

A3.13 The following main issues were raised by specific consultation bodies on Chapter 3: Development Strategy & Core Policies:

- **Network Rail** support the design vision, especially in relation to making the City accessible and easy to navigate and providing sustainable transport options.
- **PCC LHA** welcome the overall development strategy for Portsmouth. They point out that the unmet housing need for Portsmouth that has been met in Fareham's Local Plan will likely mean greater external transport demand from Fareham into Portsmouth as development is brought forward, than would be expected if the development was within the City.
- **PCC LHA** ask that a brief summary of the Strategic Transport Assessment is added to the Local Plan, rather than requiring the reader to find and read the full report.
- **PCC LHA** state that this section of the plan could also reference that through PfSH, PCC needs to work with neighbouring LPAs to promote sustainable developments and travel options in the wider Portsmouth City region.
- **Historic England** consider that the Development Strategy should reference the City's rich cultural heritage and maritime history.

A3.14 The following main issues were raised by general and other consultation bodies on Chapter 3: Development Strategy & Core Policies:

- **New Forest District Council** welcome the recognition of PfSH and reiterated its own commitment to working with PfSH partners.

- **Portsmouth Independent Port** consider the Key Diagram should include icons for green city thriving economy and lifelong learning for the port.
- The **RSPB** cross-reference its comments on allocation Policies PLP3, 4, 8, 9 ,11, and 13 in which it stated that the policy wording is misleading or contains omissions that do not reflect the guidance of the Solent Waders and Brent Goose Strategy (SWBGS) and accordingly PLP42. The RSPB considers that the Local Plan is not legally complaint because of the treatment of functionally linked land by these policies.
- **The Campaign for Rural England (CPRE)** state that it has some issues with PfSH around its operational governance in terms of its transparency and stakeholder engagement. They state that a new strategic approach is required for South Hampshire that identifies major growth locations. This will attract the investment necessary to deliver the transport, utility, green and community infrastructure along with the homes that make up sustainable developments. They conclude by saying that the challenge for South Hampshire is to plan for sustainable development, plan for an effective public transport network, plan for new infrastructure and plan at a scale that will achieve the green infrastructure and community facilities that can create great places to live.
- **CPRE** object to the Regulation 19 Portsmouth Local Plan 2024, because of its failure to meet housing need as defined by the standard method and the consequential unsustainable development in the countryside around the City. They balance their objection with a call for a new strategic planning body in south Hampshire to plan for development at a scale that will deliver sustainable development. On that basis CPRE asked the Inspector to consider approving the Regulation 19 Portsmouth Local Plan 2024 with the major caveat that the City Council take a leading role in the devolution agenda and in establishing a new strategic planning body to plan for the City's unmet need in a truly sustainable and exemplar way. Without such a step change in plan-making then the countryside around Portsmouth will diminish to the detriment of the whole sub region.
- **Coastal Partners** note that the unlocking of Tipner West & Horsea Island East is contingent upon the construction of sufficient flood defences prior to occupation of the site.
- The **Langstone Harbour Board** state that it is crucial to emphasise the environmental implications of development particularly concerning Langstone Harbour.
- **UoP** welcome the vision, growth and investment objectives of the emerging Local Plan.
- One individual stresses the importance of The Hard, the Museum garden and Old Records Office site and suggests that further feasibility work should be done for these sites.
- One individual commented that the Council should only grant planning permission for low-rise attractive buildings in the City.

Chapter 3: Development Strategy & Core Policies - Council response

How the representations have been taken into account:

- The Introduction, Development Strategy, Key Diagram, Development Targets, Partnership for South Hampshire, and City Deal sections of Chapter 3: Development Strategy & Core Policies from the Portsmouth Pre-Submission Local Plan 2024 have been entirely replaced by a new Chapter 3: Development Strategy section in the Portsmouth Pre-Submission Local Plan Addendum 2025.
- The Core Policies section and policies on Design and Climate Emergency themselves are not replaced in the Addendum. Comments on Chapter 3 excluding the core polices have largely been addressed through the new wording in chapter 3 of the Portsmouth Pre-Submission Local Plan Addendum 2025.
- A statement of common ground has been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised. The findings of the Strategic Transport Assessment (STA) have been used to inform several parts of the Local Plan as appropriate, and the Council does not consider it appropriate to include a summary of the STA within the Local Plan itself, just as it has not included summaries of other evidence based documents.
- The Council has continued its work with neighbouring authorities and other bodies through the Duty to Cooperate and is in discussions with other authorities on plans for devolution.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.

Core Policy PLP1: Design

Core Policy PLP1: Design	Number of respondents
Total number of respondents	10
Respondents who raised soundness	2
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.15 Several respondents caution against building additional tall buildings without due care and attention to the existing Tall Buildings 2012 SPD. Of particular concern are historic areas such as the Historic Dockyard, Guildhall Quarter, Gunwharf and Portchester Castle. Impacting potential views of key landmarks is the main concern whether the City is approached by sea or motorway. Reference is made to high rise student accommodation of recent years and the approach taken to skyline management.

A3.16 Several respondents are very supportive of policy around new developments promoting healthier lifestyles, supporting sustainable transport, building climate resilience and protecting the natural habitats present at the Portsmouth Harbour site.

A3.17 Two respondents caution that internal silo working and lack of cooperation within the Council must be guarded against to ensure the delivery of high quality design.

A3.18 Historic England do not consider Policy PLP1 to be sound.

A3.19 The following main issues were raised by specific consultation bodies on Policy PLP1: Design:

- **Historic England** confirm that they do not object to the development of tall buildings in Portsmouth, they do however, consider the approach to tall buildings in PLP1 to be insufficiently justified and in conflict with national policy. They note that 'The careful siting of tall buildings in the context of placemaking' is considered a key issue for the historic environment in the Sustainability Appraisal. They are not convinced that the plan supports careful siting of tall buildings across Portsmouth. They also encourage the Council to prepare a new SPD on tall buildings informed by comprehensive heritage assessment and public consultation. In light of this, they propose two key changes to the Plan (that would enable them to find it sound on this matter):
  a) Adding a requirement for both heritage impact assessment and landscape and visual impact assessment. They suggest this could be integrated within a broader point about the need for design excellence (strengthening the point already made in paragraph 3.46), which they assert is crucial for tall buildings in what is a relatively flat city, and especially in its more sensitive locations;
  b) Reverting to the opportunity areas identified for tall buildings for Tipner in the adopted Portsmouth Local Plan rather than covering the whole of West Tipner (where tall buildings could threaten the dominance of Portchester Castle), unless evidence can be provided that a flexible approach would not cause unacceptable harm to the historic environment.
- **Historic England** note that criterion 2b of PLP1 refers to existing buildings or townscapes of heritage value when considering local context. They welcome this as far as it goes but consider that it sets an incomplete context for the historic environment, and is not aligned with national policy, as it omits other types of heritage asset such as Scheduled Monuments and Registered Parks and Gardens. They suggest amendments to Policy 2a) iii) and Policy 7 of PLP 1 to address their concerns:
  2. a) iii) 'Existing buildings or townscapes of heritage value <u>and the significance of heritage assets</u>.'

  7. A sub policy <u>(d)</u> should be added policy 7 within PLP1:

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

- **Historic England** consider that the approach to identifying areas of opportunity for tall buildings in PLP1 does not seem to adequately consider heritage significance. They assert that this approach risks creating conflict within the Local Plan and conflict with national policy regarding heritage conservation. The policies map referenced in PLP1 indicates large areas of the City are suitable for tall buildings. They note that the policy is supported by a Supplementary Planning Document (SPD) from 2012, which is supported by a tall buildings study from 2009. In heritage terms, they note the study

principally considers potential impacts on listed buildings and conservation areas within Portsmouth, giving relatively little attention to potential impacts on the setting of Scheduled Monuments or assets outside the plan area. They are concerned by the flexibility they think this offers, particularly in the following areas:

The Hard:

They suggest that the sensitivity of The Hard is readily apparent from the map on page 12 of the Council's tall buildings study. If this area is to be retained in the Local Plan, greater emphasis is needed in the criteria relating to design excellence.

The City Centre/Dockyard/Portsmouth International Port:

They retain a concern that tall buildings immediately adjacent to designated heritage assets has the potential to harm their setting and appreciation. They are particularly concerned by this close to the historic dockyard and throughout the Guildhall Quarter.

Tipner and Port Solent:

Regarding Tipner, they note the tall buildings study states: 'The relative proximity of Portchester Castle across the harbour 2km to the north east, and the historic dockyard 3km to the south west may be of significance in terms of the impact of proposed tall buildings on views towards or out of either of these areas.' The study's recommendation includes: 'Give consideration to their potential impact on views towards and from Portchester Castle across the harbour to the north west.' The study makes the same conclusion for Port Solent. Both recommendations are included in the SPD.

They query the extent to which these recommendations have informed the Local Plan and note the respective areas of opportunity for tall buildings in Tipner and Port Solent seem to have grown substantially from those shown in the study (on page 12) and in the adopted Local Plan, compared with those in the proposed policies map. They consider this especially problematic for West Tipner, where tall buildings near to the coastline could challenge the dominance of Portchester Castle in the harbour.

They consider that the flexibility being offered risks harm to heritage assets of high significance. They also consider that it risks internal conflict within the plan (PLP1, PLP3, PLP54, PLP53 and PLP56).

In response to their concerns, they recommend reverting to the area of existing adopted area of opportunity for tall buildings in Tipner.

They also assert the need for clarity on the assessments needed to support this process, being explicit about the need for both a heritage statement/heritage impact assessment and landscape & visual impact assessment. They suggest wording for consideration, linked with a new requirement within criterion 7.

- **Historic England** note that the pursuit of high-quality design connects with the use of a Design Review Panel. They also recommend strengthening the reference to the need to test concept plans as outlined in paragraph 3.36 on page 20. They consider that the current wording provides a weak requirement to engage with the City Council, local community / stakeholders and/or a design review panel. As a final point, they also note that paragraph 3.48 refers to 8 areas, but the policy refers only to 7 areas.
- **Natural England** commented on the potential impacts to the Portsmouth Harbour SPA and associated functionally linked land, that have been considered through the Plan

shadow Habitats Regulations Assessment (sHRA). The need to consider these impacts are covered in PLP1 paragraph 3.49 and PLP39. Natural England welcome this inclusion within the Local Plan and agree the policies are appropriate.

- **PCC LHA** support paragraph 2)d) (Movement) of PLP1, but request that reference is added that developers should follow guidance in Manual For Streets, which is the nationally recognised guidance for those involved in the planning/ design of residential streets. They also request that it is noted in the Portsmouth Transport Strategy under the strategic objective 'Prioritise Walking and Cycling' (page 21), and in Policy I, reference is made to the recommendation in Manual for Streets that within the design of a scheme, a user hierarchy should be followed, with consideration being given to road users in the following order of priority: pedestrians, cyclists, public transport users, specialist service vehicles, other motor traffic.
- **PCC LHA** support the Design Vision in paragraph 3.31, and in particular the references to sustainable transport, carbon neutrality and related matters. The Design Vision could be more specific about how development itself, and particularly strategic development, should contribute to achieving these particular objectives both within new development, and more widely. For example, through providing or part funding new sustainable transport infrastructure which may benefit communities more widely, and through behaviour change measures which encourage adoption of more sustainable modes of travel by residents.
- **PCC LHA** agree with the statements made in paragraph 3.34 encouraging developers to take into account key characteristics including sustainable movement, from the first steps of masterplanning.

A3.20 The following main issues were raised by general and other consultation bodies on Policy PLP1: Design:

- **PCC Public Health** ask that the final paragraph of the Design Vision sits either at or much closer to the top of the Design Vision statement, and is reworded to focus primarily on climate resilience, mitigation and adaptation, while maintaining the commitments to net zero and sustainability.
- **HIWWT** welcome the inclusion and content of the Council's two core policies - PLP1 (Design), and PLP2 (Climate Emergency). They consider both crucial for ensuring the Local Plan aligns with the obligations of the Environment Act 2021 and Levelling Up and Regeneration Act 2023. They also strongly welcome the references within PLP1 to the National Model Design Code and the reflection of the important role of natural green infrastructure in delivering well designed beautiful and resilient, sustainable places.
- **NHS Property Services** welcome and support the inclusion of policies that support healthy lifestyles. There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure by enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.
- **Solent Protection Society** believe the draft documents to be sound, legally compliant and meeting the Duty of Compliance, they did however, provide further comment on a range of points which they consider as observations relevant to the examination. For the growing number of cruise passengers arriving at Portsmouth International Port, the view of the City's waterfront and the welcome offered by the narrow, historically fortified harbour entrance are essential to their experience of the City.
- **Solent Protection Society** consider that the City's skyline has been disrupted by a disjointed array of high-rise blocks, many of which are characterless student

accommodation with uninspired cladding. While the Guildhall clock tower remains a prominent landmark for arriving passengers, its place on the Solent skyline has been altered beyond recognition. Even in the age of satellite navigation, the view from the sea to seafarers remains as significant as it does to arriving passengers. When the Home Heights high-rise development was built in the 1970s, an unintended consequence of the planning process was the loss of a crucial navigational leading line from the Royal Navy war memorial to the spire of St. Jude's Church.

- **Solent Protection Society** note that Core Policy PLP1: Design, talks to the Rhythm of existing and surrounding buildings' "building height", but the City planners must remain mindful of the June 2012 Supplementary Planning Document on Tall Buildings. The Society's review of the Local Plan policies shows that Portsmouth has only one direction for growth. With high-rise development being inevitable, careful consideration of the skyline is crucial when drafting, validating, and approving individual plans. Attention should be given to how the City will appear to visitors, not just from the sea, but also to those arriving via the motorway routes. As the City's skyline inevitably evolves, preserving overall coherence within the broader context of the surrounding landscape is essential for enhancing the City's international recognition. The initial two iconic structures of Gunwharf should continue to stand out in the twenty-first-century skyline.
- **The Portsmouth Society** highlights that 'beauty' is no longer a criterion in national planning documents, and that there needs to be a more appropriate term introduced.
- **The Portsmouth Society** ask for an amendment to paragraph 3.40, they note that earlier in the document (paragraph 3.40) it states, 'Where required, comprehensive Design and Access Statements (or similar, as appropriate) will be expected as part of a pre- application or planning application submission.' They ask that this requirement be the default as opposed to the exception.
- **The Portsmouth Society** comment on paragraph 3.46 Tall Buildings: the City's buildings are the dominant feature of City skyline so it is especially important to make the correct decisions on the location of tall buildings in the City, and insist on the highest standards of architectural quality. They suggest that cost frequently outweighs design or quality when it comes to the City's tall buildings as evidenced by discussions at Planning Committee on student halls applications in the past. Going forward, they ask what will be done to ensure positive change here.
- **The Portsmouth Society** also comment on paragraph 3.47: Historically in Portsmouth, tall buildings have been dealt with on an ad hoc basis, which has not always produced the best results. Therefore, it is important to have a coherent strategy setting out appropriate locations and design criteria for tall buildings. This is essential if Portsmouth City Council wish to present our City at the optimum level of architectural design and in the best possible light, particularly as land is restricted Portsmouth already has a Tall Buildings Strategy. The Society argues that the Tall Buildings Strategy (also known as the Tall Buildings SPD) needs to be made clearer and enforced/applied for all new developments.
- One Respondent commented on Design Quality and Cultural Status of the City. They note that the Draft Local Plan is full of policies emphasising the strategic importance of achieving high quality design and cultural status for 'a city of destination.' They further comment on the failures of local government, and the 'silo working' of different departments following their own internal agendas and budgets. They consider that the Local Plan looks at the management barriers to achieve better standards of delivery of new housing and services and this should include the internal barriers between departments as well as with developers and landowners.

- The same individual commented that Portsmouth has a rich 'civic' history which tends to be overshadowed by its naval history and it has not been given the cultural platform it deserves. Cultural regeneration is an essential part of housing, transport and all the other services the Council provide; it must be built-in to the design concepts not treated as a separate portfolio for entertainment and leisure. A city's culture is seen in the quality of its spaces and buildings and landscaping, not just in its leisure venues. They hope that the Local Plan's strong emphasis on design quality and cultural status will be reinforced by a meaningful cooperation between the Council's Departments to achieve its objectives.
- One Respondent referenced a number of policies and supporting paragraphs in their response to PLP1: Design, in relation to the former Records Office site on Museum Road, but made no comments on them.
- One respondent commented in relation to policy PLP1 Design paragraphs 3.27-3.37, that in their initial response to the Local Plan in 2021 they asked for reinstatement of the Design Review Panel which used to advise the City planning department on the design quality of major planning applications. They comment further that Design Review Panels are small multi-disciplinary groups of professionals offering detailed design advice and provide an independent, expert assessment of significant proposal. These panels have now become established as an integral part of the planning process as a tested system of ensuring good design practice. The process ensures impartial, independent and constructive advice for a wide range of development proposals and occurs before the submission of a planning application. The importance of the Design Review Panel is emphasised through the National Planning Policy Framework in Paragraph 129.
- They also commented on the Public Art Policy. As well as designed new buildings and sustainably adapted existing ones, Portsmouth needs a rich well-designed public realm which includes the incorporation of public art from the beginning of the design and development process. They note that Bristol's Local Plan stipulates that any large development should have a public art element with artist appointed from feasibility stage. In a city uniquely threatened by the climate crisis Portsmouth presents a sad contrast to this in the failed and current attempt to incorporate excellence in design and public art into the engineers remodelling of the seafront.
- One respondent commented that they considered the plan sound because: 'it all seems above board and it complies with the duty to co-operate.'

Core Policy PLP1: Design - Council response

How the representations have been taken into account:

- In response to Historic England's representation, the Council has proposed amendments to Policy PLP1: Design in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground was prepared with Historic England (February 2025) following consultation on the Portsmouth Pre-Submission Local Plan 2024 which addressed the issues they raised (February 2025).
- The representations submitted by Natural England, HIWWT, NHS Property Services and Solent Protection Society are either supportive of Policy PLP1: Design and/or general statements on PLP1 which do not specify any changes to the policy. Statements of common ground have also been prepared with Natural England, and jointly with RSPB and HIWWT to address the issues they have raised.
- In response to the request from PCC LHA to add a reference to the Manual For Streets, the Council has proposed adding a reference to this, under para 3.39, in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has also been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- Having considered PCC Public Health's representation, the Council does not consider it necessary to make a change to the Design Vision as the criteria are not listed in order of importance.
- In response to The Portsmouth Society's representation, the Council does not consider it appropriate to make Design and Access Statements a default requirement for all proposals as they can only be mandated where supported by Government guidance. In response to their comments about the Tall Buildings Study (also known as the 'Tall Buildings SPD'), the Council is satisfied that the SPD already provides a comprehensive set of criteria for applicants to address when bringing forward proposals for tall buildings. Furthermore, regard to the Tall Buildings SPD is only triggered for proposals where the building(s) are above 5 storeys or 20 metres tall. Therefore, it is not appropriate for the SPD to be applied to all new development. Their comment about the use of term 'Beauty' is acknowledged, and amendments have been proposed, where relevant, in the Schedule of Changes to the Pre-Submission Local Plan 2024 following a review of changes made to national policy through the 2024 NPPF. Other comments submitted by The Portsmouth Society are general statements, and do not propose any changes to Policy PLP1: Design.
- An individual's representation on the former Records Office site is acknowledged by the Council. However, they are general comments which do not specify any changes to the policy.
- An individual's suggestion to reinstate a Design Review Panel is acknowledged. However, the Council does not deem it necessary to make any changes to the policy. This is a matter that can be considered outside of the Local Plan process.

Core Policy PLP2: Climate Emergency

	Number of respondents
Total number of respondents	8
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.21 Several respondents object to the proposals for Portsmouth Harbour and Tipner West based on not fulfilling biodiversity requirements and threatening vital natural habitats. A few respondents reference policy on flood mitigation and control of surface water. Whilst most are positive towards the policy, one would like additional criteria added to the policy to create the necessary step change in developments. A few others would like climate resilience to be more prominent and more intrinsically linked to core policy. They feel decarbonisation has been given too much prominence with insufficient explanation of how that will be delivered.

A3.22 The following main issues were raised by specific consultation bodies on Policy PLP2: Climate Emergency:

- **Southern Water** support the general policy direction shown in the Local Plan in the Climate Change chapter starting on page 25, in particular the following wording of Policy PLP2: 'e.) Reduce the risk of flooding both now and in the future, taking account of predicted sea level rises and the impact on areas vulnerable to coastal change.'
- **Southern Water** recommend additional criterion to be included in this policy to help create the step-change needed in designing our communities for resilience to climate change, in particular to the risk of rainfall-related flooding as follows:
  'Take account of flood risk and coastal change through their location and design, existing flow routes and drainage features within the site should be identified and preserved e.g. ditches, seasonally dry watercourses, historic ponds.
  Integrate sustainable drainage systems, to minimise and control surface water run-off, provide flood storage capacity and improve habitats and species migration.
  SuDS measures should include source control components such as rainwater re-use/harvesting, green roofs, rain gardens, trees, permeable paving. Multi-functional SuDS features should be used to meet several planning policy requirements within the same area of the site e.g. biodiversity, amenity, green infrastructure, flood risk, drainage.'
- **Southern Water** state that planning policy needs to go further as climate change now demands we re-think and re-design communities. Southern Water acknowledge that the Plan, encourages more resilient and efficient homes are essential, conserving both energy and water. They ask that design will not mean that rainwater continues to run off homes and surfaces so fast that it causes flooding and storm discharges into rivers and seas. By attenuating surface water during rainfall periods, SuDS can improve existing flood risk and water quality.
- **Southern Water** is working across the region to remove surface water from their networks in key areas. They are concerned that development continues to increase surface water run-off.
- **Southern Water** consider that it is important to consider the measures called for in response to the climate crisis now. Measures should support the attenuation of flows of surface water run-off from rainfall, as well as surface water infiltration into the ground

wherever possible in the local environment. Retrofitting sustainable drainage solutions is challenging.

- **Network Rail** support the Policy and its intent to reduce environmental impacts. Parts e) and g) within the Policy are important considerations for Network Rail as there is potentially increased risk of surface water flooding on the railway and its infrastructure (e). Promoting active travel and public transport is supported. There are significant benefits from ensuring that new development provides direct, safe and convenient routes to public transport hubs, especially rail stations.
- **PCC LHA** suggest adding reference to shared modes in paragraph 1g), and also the addition of the wording: 'and take steps to reduce the need for residents/users to travel, particularly by un-sustainable modes' to the end of this paragraph.
- **Historic England** support this policy, including its encouragement for reuse of existing buildings and structures. They recommend acknowledging the (positive) heritage implications of retaining and reusing historic buildings.

A3.23 The following main issues were raised by general and other consultation bodies on Policy PLP2: Climate Emergency:

- **The Portsmouth Society** state that the adaptive reuse of existing buildings including listed buildings is in line with changing national environmental policy aimed at achieving net zero. Nationally there is a much stronger emphasis on adaptive reuse of existing buildings - which is a key element of achieving net zero.
- The **Milton Neighbourhood Forum** state that core policy on Climate Emergency PLP2 would have greater effect with the deletion in 1.g) of the qualification 'wherever possible' in relation to active travel and public transport over car use.
- **HIWWT** welcome the overarching provisions and topics included within Core Policy PLP2: Climate Emergency, as these will be essential for ensuring the plan supports delivery of the Environment Act targets. HIWWT would recommend that Core Policy PLP2: Climate Emergency is updated to reflect the Council's declaration of a nature emergency, to: 'Core Policy PLP2: Nature and Climate Emergencies.' This would reflect the dual emergency declarations already made by the Council and help ensure compliance with the obligations of both the Climate Change Act 2008 and Environment Act 2021 in tandem.
- **HIWWT** state that to ensure core policies, and their associated legal obligations, are reflected throughout the Local Plan, subsequent policies must provide suitably detailed, robust, and effective means by which these goals can be both defined and realised, in line with the latest related evidence. They provide recommendations to ensure these policies, and their associated aims, are fully reflected, embedded, and can ultimately be delivered, through the Local Plan.
- **PCC Public Health** welcome the statement that the climate emergency, is mission critical for achieving the 2040 City Vision. However, while the aspirations set out in the Vision are clearly important and remain guiding principles, they feel that climate resilience is not being positioned as a sufficiently prominent driver. They say there is increasingly a need to think beyond 2040 in terms of climate resilience; what we put in place now in terms of development and green and blue infrastructure must be as future proofed as possible for an increasingly extreme climate not just in 2024-2040, but in the decades thereafter.
- **PCC Public Health** state that the two core (design and climate change) policies should be more convincingly interwoven if the City is to achieve climate resilience.

- **PCC Public Health** refer to a document prepared by the Red Cross, which asks for greater urgency at all levels of government across the UK. One of their recommendations is that direct policy intervention is made to enable people most at risk to adapt to heatwaves. Adaptation to buildings and urban planning is critical to tackle indoor and outdoor heat.
- **PCC Public Health** highlight that the Plan is not clear about what is meant by development proposals storing carbon in this context and would suggest rephrasing.
- **PCC Public Health** state that criterion d) of the policy is the most important and should be moved from d) to a) or b).
- **PCC Public Health** highlight that in table 8.1, the Greening Strategy and Delivery Plan (2023) is missing as a strategy addressing the climate emergency.
- **PCC Public Health** feel that this chapter would benefit from a greater focus on climate resilience, in addition to its focus as it currently stands on decarbonisation. The chapter also to some degree conflates air quality and climate change; though it can be worsened by it, and contributes to it, air pollution is not caused by climate change.
- **PCC Public Health** state that the chapter makes multiple references to the Climate Emergency Strategy (2020), but many fewer to the Council's Climate Change Strategy (2022); it would be helpful either to explain their relation to each other or check with the Principal Strategy Advisor for Climate Change as to whether the later documents supersedes the earlier one.
- **PCC Public Health** highlight that the 2022 strategy discusses climate resilience, while the earlier one does not explicitly mention climate resilience at all and has only a brief section on adaptation. The 2020 document and indeed this chapter therefore, have a focus skewed towards decarbonisation and away from climate resilience. As both the City and the nation are likely to fall short of upcoming net zero targets, it is clear that we must ramp up our efforts to make the city climate resilient
- An individual commented that adaptive reuse of existing buildings including listed ones is in line with changing national environmental policy aimed at achieving net zero. Nationally there is a much stronger emphasis on adaptive reuse of existing buildings, which is a key element of achieving net zero.

Core Policy PLP2: Climate Emergency - Council response

How the representations have been taken into account:

- The Council does not consider that the additional criteria suggested by Southern Water are necessary as their concerns are sufficiently addressed through Policy PLP33: Sustainable Construction and Onsite Renewable Energy. A statement of common ground has also been prepared with Southern Water (dated September 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- In response to comments from PCC LHA, the Council has proposed rephrasing criterion 1.(g) in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has also been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- In response to Historic England's representation, the Council has proposed amendments to Policy PLP2 in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has also been prepared with Historic England (dated 2025) to address the issues they have raised.
- The requested change to criterion 1.(g) by the Milton Neighbourhood Forum has not been made as the proposals would not conform with the change made in response to PCC LHA nor the Council's intended policy direction. A statement of common ground has also been prepared with Milton Neighbourhood Forum (dated August 2024) to address the issues they have raised.
- The change recommended by HIWWT to add reference to the nature emergency in the policy has not been made as the Local Plan covers this in chapter 9 policies. It was felt that adding the nature emergency to the climate emergency policy would make the policy unduly broad, although the Council does recognise the interrelationships between the two. A statement of common ground has been prepared jointly with the RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- In response to the PCC Public Health representation, the Council has proposed to rephrase Policy PLP2 criterion 1.a) in the Schedule of Changes to the Pre-Submission Local Plan 2024. However, the Council has not changed the order of the criteria in the policy as the criteria are not listed in order of importance. The Council has proposed to add the missing strategies into table 8.1 in the Schedule of Changes to the Pre-Submission Local Plan 2024 according to their suggestion. A Statement of Common Ground has also been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.

Chapter 4: Strategic Sites

	Number of respondents
Total number of respondents	6
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.24 Half of the responses relate to transport and the need to ensure all allocated sites are planned with connections to South East Hampshire Rapid Transit and the Local Walking and Cycling Infrastructure Plan in mind, and that thought has been given to how Hampshire residents will access employment opportunities at the sites, and that the existing road network will not be negatively affected by the development.

A3.25 The other responses relate to the sewer system and surface water management: Southern Water will require easements at many sites as sewers are located within the proposed sites, local sewer network enforcement must be included in all subsequent local plans, and policy criterion for surface water management should be applied to all sites.

A3.26 The following main issues were raised by specific consultation bodies on Chapter 4: Strategic Sites:

- **Historic England** recommend additional wording is added to table 4.1, regarding Tipner and Horsea Island East, and PCC should be more explicit about the high-level heritage benefits that would be delivered via development of such strategic sites. Proposed wording is as follows (additions underlined):
  Tipner and Horsea Island East:
  - Flood defences
  - Land decontamination
  - New bridge
  - Conservation and reuse of listed buildings and conservation and appreciation of the Scheduled D Day slipways

  Portsmouth City Centre:
  - 2.9ha park
  - 20% Biodiversity Net Gain at City Centre North
  - Enhanced Culture and Lesiure offer, including greater appreciation of the City's heritage
- **Southern Water** point to sewer network reinforcement being needed to deliver growth included in the Local Plan. This is based on preliminary assessments of capacity of existing infrastructure and its ability to meet forecast future demand. Limited capacity to accommodate the number of dwellings proposed is highlighted at:
  - PLP3: Tipner West & Horsea Island East
  - PLP4: Tipner East
  - PLP5: Lakeside North Harbour
  - PLP6: Portsmouth City Centre
  - PLP7: Fratton Park & the Pompey Centre
  - PLP10: Land West of Portsdown Technology Park,
  - PLP11: Port Solent
  - PLP15: Somers Orchard

  For these policies, Southern Water suggest revisions to policy wording and subsequent planning conditions relating to the phasing of development, to align to sewer network upgrades, with the following criterion included: 'Occupation of the development may need

to be phased to align with the delivery of upgrades to sewerage infrastructure, this to ensure that adequate capacity is available to accommodate the number of dwellings. This phasing would be done in liaison with the service provider.'

- **Southern Water** outline additional appropriate surface water management criteria for all allocated sites (they are included in some but not all allocations) to state that sites should: '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 (pursuant to the Water Environment Regulations)'
- **Southern Water** put forward additional criteria for all site allocation policies, to respond to the significant risk, set out in their Drainage Water Management Plan for East Hampshire, as follows:
  - 'Ensure that surface water is managed as close to its source as possible, using the following discharge hierarchy: i. Rainwater re-use (rainwater harvesting) ii Discharge into the ground; then iii. Discharge to a surface water body; and then iv. Discharge to a surface water sewer or highway drain or other drainage system.
  - Existing flow routes and drainage features within the development site should be identified and preserved e.g. ditches, seasonally dry watercourses, historic ponds.
  - To minimise the risk of sewer flooding and protect water quality, surface water will not be permitted to discharge to the foul or combined sewer network.
  - Integrate the provision of a Sustainable Drainage System (SuDS) to mitigate the risk of surface water flooding, where viable.'
- **Southern Water**, in relation to infrastructure on allocated sites, highlight that their mapping records reveal their underground infrastructure crosses some of the site allocations. This needs to be taken into account when designing the site layout. Southern Water recommend the following criterion is added to the policies for these site allocations (Lakeside North Harbour, Portsmouth City Centre, Fratton Park & the Pompey Centre, St James' and Langstone Campus, Port Solent, St Johns College, Fraser Range, The News Centre and Somers Orchard): 'layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purposes.'
- **Southern Water** propose the following criterion solely for Policies PLP8 St James' & Langstone Campus, PLP11 Port Solent and PLP13 Fraser Range: 'The land proposed for development contains a sealed pressurised sewer rising main pipe; these are strategic assets through which pumping stations will pump wastewater. As these assets are deemed critical sewers, a developer will need to make a sewer diversion application to Southern Water requesting that they relocate the pipe, if viable. It is not permissible for a developer to divert these assets or to build over/near them.'
- **Hampshire County Council (HCC)** highlight that for sites PLP3, PLP4, PLP5 and PLP10, local and cross boundary transport impacts will need to be addressed in future site specific Transport Assessments accompanying planning applications. These should assess how development can integrate with the South East Hampshire Rapid Transit and PCC Local Cycling and Walking Infrastructure Plan proposals that cross into Hampshire, and assess and mitigate any severe impact on roads and junctions within the Hampshire local highway authority managed highway network.
- **HCC** recognises the constraints and limited opportunities in Portsmouth for large scale developments and continues to support the Government's towns and cities first policies. They suggest the strategic sites and site allocations providing employment (specifically PLP3, PLP5, and PLP10) need to show how Hampshire residents in the neighbouring boroughs could access the employment opportunities presented within development

sites by all modes of transport. This is to enable Hampshire residents to access the job opportunities within Portsmouth, as part of the economic market area for south east Hampshire.

- **National Highways** state that given that Strategic Site Allocations PLP3 (Tipner West), PLP5 (Lakeside North Harbour) and PLP9 (Horsea Island Open Space) are adjacent to or nearby the Strategic Road Network (SRN), without consideration of mitigation measures they have the potential to impact on the safe and efficient operation of the SRN. National Highways look forward to continued engagement on these sites as they are developed.
- **Havant Borough Council** note that the links are broken for footnotes 48 and 49.

A3.27 The following main issues were raised by general and other consultation bodies on Chapter 4: Strategic Sites:

- **HIWWT** consider there to be a lack of ambition to deliver nature's recovery through the strategic developments.
- **Coastal Partners** note that the links are broken for footnotes 48 and 49.
- **Langstone Harbour Board** comment that The Solent Local Enterprise Partnership (LEP): Maritime Futures: Solent Waterfront Sites document (2015) does not identify Broadmarsh as a potential site. They recommend that this document be updated as The Waterfront Sites Register should be a live document that is updated on a regular basis. To ensure the register is kept up-to-date, ownership of the register should be given to the Solent LEP who would (at least once a year) coordinate responses from local authorities of the Solent LEP area. It is critically important that LEP/PCC engage with Havant Borough Council and Tarmac to consider options at Broadmarsh (light industrial, leisure and small commercial marine) and Bedhampton (alternative use for quayside and potential commercial expansion area for PIP). Paragraph 5.3.2 refers to Southampton Port but is equally applicable to Portsmouth. Langstone Harbour Office site should also be considered a strategic opportunity for small commercial and fishing operations. It is ideally positioned to take advantage of emerging aquaculture and/or renewable sector trade and with some investment could build existing local capacity for small commercial vessel operations (including pilotage, workboats and inshore fisheries).

Chapter 4: Strategic Sites - Council response

How the representations have been taken into account:

- The introduction to Chapter 4: Strategic Sites from the Portsmouth Pre-Submission Local Plan 2024 has now entirely been replaced with a new introduction to Chapter 4: Strategic Sites in the Portsmouth Pre-Submission Local Plan Addendum 2025. Issues raised on this chapter have largely been covered by the new chapter.
- Site-specific comments are covered against the relevant site policy.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- In response to Southern Water's representation, the Council has proposed amendments to Policy PLP32: Sustainable Drainage Systems in the Schedule of Changes to the Portsmouth Pre-Submission Local Plan 2024. The Council does not consider it necessary to add the additional criterion, suggested by Southern Water, to policies PLP8, PLP11 and PLP13 regarding existing wastewater infrastructure as it is a matter that would be addressed at the planning application stage. The Council continues to liaise with Southern Water regarding the provision and capacity of wastewater infrastructure. A statement of common ground has been prepared with Southern Water (dated September 2024) to address the issues they have raised. The IDP also sets out the infrastructure that is required to be in place to unlock development on a site.
- In response to HCC and National Highways' comments, potential transport impacts of development of strategic sites have been taken into account. A statement of common ground has also been prepared with National Highways (dated February 2025) to address the issues they have raised.
- A statement of common ground has been prepared jointly with the RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- No changes have been made in response to the representation from the Langstone Harbour Board. They refer to Broadmarsh which is in Havant Borough and the Solent LEP which has been disbanded.

Strategic Site Allocation Policy PLP3: Tipner West & Horsea Island East

	Number of respondents
Total number of respondents	6,440
Respondents who raised soundness	6,429
Respondents who raised legal compliance	6,427
Respondents who raised Duty to Cooperate	5

A3.28 The vast majority of responses were via a set series of paragraphs drafted by the RSPB and HIWWT as summarised below. Whilst many responses welcome the abandonment of the former 'super peninsula' option as set out in prior Regulation 18 consultations, concerns remain focused upon the impact of development upon protected habitat sites and species, in particular the Portsmouth Harbour SPA and Ramsar designations and reference is made to the Council's duties under the Environment Act to protect biodiversity. Statutory consultees, notably Natural

England and Environment Agency, considered the Pre-Submission Local Plan to potentially fail the soundness and legal compliance tests because the accompanying Habitats Regulations Assessment (HRA) was considered to have provided insufficient detail on the compensation site strategy as required by the Habitats Regulations, such that there would not be enough confidence in the delivery of such compensation to address the potential harms caused to coherence of the national site network. General consultation bodies expressed similar concerns.

A3.29 Impacts upon the setting of Portchester Castle and the Scheduled D-Day slipways at Horsea Island East are also highlighted, notably by Historic England. Other concerns focus upon the risks associated with the release of site contamination from historic uses, the importance of restoring the on-site heritage assets, the apparent absence of other proposed community facilities (school, leisure), the release of sequestered carbon from the mudflats, concerns about the need for dredging to reach deep water and more broadly the financial cost of the project for the Council.

A3.30 A total of 6,415 people submitted representations on Policy PLP3: Tipner West & Horsea Island East in response to the RSPB and the HIWWT *Tipner West: Don't Cross the Line campaign*[3]. **The first paragraph of the 'standard' email could be written in free text and the following four paragraphs were identical.** The following main issues were raised on Policy PLP3: Tipner West & Horsea Island East in the standard emails. A summary of the 'standard' email responses is provided below (please note that further individual comments made in some of the standard responses are summarised below with other individuals and organisations):

- Objects to Policy PLP3: Tipner West & Horsea Island East on the grounds that it will damage internationally important wildlife sites in Portsmouth.
- Agrees with the points raised by the RSPB and Hampshire and Isle of Wight Wildlife Trust.
- PCC has a duty under the Environment Act in regard to conserving and enhancing biodiversity.
- Policy PLP3 does not comply with this duty as it allows for the loss of 2.1-6.5 hectares of land protected by international nature conservation designations and additional impacts on surrounding areas including feeding areas for over wintering birds.
- The mudflats that will be lost also play a role in carbon storage.
- Welcome the withdrawal of the super-peninsula concept.
- The current scheme would still result in the loss of land greater than Fratton Park football stadium and could result in the loss of up to three times that amount.
- The Council's case that there are no alternative solutions and that there are imperative reasons of over-riding public interest (IROPI) is flawed.
- The policy is not justified.
- The policy is not legally compliant with the legislation protecting international nature conservation designations and does not comply with the Council's duty to further biodiversity.
- This is the first time that the derogation tests have been used for a local plan.
- People do not want Portsmouth to set a precedent that harms biodiversity and paves the way for other LPAs to do the same.

[3] https://www.hiwwt.org.uk/tipner

- The Council should find an alternative development solution that is within the ecological limits of the site and does not build on protected habitats, which store carbon and are valued by the local community.

A3.31 The following main issues were raised by **PCC as the site promoter (represented by Savills)** on Policy PLP3: Tipner West & Horsea Island East:

- PCC as promoter support the proposed allocation of Tipner West and Horsea Island East. However, to assist future users of the Plan they made some suggestions on amended wording to assist with clarity.
- With regard to paragraph 4.6, they note that the first sentence of the paragraph could be read as meaning that there is deep water access immediately adjacent to the terrestrial land mass at Tipner West, with no dredging required, which is incorrect. Furthermore, the inference of housing at Tipner West as *only* providing enabling development for marine employment and the enhancement and re-use of the heritage assets on the site omits the additional benefit of assisting with meeting housing need. Amended text is proposed to add that the new housing alongside a new marine hub would assist in meeting housing needs and provide socio economic and sustainability benefits.
- PLP3, 1.a) does not recognise the full suite of uses that may contribute to the creation of a successful marine employment hub. For example, ship brokerage services or other marine employment activities that do not neatly fall into the Use Classes detailed within the policy. It is suggested that the permissible marine employment activities at Tipner West be broadened to include those that can demonstrate that they will contribute to the competitiveness of the Solent marine economy. Amended text is proposed to include other economic uses that would be functionally linked to marine employment.
- PLP3, 2.a) should have the word 'beautiful' replaced by 'high quality' to align with the proposed changes to the NPPF.
- It is noted that PLP3, 2.b) appears to relate to two separate matters namely connectivity (actual and perceived) and the Portchester Castle heritage asset and this policy criterion should be subdivided.
- It is noted that site contamination would, to a significant extent, be mitigated by way of capping through land raising, rather than full-scale remediation. So criterion 2(q) should be amended to indicate that there could be a combination of mitigation or remediation solutions.
- With regard to paragraph 4.20, the promoters of the TRP project consider that the requirement for the offices would be better described as 'functionally linked' to marine employment activities rather than as 'incidental'. The latter is both unduly limiting to the functionality of the marine employment hub and will restrict flexibility between different employment uses on site, where this is required due to changing economic circumstances or requirements.
- In paragraph 4.28, it is considered that the nature of the necessary flood defence provision is not made clear and that whilst these are expected to be delivered as part of the development project, there should be an allowance for financial contributions to be made in lieu of such direct provision, to align with the tests set out in Regulation 122 of The Community Infrastructure Levy Regulations 2010 (as amended). Amended text is therefore, proposed.
- With regard to table 4.2 at paragraph 4.38, the TRP Project promoter does not consider the requirement for the local shop or community facilities to be open when the first homes and business premises are occupied would be commercially attractive or viable for prospective operators. It is likely that the developer of the Tipner Regeneration Project will physically deliver the shop and community facilities, however the facilities will

be operated by a third-party operator. As such amended wording is sought to allow such provision to align with the phased delivery of the project.

A3.32 The following main issues were raised by specific consultation bodies on Policy PLP3: Tipner West & Horsea Island East:

Natural England:

- Policy currently considered UNSOUND due to (a) the evidence base forming part of the HRA is insufficient to confirm that the Derogation Tests could be satisfied, notably in respect of compensation strategy; and (b) consequent inconsistency with the NPPF.
- Option A is likely to be less ecologically damaging than Option B.
- The compensation metric (HRA paragraph 8.131) is a useful tool to inform the scale of requirement for compensatory habitat and Natural England will continue to work with PCC to refine this.
- Insufficient certainty over the feasibility of the 400 ha which relies upon assumptions and information to which Natural England are not party to.
- Appropriate Assessments cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt.
- It is therefore, possible that the potential identified compensation land for the Tipner allocation may be already apportioned to another plan or project.
- As it currently stands, should a HRA derogation for this Local Plan be sought due to the inclusion of allocation PLP3, Natural England's advice is that, as a plan-making authority, PCC does not have enough information to adequately demonstrate necessary compensatory measures have been, or can be secured.
- Natural England's position on soundness is a holding position and will be reviewed pending further information from the LPA with regard to the compensation strategy.

Environment Agency:

- The Plan is not legally compliant, it is not sound but complies with the Duty to Cooperate.
- They have concerns regarding the deliverability of the site, especially in relation to biodiversity. Currently the Environment Agency do not feel that the evidence provided demonstrates the allocation could come forward without damage to the environment, specifically the internationally and nationally designated sites. The Environment Agency's main concern is that there is not enough evidence or certainty regarding the availability and delivery of required mitigation/compensation sites. The HRA provides no certainty that the replacement habitat can be found and/or detail available as to the lead-in time for replacement habitat of sufficient quality and function before the loss occurs.
- The HRA fails to have regard to losses accounted for in the Shoreline Management Plan and the associated Habitat Compensation and Restoration Programme e.g. resulting from increasing the size of flood defence, encroachment into the intertidal.
- The HRA does not reflect concerns raised in Regulatory Panel meetings about the absence of detail on compensatory sites and as such the Environment Agency cannot support the level of confidence assigned in the HRA to the 400ha compensation site habitat available.

Historic England:

- While there is much in this policy that they support, they are concerned that Tipner West is almost entirely covered by a proposed area of opportunity for tall buildings, via PLP1. They assert that it is inappropriate to plan for tall buildings across the whole of Tipner

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

- Furthermore, neither the policy nor the supporting text requires a heritage statement (i.e. heritage impact assessment). They suggest a new line is added to paragraph 4.25 to address this concern.
- Hydrodynamic modelling is needed, noting that any increase in land mass through reclamation and/or any associated flood defence measures or dredging has the potential to cause funnelling of water that results in a scouring effect on the designated D-Day Slipways. They suggest an amended policy criterion that would address this point.
- The policy and hence Plan is therefore UNSOUND and changes are required to both PLP1 and PLP3 (2)(b) to overcome the concerns around a site-wide tall buildings policy and specifically addresses implications for Portchester Castle and separate implications for the D-Day slipways.
- The following modifications are requested:
  To split PLP3(b) into two parts:
  PLP3 '(b) Break down the barriers, both physical and perceived, created by the M275 motorway and Portsbridge Creek. This will be achieved though the design of both buildings and spaces to create excellent connections with new development at Tipner East and the wider area.
  (c) The design, scale and massing of the scheme needs to respond sensitively to the significance of Portchester Castle including its setting, taking into account its dominance in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance.'
  Add an additional criterion: '(o) Future development of the site will require land raising and construction of flood defences. Their implementation should be informed by the SFRA Level 1 and 2 and hydrodynamic modelling to ensure changes in water flow do not result in scouring of the Scheduled slipways.'
  Paragraph 4.25 (second half of this paragraph, which we suggest becomes an independent new paragraph):
  'The Scheduled Portchester Castle is located approximately one mile to the north west of Tipner peninsula, across the open water of Portsmouth Harbour. Any development proposals for the site should also seek to understand the significance of the Castle and its setting, and ~~where possible~~ respond to the presence of the asset in terms of impact on views both from, and towards the Castle. This needs to be assessed through heritage impact assessment.'

- **National Highways** note that the site allocation includes a requirement for a bridge for sustainable travel modes only between Tipner West and Horsea Island and that it should be ensured that a Transport Assessment adequately assesses the traffic implications on the Strategic Road Network (SRN) as a result. PLP3 reiterates that the provision of the bridge is a key requirement for the site allocation to be successful and avoid additional traffic on the SRN. Due to the funding/delivery uncertainties (as set out in the Tipner-Horsea Bridge Transport Position Paper), it is essential that any Transport Assessment to support a future planning application will assess what the impact on the SRN would be with and without the bridge in place.
- **PCC LHA** support the vision for Tipner West/ Horsea Island East set out in paragraph 4.17, and in particular the vision for this to be a community that makes fewer journeys by car, and provides a new gateway into the City. Page 16 of the Portsmouth Transport

Strategy also notes aspirations for low car/ car free development at these strategic sites. They support Policy PLP3, and in particular the elements relating to transport (paragraphs 2.b)h)I)j)k) and paragraph 4). Regarding paragraph 2.c) (A bridge between Tipner West and Horsea Island East for the use of sustainable transport modes only) the LHA considers this to be a piece of critical infrastructure.

- **Fareham Borough Council** note that any development of the site should have regard to the setting significance of Portchester Castle.
- **Hampshire County Council Minerals and Waste Planning Authority (HCC MWPA)** remind PCC to have regard to the Hampshire Minerals and Waste Plan sites and include some wording to this effect in the policy to ensure it is sound. Without such wording there is a risk that the policy would not be effective in safeguarding operational waste sites and wharves. The policy should include the following suggested wording: 'A Safeguarded Infrastructure Assessment will be required to be submitted, in support of a future planning application. This should have regard to the minerals and waste infrastructure, safeguarded under the currently adopted Hampshire Minerals and Waste Plan (2013) (HMWP)'. The assessment should provide sufficient evidence to satisfy the requirements of Policies 16, 26, and 34 of the HMWP. Wherever possible, site operator comments should be sought and included in the assessment, particularly, where mitigation measures are being proposed by the applicant. Consultation with the MWPA is recommended at the earliest stage of and throughout the planning process. The Council will need to ensure that it is satisfied that alternative waste management capacity can be provided should this be proposed for removal from the Tipner site. With regards to the safeguarded Tipner Range site, PCC should ensure that the marine hub portion of the proposed development has the capacity to function as a minerals and waste wharf, which would satisfy the safeguarding requirements. If this is not part of the final design, consideration will need to be given to possible alternative locations for wharf capacity.
- **HCC MWPA** highlight that the proposed strategic site allocation falls within the buffer zones of Paulsgrove Household Waste Recycling Centre, operated by Veolia Environmental Services (UK) Plc, and Tipner Waste Transfer Station, operated by T J Waste & Recycling Ltd. Both waste sites are safeguarded under Policy 26: Safeguarding waste infrastructure. Tipner Range is safeguarded as an area of potential wharf usage close to Portsmouth Naval Base (including Whale Island) and opposite another safeguarded site in Gosport Borough on the opposite side of the harbour. There has been a steady decline in wharf capacity.
- **HCC MWPA** note that table 1 of the Tipner West topic paper, reports that the land occupied by the safeguarded Tipner Waste Transfer Station was acquired by Portsmouth City Council in January 2024. However, there is no mention of the other safeguarded sites identified in the HMWP that might be impacted by PLP3.
- **HCC** support this housing and employment site allocation and policy requirement for a new public transport and active travel modes bridge to link the two parts of the site between Tipner West and Horsea Island East as there is opportunity for this new bridge and segregated bus way to play a significant role in improving the sustainable travel connectivity by bus and cycle from the Fareham residential areas of Portchester.
- **HCC** recommend that an additional (minor) modification is made to policy (2.i)) to include pedestrian and cycle provision linking Port Solent and Tipner to Southampton Road (A27 corridor), which improves the opportunities for sustainable travel north of the city and from Fareham into Portsmouth. This would then align with the sustainable / active travel infrastructure requirements as set out in the City Council's Infrastructure Delivery Plan

and also would be in accordance with LTP4 and adopted Local Cycling and Walking Infrastructure Plans.

- **Southern Water** provide title information demonstrating their land ownership within Tipner West & Horsea Island site allocation.

A3.33 The following main issues were raised by general and other consultation bodies on Policy PLP3: Tipner West & Horsea Island East:

RSPB:

- Comment that the policy is not legally compliant, not sound and not compliant with the Duty to Cooperate.
- The type of development proposed does not justify damage to the integrity of the internationally important wildlife sites.
- The RSPB has engaged closely with proposals for Tipner West since the 'super peninsula' proposals were first consulted on in 2019 and more recently as a guest member of the Tipner West Regulatory Panel. They welcome the Council's decision to drop the 'super peninsula' proposal and commend its recognition of the ecological sensitivities of the site. There had been over 9,000 objections to the Regulation 18 Consultation on the 'super peninsula'.
- The RSPB has gone to great lengths to encourage the Council to select a design option that would not lead to adverse effects on the integrity of the designated sites, including sharing an illustrative 'nature positive' design option (HRA 8.72-73) which could deliver the original desired housing numbers (through gentle densification) and the marine hub.
- The RSPB/HIWWT's illustrative vision was based on parameters of 1,250 homes and a proportion of marine employment development on Horsea Island East (circa 23,000sqm). At the time of sharing the illustrative proposal, there was no information shared with the Regulatory Panel about the scale of land-take of the protected sites now predicted to be necessary for the marine hub and dredging, with the full 58,000sqm now being consolidated on TW landmass.
- It is greatly disappointing that the change in project parameters ruled out the 'nature positive' option in favour of Options A or B, resulting in loss of 2.1-6.5ha of protected site habitat plus loss of, and harm to, functionally linked habitat. Yet even the Council's site promoter team's optioneering process appears to result in schemes that remain substantially financially unviable.
- They have serious doubts as to whether all less damaging options have been explored to adequately meet the HRA tests.
- There remain questions as to the financial viability of the scheme in this location and whether these can be overcome at all. This raises questions regarding the soundness of the Plan which relies on Tipner West to deliver a large proportion of Portsmouth's employment needs.

<u>Potential adverse effects</u>

- They agree with the overarching conclusions of the Appropriate Assessment section of the HRA that adverse effects cannot be ruled out in respect of Policy PLP3, and that the 'derogation tests' (set out under regulations 107 & 109, the Habitats Regulations, with respect to land use plans) must therefore, be satisfied if the draft Plan is to proceed to adoption.
- They do not consider that the HRA has adequately assessed the scale and precise nature of the potential impacts to the protected sites and their designated species/features. Therefore, they consider it does not follow Government guidance to

'…use the best available objective and scientific information to make confident decisions…' (Defra, 2023: Habitat Regulations assessments: protecting a European site).

- The HRA presents a surprisingly superficial impact assessment which fails to quantify the identified or potential adverse effects to the integrity of the SPAs/Ramsar sites beyond a simple calculation of area of direct habitat loss. Critically, it fails to assess the functional role of the habitat that would be lost in a species and ecosystem context i.e. understanding how the SPA/Ramsar species utilise these areas and therefore, their importance spatially and temporally (nor the importance of the functionally linked habitats as mentioned above and below).
- No consideration appears to have been given to the present condition of the site or the areas that would be lost. The assessment also fails to consider the potential relationship of the lost habitats to species populations that form part of the adjacent SPA/Ramsar site populations (e.g. Chichester & Langstone Harbours SPA/Ramsar site to the east and the Solent & Southampton Water SPA/Ramsar site to the west), and therefore, determine whether adverse effects may occur in respect additional sites beyond the Portsmouth Harbour SPA/Ramsar site.
- The HRA assumes that it should be possible to fully mitigate all other impacts (with the possible exception of hydro-geomorphological impacts as a result of the reclamation of SPA/Ramsar site habitats linked to the marine employment development (HRA para 6.170) and impacts of tall buildings/structure on bird flight/sight-lines) at the application stage (HRA paras 6.138-6.151). RSPB are less confident that this will prove to be the case, but accept that detailed application-level assessment will be required to fully quantify the residual effects (following mitigation) from these additional impact pathways.
- The HRA's approach to the loss of SPA functionally linked land (i.e. Solent Wader and Brent Goose Sites) within or adjacent to the Tipner West allocation site is inadequate to rule out further adverse effects at the plan stage and no mitigation details are provided as such details are advised to be 'commercially confidential'. Therefore, no independent assessment can be made of the suitability/deliverability of such mitigation.
- Loss or damage to the 'Core Areas' of functionally linked land must be considered in the same way as direct damage to the SPAs/Ramsar sites themselves, and therefore, must be considered as part of the derogation case. Despite this, we can find no assessment of the likely impacts to Core Area P75 from the Tipner West allocation, only passing reference to it, which further increases RSPB's concerns of inadequate assessment of the adverse effects.

<u>Derogation Tests</u>

- Without a proper account of the full nature and extent of adverse effects, RSPB do not consider that the derogation case can be practically or lawfully considered.
- While they accept that some finer detail may not be available at the plan stage, the wording of the derogation tests for local plans (Regulations 107 & 109) do not differ from that of the general derogation tests of other plans and projects (Regulations 64 & 68), therefore, it is clear that each of the three tests must be satisfied in full, based on the best available information. There is EU Guidance on Managing Natura 2000 Sites which emphasises, in reference to an ECJ decision (C-304/05, para.83) that the derogation tests can only be satisfied where the damage to the site has been '*precisely identified*.' The derogation tests place an extremely high bar for justification of exception cases. Whilst we accept some finer detail may not be available at the Plan stage, the wording of the derogation tests remains the same for both Regulations 107/109 (Plan) and 64/68 (project) levels.

- The HRA takes a disaggregated approach to the alternative solutions test, by considering the alternatives to individual elements of the current preferred design options for the Tipner West regeneration scheme. While some breakdown of the key elements of the draft allocation is (or could be – see our further comments below) helpful for the purpose of the alternative solutions assessment, many of the individual elements currently assessed for their alternatives would not logically come forward in isolation (HRA paragraph 8.14), nor would they individually meet the same specified overarching need. RSPB also note that some of the elements subject to alternative solutions assessment (e.g. site decontamination) would not on their own lead to adverse effects on the protected sites, therefore, the value of including them is unclear.
- The marine hub is highlighted in the HRA (8.9) as the main cause of the financial deficit common (to a lesser or greater degree) to all of the options considered to-date by the Council for delivering the project objectives at Tipner West. This is because the marine hub severely limits the available area of the site for higher value development, such as residential which is critical to the viability of the project given its significant flood risk and contamination challenges. Therefore, it seems highly important that significant scrutiny should be placed on the marine employment hub in the alternative solutions assessment as this appears to be the main cause of the resulting damage to the protected sites. The options with lower financial deficit appear to be generally dependent upon more damage to protected sites.
- The marine hub has previously been estimated by the Council to further increase housing need in Portsmouth City by around 1,000 homes due to the need for the relocation of marine industry skilled workers from elsewhere in the country, thereby itself adding to wider housing pressures in the City; although RSPB can find no recent mention of this important point in the HRA or other background documents to the draft Plan
- There are therefore, fundamental questions around the viability testing done with regard to alternative marine hub sites. Many of the alternative Solent sites compared unfavourably to Tipner West when assessed against the original 9ha area allocated to deliver the desired 58,000sqm employment development (see summary in HRA Table 5, p108), but that area now appears to have reduced to just 4.9ha, which could bring a number of less damaging sites back into the running as less damaging alternative solutions.
- The new information indicating that the creation of deep-water full-tide access to the marine hub at Tipner West will result in 2.1ha of intertidal loss due to dredging should also now be factored into the comparison of the deep-water access at the other sites previously ruled out.
- The last marine hub alternatives study was in 2020 and should be reviewed as the conclusions might be very different with new project parameters.
- The Council's alternative solutions assessment fails to thoroughly consider a number of additional issues that could also represent less damaging solutions, if not entirely remove adverse effects. These include:
    - Alternative means of delivering the project objective e.g. modifications to existing marine employment sites in the region;
    - Alternative design options for the marine hub (such as a suspended wharf extension) and bridge (such as a single-span design) that would avoid or reduce direct loss of SPA/Ramsar habitats;
    - Alternatives to providing full tide deep water access (i.e. consideration of less damaging dredging regimes);

  - Alternative options for enabling development or other funding streams to support the delivery of the marine hub or other project elements (e.g. getting a delivery partner onboard to support financing the marine hub; or alternatives land uses for the now redundant Horsea Island site, such as delivery of Biodiversity Net Gain for other local developments);
  - Delivery of the proposals across more than one site (e.g. delivery of parts of the marine employment at an alternative site/s or delivering the enabling housing on an alternative site/s within or outside the local authority), which does not appear to have been thoroughly assessed.
- It is important that all less damaging options are considered regardless of their potential increased economic costs, which would be in line with EU Guidance (C-399/14, para 77). Therefore, alternative design options that may have previously been ruled out on economic grounds should be included in the presentation of alternative solutions. Alternatives cannot not be examined simply because they 'cost too much' (Managing Natura Sites, 2000, para 5.3.1).
- The alternative solutions assessment must take both a broader and deeper look at the full range of options for delivery of the overarching project objectives.
- While we appreciate that flood risk and contamination leachate risk are compelling drivers for the Council in support of regeneration of the Tipner West site (although RSPB would question the scale and imminency of each of the risks, and strongly disagree that upgraded coastal defences are necessary to prevent loss of the protected areas from erosion (HRA para 8.80)), there are plainly other land-use options (such as a wholly residential development or other form of mixed use development) that would equally address these needs and avoid adverse effects on the protected sites. Indeed, these needs (flood risk and contamination risk) are not uncommon to other brownfield sites fringing the Solent SPAs/Ramsar sites, where options have been secured or are proposed to address them that do not entail adverse effects to the protected sites. As such, RSPB consider these aspects could and should be ruled out at the alternative solutions assessment stage.
- They would strongly argue that the third issue – creation of a marine hub for the Solent – is the only matter that is relevant to the IROPI assessment. The other two issues are merely secondary benefits to any large-scale regeneration scheme at Tipner West, for which less damaging alternatives exist. This is consistent with the supporting text for draft Policy PLP3 which twice states that 'the principal driver behind this allocation is the creation of a new marine hub' (HRA paragraphs 4.16 & 4.20).
- The evidence base used to support the case for the marine hub may no longer be valid, particularly following widespread economic and societal changes as a result of the global Covid pandemic and the UK's departure from the European Union. Market conditions may have changed significantly. Great weight is attached to reports from 2015-2020 and the City Deal was 2013. RSPB consider it essential that the Council provides an updated analysis of the need for the form of marine employment hub identified as required to meet the project objectives (and, following which, a reassessment of the possible alternative locations in the region that can meet those objectives).
- It is difficult to discern an imperative or overriding public need that the marine hub would fulfil, or indeed the exceptional problem that the marine hub would solve. Instead, the marine hub is frequently referred to as an "opportunity" (HRA paragraphs 8.37 & 8.93; Plan paragraph 4.7) which does not in RSPB's view translate to being 'imperative' public need.
- While RSPB accept that the development may lead to modest job creation, other claimed benefits such as meeting local housing need (HRA paragraph 8.37), protecting local

properties from coastal flooding and even protecting the SPA/Ramsar sites from flooding and contamination are either unsupported (such as meeting local housing need, which we understand would actually be increased by the marine hub) or are not uniquely dependent on the delivery of the marine hub.

- The failure to properly assess the functional role of the habitat that would be lost in a species and ecosystem context (as well as the full range of potential adverse effects as yet without clear mitigation identified) has resulted in the deeply flawed approach to the weighing up of the perceived public interests of the Tipner West proposals against the percentage area of loss of the overall Portsmouth Harbour SPA and Ramsar site (HRA paragraphs 8.123-8.128 – The Overriding Balance). Whilst it is acknowledged in the HRA (8.126) that the terrestrial SPA/Ramsar is the largest area of terrestrial habitat within the SPA/Ramsar boundary, the HRA only proceeds to consider this in the context of the network of functionally linked land outside the protected sites, which clearly do not possess the same level of protection nor are they referenced in the SPA conservation objectives.
- Whilst the total figure of potentially available habitat (c400ha – HRA paragraph 8.135) sounds impressive, without any further information concerning at least broad locations, individual site size, potential ecological functionality, current status and condition, cost etc., it is difficult to see how it can be concluded that acceptable compensatory measures can be secured in respect of draft Policy PLP3. Such sites may even not be available now or in the near future unless secured early enough. Many such sites are sought by other plans and projects for mitigation/compensation purposes.
- The promoter team do not appear to have undertaken (or at least have not shared) any detailed assessment of the ecological function of the habitat that is predicted to be lost, nor of the potential additional effects of the loss of or damage to SPA functionally linked land (i.e. Solent Wader and Brent Goose sites) that could arise from the Tipner West policy. Therefore, the basic objectives, target features, ecological processes and functions to be compensated remain unclear. Section 6 of the Government's Derogation notice form should be completed in this regard.
- They have serious concerns about the suitability of using the SPA compensation metric used by Portsmouth City Council to calculate the necessary compensation (highlighted in HRA paragraph 8.138). RSPB have advised the Council that the metric itself is seriously flawed (mathematically and ecologically) and therefore, cannot in their view be relied on to determine the necessary type and area of compensation required. RSPB were given repeated assurances from the Council that it would only be used for the purposes of options appraisal alongside professional ecological judgement, yet it nevertheless appears to continue to be relied upon as the primary means of calculating compensation requirements in the HRA.
- There are further errors they have previously highlighted to the Council in terms of the information and assumptions that have been fed into the metric that also appear to have been repeated here, such as assigning all SPA habitats to ‘good’ condition, which does not reflect the ecological reality on the ground.
- They consider no confidence can be placed in the HRA's conclusions on securing compensation and strongly disagree with the Council’s view that further details of the compensation can be deferred to be considered as part of the future planning application.

Conclusion

The Portsmouth Pre-Submission Draft Plan is not legally compliant because the Habitats Regulations have not been correctly applied in respect of the following:

1. Insufficient assessment to identify the scale and precise nature of the adverse effects of draft Policy PLP3 on the integrity of the SPAs/Ramsar sites (i.e. Regulation 105(1)) against which to assess the further derogation tests; and
2. Flaws, gaps and errors in the derogation case (i.e. Regulations 107(1) & 109), namely:
    i. Alternative solutions – inadequate and outdated assessment of potentially less damaging alternatives to deliver the public interest the allocation seeks to provide,
    ii. IROPI – insufficient up-to-date evidence to demonstrate an imperative or over-riding public need for the development,
    iii. Compensation – insufficient evidence to demonstrate that suitable compensatory habitat can be secured/delivered.

- Furthermore, the draft Plan is, in RSPB's view, unsound under the National Planning Policy Framework because it is not 'justified' or likely to be 'effective' for the reasons stated. The lack of legal and financial security of the proposals renders deliverability of the policy in serious doubt.
- They question if the Duty to Cooperate has been met with regard to delivering enabling housing in one or more neighbouring authorities.
- An unmodified policy PLP3 could irreversibly damage the Portsmouth Harbour SPA and Ramsar sites and would be contrary to the Council's duties under the Environment Act.

<u>Proposed Modifications</u>
Policy PLP3 would need to be modified in one or more of the following ways:

- Reduce the housing range to levels that can be accommodated within the allocation site without encroachment onto the SPA/Ramsar sites;
- Increase housing densities to allow delivery of optimum dwellings while avoiding encroachment onto the SPA/Ramsar sites;
- Reduce the area of the marine employment development to allow regeneration of the site without encroachment onto the SPA/Ramsar sites;
- Relocate part of the housing and/or marine employment development to Horsea Island East to avoid/reduce encroachment onto the SPA/Ramsar sites (as per the original City Deal proposals);
- Remove all references from the policy which suggest the acceptability of direct loss or damage to SPA/Ramsar habitats e.g. 2.g).

- Given that a substantial funding deficit already exists in the current preferred options, RSPB do not consider that this should be a reason not to modify the policy in order to deliver a scheme that is within the environmental limits of the allocation site and in full compliance with the Habitats Regulations.
- In a separate representation, the RSPB raised concerns regarding the policy wording associated with the protection of Solent Wader and Brent Goose Strategy (SWBGS) sites; these are sites beyond the boundary of the Solent Special Protection Areas (SPAs) that provide a supportive function for populations of species for which the sites are designated.
- The RSPB stated that the Draft Plan has identified that Tipner West & Horsea Island East has sites of functionally linked land, mapped within the SWBGS, within or in close proximity to the allocation. It is therefore, important that Policy PLP3 appropriately

reflects the agreed approach set out in PLP42 and the SWBGS in order to ensure no adverse effects on the integrity of the associated SPAs.

- The SWBGS sites identified within or in close proximity to Tipner West & Horsea Island East has been evidenced through survey effort over multiple years to inform the SWBGS. It is important to note, however, that the use of sites fluctuates particularly with the size of the Solent population of Brent Geese. In certain winters the number of juvenile Brent Geese can be relatively low and therefore, recent surveys may not be representative of site usage by the geese in more productive years. The use of sites will also vary if the land use or management changes and recreational disturbance.
- The SWBGS Mitigation Guidance (SWBGS Steering Group, 2019) document outlines that should site classification, and therefore, its function as supporting habitat to the SPA, could be disputed, reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period.
- In addition to the above, the SWBGS Mitigation Guidance provides additional wording around 'Candidate Sites', which have records of large numbers of waders or Brent Geese but have been recorded less than three times from 2006/2007 to present day. Therefore, in the particular case of Candidate Sites, further surveys are necessary to determine the classification of the site. Upon survey effort, it is likely that these sites will fall into the higher use categories, for example 'Core Area', 'Primary Support Area' and 'Secondary Support Area'. For some sites, where there has only been one survey to date, two years of data may be necessary.
- The RSPB has underlined the key sections of each strategic site's policy wording which they do not consider appropriate. The SWBGS sites within or in close proximity to Tipner West & Horsea Island East have been well-evidenced through survey efforts as part of the original SWBGS survey, alongside an updated movement study, and ad-hoc additional records submitted (Whitfield, 2020). Therefore, the RSPB considers that these sites are already confirmed as areas of significant supporting habitat. If a development applicant for these strategic sites disputes these classifications, then reclassification should only be considered if confirmed by three consecutive years of survey to the agreed methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period.
- The RSPB state that instead of effectively inviting developers to challenge the importance of sites forming part of the network of SWBGS sites, it would be far better to require applicants to gather further records of site usage by Brent Geese and/or waders (ideally two survey seasons under 6 suitable habitat management conditions) to inform any necessary mitigation and/or avoidance measures.
- As currently worded, the RSPB consider the policy approach of the strategic sites identified as including or lying within close proximity of SPA functionally linked sites identified within the SWBGS including Tipner West & Horsea Island East is misleading or contains omissions that do not reflect the guidance of the SWBGS and accordingly PLP42. The RSPB therefore, does not consider these policies adequately provide the required level of protection that should be afforded to SPA functionally linked land and therefore, is contrary to the Habitats Regulations.
- The RSPB consider that in order for policy relating to SWBGS sites to grant the right level of protection afforded to functionally linked land to the Solent SPAs, and therefore, fully consider and adhere to the requirements of the Habitats Regulations, changes must be made in the wording relating to PLP3. Until such changes are made, the RSPB does not consider the Draft Plan to be legally compliant or sound.

- The RSPB suggest the following changes to paragraph 4.36: 'Non-breeding bird surveys between October and March (typically two survey seasons under suitable habitat management conditions) will be required to inform the detailed design of the offsetting mitigation habitat that will be provided to ensure no adverse effect on integrity.'

Hampshire & Isle of Wight Wildlife Trust (HIWWT):

- They strongly object to the current content of Strategic Site Allocation Policy PLP3: Tipner West & Horsea Island East
- The Council's abandonment of the 'super-peninsula' proposal was a positive step. However, the new plans for the site still involve substantial loss of protected land. The draft allocation for Tipner West, as set out in the Pre-Submission draft plan, would lead to the direct and permanent loss of between 2.1 and 6.5 hectares of the protected sites, including Portsmouth Harbour SPA and Ramsar site. This is in addition to the indirect effects and loss of functionally linked habitat, including essential feeding and roosting areas for the protected populations of wintering waterbirds such as Brent Geese and Black-tailed Godwits.
- This proposal risks establishing a gravely damaging precedent for delivering local development needs at the expense of nationally and internationally important wildlife assets across the UK. The development does not justify compromising the integrity of the globally significant wildlife habitats.
- HIWWT are, however, disappointed that the Council changed the project parameters (most notably the decision to consolidate the entire development onto the Tipner West site) and ruled out the RSPB/HIWWT 'nature positive' option on financial and operational viability grounds (HRA para 8.73).
- They believe the Council's justification (as legally required for this scale of harm) that there are no less damaging alternatives and 'imperative reasons of overriding public interest' is flawed, and risks rendering the Local Plan both unsound and non-compliant with legal protections. Furthermore, the Council's proposals for Tipner West clearly conflict with the legal goals set out in the Environment Act, whose targets and enhanced duties require public bodies to further biodiversity protection and recovery. The proposed development would result in significant habitat loss and degrade vital ecosystems that support both wildlife and climate resilience.
- They agree with the assessment that both remaining development options for Tipner West would have a negative impact on the integrity of the SPA/Ramsar sites, simply due to the magnitude of the anticipated immediate loss of the protected areas. We agree, therefore, with the general conclusion of the HRA's Appropriate Assessment section that, regarding Policy PLP3, adverse effects cannot be completely eliminated and that, in order for the draft Plan to move forward with adoption, the "derogation tests" (outlined in regulations 107 & 109 regarding land use plans) must be passed.
- They do not believe that the Appropriate Assessment has sufficiently evaluated the scope and specific character of the derogation tests.
- The Appropriate Assessment only provides a cursory impact assessment that does not go beyond calculating the area of habitat loss to determine the extent of the damage. The failure to evaluate the functional significance of the habitat - that would be lost in the context of species and ecosystems - is particularly problematic, as it obscures the importance of these places both temporally and spatially to Ramsar and SPA species. Additionally, it disregards the possibility that species populations of nearby SPA/Ramsar site populations may be connected to the impacted areas.

Derogation Tests

- While they recognize that some details may be lacking at the plan stage, the wording of the derogation tests for local plans (Regulations 107 & 109) is consistent with those for other plans and projects (Regulations 64 & 68). Thus, each of the three tests must be fully satisfied based on the best available information. Without a thorough account of adverse effects, the derogation case cannot be lawfully considered. There are significant flaws in the Council's Derogation case. The derogation tests set a high bar for justifying exceptions, for only the most indispensable projects (based on social or economic public interest).

Alternative Solutions

- The HRA assessed the individual elements of the Tipner West regeneration scheme. Whilst subdividing can aid the alternatives assessment, this method is counterproductive for identifying broader alternative solutions for the overall project objective. The HRA acknowledges that this approach is highly theoretical (8.14) as some elements would not logically proceed in isolation or meet the overarching need individually. Indeed some elements (e.g. Contamination) do not independently cause adverse effects. By not considering the scheme holistically, HIWWT believe the Council's alternatives test overlooks key less damaging solutions, such as:
    1. Alternative sites for the project, potentially across multiple locations.
    2. Modifications to existing marine employment sites in the region.
    3. Design options for Tipner West that minimize habitat loss but were dismissed on viability grounds.
    4. Alternative funding or development options to support the marine hub or other project elements.

IROPI

- While the first two issues (flood risk and contamination leachate risk) are compelling drivers for the Council's support of Tipner West's regeneration, their scale and urgency are debatable. Moreover, alternative land-use options, such as purely residential or other mixed-use developments, could address these risks without harming protected sites. Similar risks at other Solent brownfield sites have been managed without adverse effects on protected areas.
- They argue that only the third issue - the creation of a marine hub for the Solent - is relevant to the IROPI assessment. The other two concerns are secondary benefits of any large-scale regeneration at Tipner West. This aligns with the supporting text of draft Policy PLP3, which emphasizes that 'the principal driver behind this allocation is the creation of a new marine hub' (HRA paras 4.16 & 4.20).
- The evidence supporting this component of the development may be outdated, especially in light of economic and societal shifts post-Covid. Furthermore, HIWWT struggle to identify the imperative and overriding public need that the marine hub would fulfil or any exceptional problem it would solve. The hub is described as an 'opportunity' (para 4.7 draft PLP) with the risk being missed 'growth potential' or compromised 'inward investment' which are not considered to constitute an essential justified or urgent need.
- There does not appear to be any assessment weighing the wider conservation importance of the protected sites against the proposed public need.

Compensation

- While the total amount of potentially available habitat may seem significant, without specific details on locations, site sizes, ecological functionality, current status, condition,

and cost, it is difficult to conclude that the compensatory measures for Policy PLP3 would be adequate. Given ongoing efforts to secure mitigation and compensation land for other Solent projects, there is a strong risk that the identified sites may not be available when needed.

- The full scope of adverse effects requiring compensation has not been determined. Despite significant ecological data collection, the promoter team has not shared an assessment of the ecological function of the habitat expected to be lost, nor have they evaluated the potential indirect and cumulative effects from the Tipner West scheme and nearby developments in the draft Plan. As a result, the objectives, target features (affected habitats and species), and the ecological processes needing compensation remain unclear.
- HIWWT have repeatedly expressed concerns about the SPA compensation metric used by Portsmouth City Council, which we believe is fundamentally flawed both mathematically and ecologically. Despite assurances that it would only be used for options appraisal, it continues to be relied upon in the HRA as the primary method for calculating compensation requirements. Further errors persist, such as the assumption that all SPA habitats are in "good" condition, which misrepresents the ecological reality and artificially lowers the calculated compensation needs.
- Given these issues, HIWWT have no confidence in the draft HRA's compensation figures and strongly disagree with the Council's stance that further details can be deferred to a future planning application.
- The Pre-Submission Draft Plan proposals are not legally compliant because the Habitats Regulations have not been correctly applied in the following areas:
    - Assessment of Adverse Effects: There has been insufficient assessment to accurately determine the scale and nature of the adverse effects of draft Policy PLP3 on the integrity of the SPAs/Ramsar sites (Regulation 105(1)), which is necessary to evaluate the subsequent derogation tests.
    - Derogation Tests (Regulations 107(1) & 109):
        - o Alternatives: The assessment of potentially less damaging alternatives to achieve the project objective is inadequate.
        - o IROPI: There is insufficient evidence of an imperative or overriding public need for the development.
        - o Compensation: There is a lack of evidence to demonstrate that suitable compensatory habitat can be secured or delivered.
- They consider the Draft Plan to be unsound under the National Planning Policy Framework (Para 35(b) 'justified'), as Draft Policy PLP3 does not present an appropriate strategy for this key development site and fails to consider all reasonable alternatives for its regeneration that would meet local development needs. If policy PLP3 proceeds without modification a dangerous precedent would be set, causing irreversible damage to the protected sites and weakening the interpretation of the Habitats Regulations (particularly the Derogation tests) across the UK. The policy would go against the Environment Act legal duty and also release carbon contrary to the Council's own nature and climate emergency commitments.
- This is the first time a local plan has tried to make a derogation case which if allowed would cause a 'Portsmouth Precedent', making way for other damaging developments elsewhere.

- **Milton Neighbourhood Forum** expressed concern at the continued negative impacts on coastal wildlife habitat from increases in population which cannot be adequately

remedied through mitigation, being contrary to the UK's Environment Plan of 2018. Tipner West Policy PLP3 is environmentally unsound.

- **Portsmouth Cycle Forum** are pleased to see the proposals for a busway/cycleway and pedestrian bridge reducing travel times for active transport users.
- **The Woodland Trust** support policy criterion PLP3(2) (d, e, f) on habitat restoration and green infrastructure enhancements. Tipner and Horsea Island are high priority for tree planting with low existing coverage. There should be a 15% tree cover target in line with policy PLP41, the national model design code and NPPF paragraph 136.
- **PCC Public Health** indicate that for 1,000 homes and 2 residents per home, a minimum of 2 x 1.65ha public open space should be provided. They question how tightly controlled the provision of compensatory habitat will be. Cumulative effects of biodiversity disturbance must be accounted for, having regard also to Lakeside and Tipner East.
- **Portsmouth International Port** state that it is misleading to refer to the site having deep water access as it is only suitable for small boats, barges and leisure craft currently. Much more depth is required for larger vessels. In addition, it should be made clear that Tipner does not fall within the Freeport tax site or customs zone, although does fall within the wider Freeport Zone. This should be clarified.
- **Coastal Partners** note that although Horsea Island is located within present day Flood Zone 1, it is predicted to move within Flood Zones 2 and 3 over the next 100 years, according to the PfSH Strategic Flood Risk Assessment mapping. They also note that the management policies recommended within the North Solent Shoreline Management Plan, Portsea Island Coastal Strategy Study and Portchester to Emsworth FCERM Strategy do not guarantee the availability of funding required to implement these. This is applicable throughout the Local Plan. A plan should be in place to secure sea defences for the lifetime of the development.

A3.34 The following main issues were raised by **individuals** on Policy PLP3: Tipner West and Horsea Island East:

- This is the first time a local plan has tried to make the case for an exception under the laws that are designed to protect these special areas, allowing irreversible damage to Portsmouth Harbour where nature is already under pressure. People do not want to see the Portsmouth Precedent damaging precious wildlife here and paving the way for many other damaging developments elsewhere to follow in its footsteps.
- The Council must step up and fulfil their biodiversity duties by finding a sustainable solution for Tipner West, delivering a regeneration scheme that Portsmouth can be proud of. That means keeping the development within the ecological limits of the site and not building on vital habitats that are relied on by special wildlife, that also help reduce carbon emissions and that are valued and enjoyed by the community.
- This is an SSSI site and of great importance to us here in the City. An important habitat for lots of endangered and other species. This goes against the declaration of climate and nature emergency we declared here in Portsmouth in 2019 and 2022. This cannot contribute 30% of land to be left for nature, which is legally binding. Portsmouth is the most densely populated city, has high air and water pollution. As noted on the BBC recently, Portsmouth is the 3rd worst polluted city in the country. We have very few green spaces and tree coverage.
- This allocation has been focussed on the conflicting priorities between maximising new development and protecting important natural habitats. It seems to have become 'a numbers game'. In order to resolve the complex balance between the two priorities it is

suggested that a draft masterplan be prepared to demonstrate possible options. The masterplan also needs to be about creating a sense of place and identity for this new neighbourhood. It should not just be a dormitory suburb to make up the numbers of the government quota. It has the potential to become a distinctive neighbourhood which is attractive and sustainable in itself. It should make the most of its prominent estuary location with a distinctive architectural feature at Tipner Point (such as a business office tower) and a harbour-side promenade along the bay to the north west. The southern end could remain as natural habitat which is cheaper and more sustainable than trying to create new ones [a rough sketch plan was provided].

- New industry could be allocated next to the Tipner Point feature building. Housing could be in five phases, Tipner East, Tipner West, south-east Horsea Island and four and five being the MOD site. The latter two would be accessed via a bridge across Tipner Creek which would also serve to connect to Port Solent via a local bus service only route as previously proposed. A new road along the southern edge of Horsea Island could serve a long frontage of new housing and a marina facing south across the harbour. Phases four and five would be an 'enabling project' of profitable marina housing to help pay for the bridge. Without a major profitable element, it is unlikely that the bridge will ever be built which would be a strategic failure. The MOD use should be transferred elsewhere before 2040, as it is precluding essential development. This should be indicated in the Local Plan.
- Refers to the recent published comments of Councillor Hugh Mason who said that he has no objection to mandatory housing targets in principle but that they must take into account the constrained island geography of Portsmouth rather than just the predicted increase in population and he suggested that a target of about 13,000 homes rather than the 17,000 previously proposed, would be achievable. But he did not refer to the major constraints of the impact on nature and birdlife of the Tipner West allocation of between 814 and 1250 homes and 58,000 sqm of marine employment space.
- There have now been strong objections to the Plan expressed by the HIWWT and RSPB who warn that the proposed development at Tipner West could cause significant harm to Portsmouth's internationally important wildlife sites and set a damaging precedent nationally, undermine the Environment Act's target to halve nature's decline and also fail to support the Council's strengthened biodiversity duties. They say that 'nature has a tipping point and we cannot afford a precedent at Tipner that tips us over the edge'. In reply, the Council spokesperson said that the site is unique with complex constraints and warned of widespread flooding if the project does not go ahead which will also seep into the harbour to the detriment of the marine ecology. Also, it would prevent the future development of housing and marine jobs for the City. He added that the plans could be supported by an IROPI assessment of imperative reasons for overriding issues of public importance.
- There is clearly a fundamental issue about the balance of conflicting priorities between protecting nature and development of local flood protection and provision of housing/ industry. It appears that this has not been addressed in sufficient detail by the Local Plan. It appears that the two sides are still in confrontation and that more should be done to find the best solution rather than continue in dispute. This could possibly be achieved by inclusion of a draft masterplan for the Tipner West allocation demonstrating how the two conflicting priorities can best be balanced by prescribed layout and design. A draft masterplan may need to be produced for the IROPI evidence anyway, at public inquiry stage, to demonstrate how specific design measures can safeguard the environmental protections. The protection of internationally important wildlife habitats must be fully recognised and designed-for in the Plan. The Tipner West allocation is a

nature sensitive location, not just a housing and industry development site. It requires special design preferably in consultation with the nature protection agencies.

- With regard to the high infrastructure costs of this development, such as sea defences. This will probably delay the development by at least 5 years, putting up costs due to inflation even more. The idea of building a bridge across Tipner Creek which would provide a strategic link to Horsea Island and Port Solent is now apparently only an 'aspiration' which may never be economically viable. This is a strategic failure in planning this site and must be properly explained in the Local Plan. Would suggest allowing profitable marina type development on the Horsea side, including development of the MOD site if possible, to provide a major 'enabling' development to help cover the costs of a bridge, hopefully within the time period of the Local Plan, 2040. However, there is another aspect which should be explained in the Local Plan - the loss of a reputed £20 million by PCC by the aborted 'Super-peninsula' proposal. This was a scandalous waste of taxpayer's money due to a colossal error of judgement by the Council in their disregard for the imperative nature conservation protection policies. Not only was it a colossal error of judgement but a reckless expenditure of millions on expensive surveys and specialist staff on a project which was highly controversial and by any objective judgement a 'non-starter'. Numerous letters were written to The News and personal letters to the Council Leader and Deputy pleading for them to do 'due diligence' on the project, but they ignored all advice including the very strong representations from the nature protection agencies and the general public. To spend public money before they had any realistic chance of planning permission, is reckless behaviour and the Council members and officials responsible should be held to account. There was no excuse for this type of arrogant mismanagement. The loss of an estimated £20 million must be explained as part of the historical background of this allocation in the Local Plan. It is a matter of natural justice and it also the affects the whole viability of the development of Tipner West.
- With regard to the new government's 'mutant' algorithm based on local affordability, this would be disastrous for the City and put pressure on increasing the proposed density at Tipner West. The draft Local Plan's indication of between 814 and 1250 new dwellings and 58,000 sq m of marine employment space should be the maximum for this difficult location. The land at Tipner West is unsuitable for over-dense development because it is transitional marshland prone to flooding. Even with new sea walls the land has a high water table and with rising sea levels it is a high risk flood zone where it would be foolhardy to plan an overly dense housing development. Also, it is essential to plan for an attractively designed neighbourhood as an inviting entrance to the City. Colourful waterfront properties with ground floor carports in case of flooding would create a possible waterfront character.
- It is suggested that PCC engage with DIO to allow for potential development of the underutilised Horsea MOD site.
- It is hoped that any masterplan for Tipner West and Horsea Island avoids an excessively dense development just to comply with an unrealistic government target. Portsmouth should be treated as a special case due to its exceptional geographical and ecological restrictions.
- Portsmouth City Council are proposing major developments for this site which is currently an important site for nature. The proposals and the proposed development work and proposed future onsite activities will be detrimental to the future of nature on the site. All of the activities proposed in points a) to f) are major developments which will involve digging and noise; the natural environment will be disturbed and the benefits of the site will be damaged forever. How can the Council even consider this work: it will be

costly as piles will need to be driven into the ground to consolidate the structures proposed.

- The marine hub will ensure that there is much more traffic both on land and at sea, again detrimental for nature.
- Why are there no schools, village hall, café, restaurants specified? They will all need to be built on pile driven platforms. All very costly to carry out. And what will happen as sea levels rise?
- The work needed for a bridge to be built will also be extensive, disruptive and costly. It is difficult to understand how Portsmouth City Council can justify the expense in time, money and resources.
- You say that 'Development proposals for the above-named uses will be permitted provided that they meet all of the following site-specific development requirements'. However, points a)-f) below state the Council's visions of the future rather than providing the checks and balances that need to be put in place to protect the existing natural landscape and currently protected areas.
- What is proposed is aspirational, rather than practical or desirable. The Council need to consider whether points (a) to (f) really enhance life in Portsmouth. The Council will need to take care that buildings do not become the dominant feature. If the Council go ahead with plans on this scale for this piece of prime natural land, will there be any land left for nature? Tipner West would be better saved for nature, a seaside park where people can enjoy the sea air and the sound of the sea.
- Portsmouth already has many features that make it a super City: the town square, and the historic dockyard. For Portsmouth to grow as a super City then this could be achieved by upgrading some existing areas and making local improvements to benefit the community. Developing the seafront site of Tipner West is likely to be costly and disruptive to nature as making the foundations solid enough for the quantity of buildings proposed will be very expensive as you will need to have pile driven platforms created. For these developments, better results would be achieved, with less outgoings, by redeveloping and upgrading other areas within the City.
- Portsmouth City Council must seek advice and work with HIWWT and the RSPB to come up with the best plans and outcomes for wildlife habitats for Tipner West; for the existing protected sites and for the future of this area for nature.
- Dredging will disturb and disrupt the whole of the mudflats ecosystem. As well as causing damage and disruption to the mudflat environment it will release carbon already stored in the mudflats into the atmosphere. Also, if you dredge and intend to dredge ongoing then this will disturb the mudflats and their benefits for wildlife and for carbon capture. Portsmouth suffers from air pollution, so carbon capture and space near the sea also help to mitigate air pollution.
- Having a City where people want to live and is nature friendly is more important than having a super City with people crammed into a space that should have been left for nature to thrive.
- As the stated objective of the Habitat Regulation Assessment (HRA) is to identify any aspects of the Local Plan that would cause likely significant effects on, or adverse effects on the integrity of internationally designated nature conservation sites, the City Council's continued proposal to reclaim an area of the harbour adjacent to Tipner West is clearly contrary to this objective. Disturbing the harbour sediments by building through them would be likely to release historic contamination which would affect wildlife in the harbour. Human health might be at risk if the poison gas test side on the shore is disturbed.

- The proposed new bridge would be unnecessary if the M275 (which is in the City's control) is downgraded to an A road, to which junctions into Tipner West and Horsea Island could be added without the need for a bridge. This would also release land on either side of the downgraded road which could be used to shield the development in both Tipner East and West from traffic noise, pollution and vibration, as well as offering space for a much-needed bus access to east Cosham and Paulsgrove.
- As the Hampshire Buildings Preservation Trust is a member of Tipner Heritage Forum, we asked Cllr Mason on 7 August 2024 for an update on the Council's negotiations with the [former] site owners (John Henry Pounds) about the cleaning and acquisition of their site, whether they will be prosecuted for demolition of the northern most listed historic building; the effect of the fire in the adjacent store - and reports about contamination of the whole site including the poison gas site (documented in the National Archives), the rifle range and the findings of the offshore test rigs into the state of the seabed and how any pollution will be tackled. These requests have not yet been responded to. Farlington Marshes sea wall is vulnerable to rising sea levels, but this is not mentioned in the plan.
- Public bodies, including Portsmouth City Council, have new duties under the Environment Act to take actions to further the protection and recovery of biodiversity. However, the Council's draft policy for Tipner West goes against this legal duty by allowing between 2.1ha and 6.5ha of direct loss of part of Portsmouth's most important area for wildlife (plus additional impacts on surrounding wildlife areas), including vital feeding and roosting areas for wintering waterbirds. These mudflats are also essential for storing carbon and helping us deal with the changing climate.
- The Council's proposed case to the Government that there are absolutely no less damaging "alternative solutions" to delivering the marine hub and housing development at Tipner West is flawed, as is the suggestion that there are "imperative reasons of over-riding public interest" for the development to go ahead that would justify the damage of such an important wildlife site. Therefore, the draft plan fails the soundness test because Policy PLP3 is not justified and does not comply with legislation protecting Portsmouth Harbour or the Council's legal duties to take action to further biodiversity.
- People do not want to see the Portsmouth Precedent damaging precious wildlife in Portsmouth and paving the way for many other damaging developments elsewhere to follow in its footsteps. The Council must step up and fulfil their biodiversity duties by finding a sustainable solution for Tipner West, delivering a regeneration scheme that Portsmouth can be proud of. That means keeping the development within the ecological limits of the site and not building on vital habitats that are relied on by special wildlife, that also help reduce carbon emissions and that are valued and enjoyed by the community.

Strategic Site Allocation Policy PLP3: Tipner West & Horsea Island East - Council response

How the representations have been taken into account:

- Policy PLP3: Tipner West & Horsea Island East from the Portsmouth Pre-Submission Local Plan 2024 has been entirely replaced with a new policy PLP3: Tipner West in the Portsmouth Pre-Submission Local Plan Addendum 2025. Issues raised on this policy have largely been covered by the new policy and are further detailed in the Tipner West Topic Paper (2025).
- A key change in the policy is that development is no longer proposed that would result in damage or losses to the national site network and international habitats designations that cannot be mitigated. The boundary of the site has changed, reducing the areas covered by the policy.
- A statement of common ground has been prepared with the Environment Agency (dated October 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- A statement of common ground has been prepared with National Highways (dated February 2025) to address the issues they have raised.
- A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2024) to address the issues they have raised.
- A statement of common ground has been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.
- A statement of common ground has been prepared with Marine Management Organisation (dated 2024) as a member of the Tipner West Regulatory Panel, but they did not make any representations on the Portsmouth Pre-Submission Local Plan 2024.

Strategic Site Allocation Policy PLP4: Tipner East

	Number of respondents
Total number of respondents	7
Respondents who raised soundness	3
Respondents who raised legal compliance	3
Respondents who raised Duty to Cooperate	2

A3.35 Some respondents are positive about the development of the Tipner East site and some are negative. Those in favour of the development site are particularly supportive of its development as a multi-modal transport hub although would like mention to be included of pedestrian and cycle provision linking Port Solent and Tipner to Southampton Road (A27 corridor). Those against are concerned about the loss of a large area of wildlife habitat. Other environmental concerns mentioned include having a 15% tree canopy target (Woodland Trust) and ensuring the open space provided is sufficient based on the number of dwellings being built. The RSPB also mention the need for surveys of non-breeding birds in the area. Other

comments caution against the risk of flooding and question who will be responsible for operating and maintaining the site.

A3.36 The following main issues were raised by **Portsmouth City Council as the site promoter** for the Transport Hub on Policy PLP4: Tipner East:

- They support the vision for Tipner East particularly the delivery of a new multi-modal transport hub as set out in the Policy D of the Portsmouth Transport Strategy and Policy A of the Portsmouth Parking Strategy.
- This scheme will be essential in provision of large-scale park and ride and other sustainable travel choices into the City for those travelling from outside of Portsea Island. Expanding the Park and Ride, alongside reducing parking provision within the City (through development on some current parking land) will mean that more traffic can be intercepted before it reaches the City Centre, while still ensuring people can get into the City quickly and conveniently. This will both support City Centre regeneration, and efforts to manage growing external traffic demand onto sensitive parts of PCC's highway network; and in supporting modal shift to help address poor air quality in the city centre area.
- They support Policy PLP4, in particular the elements relating to transport (paragraphs 1b, 2b, d, e, f, g, i).
- It should be noted that the requirement for the Tipner Transport Hub scheme is linked to regeneration of the City Centre area and to support development of new activity such as expanded cruise business at Portsmouth International Port as set out in the Portsmouth International Port masterplan.
- Regeneration of the City Centre is expected to increase travel demand into the City and cause changes to land use, including conversion of some existing parking capacity to other uses. The Transport Hub scheme is intended to re-provide this parking capacity at the Tipner site, at the edge of the city, intercepting it and re-moding it to sustainable modes for the 'last mile' in order to reduce the amount of road traffic which enters/passes through the city centre area and the Portsmouth Clean Air Zone.
- The development of the transport hub scheme is also intended to support reduction of private car travel demand to a number of other locations in the City including those already served by Portsmouth Park and Ride, for example, the University of Portsmouth, Gunwharf Quays and Southsea seafront) as well as potential new destinations within the city in future, for example, Fratton Park and Queen Alexandra Hospital.
- It should be noted that it is not possible to support residential parking at the Transport Hub at Tipner from the Tipner East development.

A3.37 No representations were received from the site promoters for the other parcels of land, namely Vivid and Bellway Homes / Homes England.

A3.38 The following main issues were raised by specific consultation bodies on Policy PLP4: Tipner East:

- The **Environment Agency** request a minor modification - table 4.3 specifies the Environment Agency as being responsible for monitoring delivery of the sea defence wall. This is not within their remit, and this should therefore be amended to state that monitoring should be in line with the planning condition/legal agreement (as in table 4.2).
- **Hampshire County Council** as the neighbouring local highway authority ask for a minor modification to include pedestrian and cycle provision linking Port Solent and Tipner to Southampton Road (A27 corridor), which improves the opportunities for sustainable travel north of the City and from Fareham into Portsmouth. This would then align with

the sustainable / active travel infrastructure requirements as set out in the Infrastructure Delivery Plan and also would be in accordance with LTP4 and adopted Local Cycling and Walking Infrastructure Plans.

- **PCC LHA** support this site allocation and policy requirement for a new multi modal transport hub, which includes an expansion of the current park and ride facility. They note that the requirement for the Tipner Transport Hub scheme is linked to regeneration of the City Centre and to support development of new activity such as expanded cruise business at Portsmouth International Port as set out in the Portsmouth International Port Masterplan.
- **PCC LHA** note that it is not possible to support residential parking at the Transport Hub at Tipner from the Tipner East development.

A3.39 The following main issues were raised by general and other consultation bodies on Policy PLP4: Tipner East:

- **Coastal Partners** flag a formatting issue in the paragraph opening for paragraph 4.39. The site is currently located in Flood Zones 2 and 3, but within 100 years it will be entirely in Flood Zone 3. Regarding paragraph 4.42, it will also need to be identified who is responsible for the operation and maintenance of this. It should be stated in the Plan who is responsible for the operation and maintenance of the sea wall.
- **PCC Public Health** note that 2.165 ha of open space should be provided based on 2 residents per home.
- **The Woodland Trust** note that Tipner has tree cover of 10% and is the highest priority for tree planting on the UK Tree Equity Score. Should this site be allocated for development, they recommend adding a 15% tree cover target, in line with policy PLP41, the National Model Design Code and NPPF para 136.
- The **RSPB** raise concerns regarding the policy wording associated with the protection of Solent Wader and Brent Goose Strategy (SWBGS) sites; these are sites beyond the boundary of the Solent Special Protection Areas (SPAs) that provide a supportive function for populations of species for which the sites are designated.
- The **RSPB** state that the Plan has identified that Tipner East has sites of functionally linked land, mapped within the SWBGS, within or in close proximity to the allocation. It is therefore, important that Policy PLP4 appropriately reflects the agreed approach set out in PLP42 and the SWBGS in order to ensure no adverse effects on the integrity of the associated SPAs.
- The **RSPB** note that SWBGS sites identified within or in close proximity to Tipner East has been evidenced through survey effort over multiple years to inform the SWBGS. It is important to note, however, that the use of sites fluctuates particularly with the size of the Solent population of Brent Geese. In certain winters the number of juvenile Brent Geese can be relatively low and therefore, recent surveys may not be representative of site usage by the geese in more productive years. The use of sites will also vary if the land use, management, and/or the level of recreational disturbance changes.
- The **RSPB** note that the SWBGS Mitigation Guidance (SWBGS Steering Group, 2019) document outlines that should site classification, and therefore its function as supporting habitat to the SPA, be disputed, reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period.
- The **RSPB** note the SWBGS Mitigation Guidance provides additional wording around ‘Candidate Sites’, which have records of large numbers of waders or Brent Geese but have been recorded less than three times from 2006/2007 to present day. Therefore, in

the particular case of Candidate Sites, further surveys are necessary to determine the classification of the site. Upon survey effort, it is likely that these sites will fall into the higher use categories, for example 'Core Area', 'Primary Support Area' and 'Secondary Support Area'. For some sites, where there has only been one survey to date, two years of data may be necessary.

- The **RSPB** has underlined the key sections of each strategic site's policy wording which they do not consider appropriate. The SWBGS sites within or in close proximity to Tipner East have been well-evidenced through survey efforts as part of the original SWBGS survey, alongside an updated movement study, and ad-hoc additional records submitted (Whitfield, 2020). Therefore, the RSPB considers that these sites are already confirmed as areas of significant supporting habitat. If a development applicant for these strategic sites disputes these classifications, then reclassification should only be considered if confirmed by three consecutive years of survey to the agreed methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period.
- The **RSPB** state that instead of effectively inviting developers to challenge the importance of sites forming part of the network of SWBGS sites, it would be far better to require applicants to gather further records of site usage by Brent Geese and/or waders (ideally two survey seasons under 6 suitable habitat management conditions) to inform any necessary mitigation and/or avoidance measures.
- As currently worded, the **RSPB** considers the policy approach of the strategic sites identified as including or lying within close proximity of SPA functionally linked sites identified within the SWBGS including Tipner West & Horsea Island East is misleading or contains omissions that do not reflect the guidance of the SWBGS and accordingly PLP42. The RSPB therefore does not consider these policies adequately provide the required level of protection that should be afforded to SPA functionally linked land and therefore is contrary to the Habitats Regulations.
- The **RSPB** considers that in order for policy relating to SWBGS sites to grant the right level of protection afforded to functionally linked land to the Solent SPAs, and therefore, fully consider and adhere to the requirements of the Habitats Regulations, changes must be made in the wording relating to PLP3. Until such changes are made, the RSPB does not consider the Draft Plan to be legally compliant or sound.
- The **RSPB** suggest the following changes to paragraph 4.54: 'Non-breeding bird surveys between October and March (typically two survey seasons under suitable habitat management conditions) will be required to inform the detailed design of the offsetting mitigation habitat that will be provided to ensure no adverse effect on integrity.'
- One individual indicates that the Council's proposed case to go to the Government that there are no less damaging alternative solutions to delivering the marine hub and housing development at Tipner West is flawed, as is the suggestion that there are imperative reasons of over-riding public interest for development to go ahead that would justify the damage of such an important wildlife site. They say for these reasons the Plan is unsound due to not being justified and not legally compliant.

Strategic Site Allocation Policy PLP4: Tipner East - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with PCC promoter and landowner and PCC Transport regarding Tipner East (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared jointly with Bellway and the Homes and Communities Agency regarding Tipner East (dated September 2024). Neither party made representations on the Pre-Submission Local Plan 2024.
- The Council has proposed amendments to table 4.3 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in line with the request from the Environment Agency. A statement of common ground has been prepared with the Environment Agency (dated October 2024) to address the issues they have raised.
- The Council has not made the change requested by HCC as it considers the provision of sustainable and active travel such as pedestrian and cycle infrastructure is sufficiently covered by PLP4, 2.d).
- The Council has proposed amendments to paragraphs 4.42 and 4.47 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to comments from Coastal Partners and PCC LHA. A statement of common ground has also been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- In response to the issues raised by Coastal Partners, the northern part of the Tipner East allocation is already under construction pursuant to planning permission ref. 22/01292/FUL which includes a sea wall to be constructed and maintained by the developer (or successor in title) for the lifetime of the development (subject to S106 legal agreement). The new sea wall protects the entirety of the allocation site.
- A statement of common ground has been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.
- The Council has not made the change requested by the Woodland Trust to add reference to an area-wide 15% tree cover target as this is already covered elsewhere in the Local Plan under policy PLP41.
- In response to the representation from the RSPB, the Council has proposed an amendment to para 4.54 in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has been prepared jointly with the RSPB and HIWWT (dated February 2025) to address the issues they have raised.

Strategic Site Allocation PLP5: Lakeside North Harbour

	Number of respondents
Total number of respondents	7
Respondents who raised soundness	2
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	1

A3.40 Whilst most respondents are supportive of the Lakeside North Harbour scheme, many raise additional points for consideration. Coastal Partners point out that the majority of the site will move into Flood Zone 2/3 much sooner than 2122. Hampshire County Council would like the provision of pedestrian and cycle provision linking Port Solent and Tipner to Southampton Road to be included. PCC LHA would like public transport to be included, particularly reference to the Cosham Transport Hub. PCC Public Health question whether the site could include more accessible green space for Portsmouth residents to use.

A3.41 Natural England comment that the site is adjacent to the Solent SPAs and is an area of significant supporting habitat for terrestrial waders and Brent Geese. The Woodland Trust recommend a tree coverage target of 15%.

A3.42 No representations were received from the site promoter PCC on Policy PLP5: Lakeside North Harbour.

A3.43 The following main issues were raised by specific consultation bodies on Policy PLP5: Lakeside North Harbour:

- **Natural England** commented in regard to the Solent Waders & Brent Goose Strategy (SWBGS). They note that PLP5 contains policy wording suggesting that up to two seasons of bird survey may be required to determine if the allocation itself of land adjacent to it, constitute an area of significant supporting habitat. The allocation of the site as supporting habitat within the strategy already evidences that it is an area of significant supporting habitat. It is a requirement of the agreed SWBGS that should site classification be disputed, reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology, under appropriate habitat management conditions for waders and/or brent goose usage throughout the survey period.
- **Natural England** state that PLP5 allocates 5 hectares of employment land which includes Candidate site P138. This SWBGS site is afforded protection by PLP42, but they would recommend that surveys are carried out at this site as early as possible to avoid any delay to the Habitats Regulations Assessment.
- **Hampshire County Council** as the adjoining Local Highways Authority support the allocation and suggest an amendment to include pedestrian and cycle provision linking Port Solent and Tipner to Southampton Road (A27 corridor). This would improve the opportunities for sustainable travel north of the City and from Fareham into Portsmouth.
- **PCC LHA** support the vision for Lakeside particularly the elements relating to transport. They highlight proposals for a Transport Hub at Cosham train station and they suggest adding reference to public transport links. They also request a reference to the Cosham Transport Hub as having potential to improve sustainable connectivity to the Lakeside site.

A3.44 The following main issues were raised by general and other consultation bodies on Policy PLP5: Lakeside North Harbour:

- **Coastal Partners** note that the majority of Lakeside moves into Flood Zones 2/3 much earlier than 2122.
- **PCC Public Health** state that although no housing is allocated for this site, they query whether there could be more access to open space for residents.
- **The Woodland Trust** support point e) - the 20% BNG target and the requirement for a Tree Protection Plan, the site is bounded by areas of Priority Habitat Deciduous

Woodland, and includes at least one notable tree. The Lakeside site has a high priority for trees on the UK Tree Equity Score so they recommend adding a 15% tree cover target in line with policy PLP41, the National Model Design Code, and NPPF para 136.

- **RSPB** raise concerns regarding the policy wording associated with the protection of Solent Wader and Brent Goose Strategy (SWBGS) sites; these are sites beyond the boundary of the Solent Special Protection Areas (SPAs) that provide a supportive function for populations of species for which the sites are designated.
- **RSPB** state that the Plan has identified that Lakeside has sites of functionally linked land, mapped within the SWBGS, within or in close proximity to the allocation. It is therefore important that Policy PLP5 appropriately reflects the agreed approach set out in PLP42 and the SWBGS in order to ensure no adverse effects on the integrity of the associated SPAs. The SWBGS sites identified within or in close proximity to Lakeside has been evidenced through survey effort over multiple years to inform the SWBGS. It is important to note, however, that the use of sites fluctuates particularly with the size of the Solent population of Brent Geese. In certain winters the number of juvenile Brent Geese can be relatively low and therefore, recent surveys may not be representative of site usage by the geese in more productive years. The use of sites will also vary if the land use, management, and/or level of recreational disturbance changes. The SWBGS Mitigation Guidance (SWBGS Steering Group, 2019) document outlines that should site classification, and therefore, its function as supporting habitat to the SPA, be disputed, reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period. In addition to the above, the SWBGS Mitigation Guidance provides additional wording around 'Candidate Sites', which have records of large numbers of waders or Brent Geese but have been recorded less than three times from 2006/2007 to present day. Therefore, in the particular case of Candidate Sites, further surveys are necessary to determine the classification of the site. Upon survey effort, it is likely that these sites will fall into the higher use categories, for example 'Core Area', 'Primary Support Area' and 'Secondary Support Area'. For some sites, where there has only been one survey to date, two years of data may be necessary.
- **RSPB** highlight that Strategic Site PLP5 is the only site within the Plan to have a Candidate Site within or in close proximity to the proposed strategic site. The policy (PLP5 para 4.72, p54-55) states: 'Non-breeding bird surveys may be required between October and March (typically two survey seasons) to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat.' Specific wording for paragraph 4.54 on Lakeside is provided as follows: 'Non-breeding bird surveys between October and March (typically two survey seasons) will be required to inform the detailed design of the offsetting mitigation habitat that will be provided to ensure no adverse effect on integrity.'
- **RSPB** has underlined the key sections of each strategic site's policy wording which they do not consider appropriate. The SWBGS sites within or in close proximity to Lakeside have been well-evidenced through survey efforts as part of the original SWBGS survey, alongside an updated movement study, and ad-hoc additional records submitted (Whitfield, 2020). Therefore, the RSPB considers that these sites are already confirmed as areas of significant supporting habitat. If a development applicant for these strategic sites disputes these classifications, then reclassification should only be considered if confirmed by three consecutive years of survey to the agreed methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period.

- **RSPB** state that instead of effectively inviting developers to challenge the importance of sites forming part of the network of SWBGS sites, it would be far better to require applicants to gather further records of site usage by Brent Geese and/or waders (ideally two survey seasons under 6 suitable habitat management conditions) to inform any necessary mitigation and/or avoidance measures.
- As currently worded, the **RSPB** considers the policy approach of the strategic sites identified as including or lying within close proximity of SPA functionally linked sites identified within the SWBGS including Tipner West & Horsea Island East is misleading or contains omissions that do not reflect the guidance of the SWBGS and accordingly PLP42. The RSPB therefore does not consider these policies adequately provide the required level of protection that should be afforded to SPA functionally linked land and therefore, is contrary to the Habitats Regulations.
- **RSPB** considers that in order for policy relating to SWBGS sites to grant the right level of protection afforded to functionally linked land to the Solent SPAs, and therefore, fully consider and adhere to the requirements of the Habitats Regulations, changes must be made in the wording relating to PLP5. Until such changes are made, the RSPB does not consider the Draft Plan to be legally compliant or sound.
- **RSPB** suggest the following changes to paragraph 4.72: Non-breeding bird surveys may be required between October and March (typically two survey seasons <u>under suitable habitat management conditions</u>) to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat, <u>and inform the detailed design of any mitigation and/ avoidance measures that may need to be provided to ensure no adverse effect on integrity.</u>'

Strategic Site Allocation PLP5: Lakeside North Harbour - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with PCC Property (dated August 2024), site promoters of Lakeside North Harbour. They made no representations on the Portsmouth Pre-Submission Local Plan 2024.
- In response to the representation from Natural England, the Council has proposed amendments to criterion 4.d) in the Schedule of Changes to the Pre-Submission Local Plan 2024.
- In response to representations from Natural England and RSPB, the Council has proposed amendments to paragraph 4.72 in the Schedule of Changes to the Pre-Submission Local Plan 2024.
- The Council has not made the change requested by Hampshire County Council as the amendment relates to project-level detail not needed for the Local Plan.
- In response to the representation from PCC as LHA, the Council has proposed changes to para 4.62 in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has also been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.
- The Council has not made the change requested by the Woodland Trust to add reference to an area-wide 15% tree cover target as this is already covered by the City-wide policy PLP41: Trees & Hedgerows.
- The Council has proposed modifications in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to the concerns raised by the RSPB. A statement of common ground has also been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.

Strategic Site Allocation Policy PLP6: Portsmouth City Centre

	Number of respondents
Total number of respondents	7
Respondents who raised soundness	5
Respondents who raised legal compliance	3
Respondents who raised Duty to Cooperate	3

A3.45 Themes from the open comments concern: air quality, transport, heritage, trees and the University of Portsmouth. Some respondents support the City centre allocation but would like potential impact (positive and negative) on air quality to be an integral part of the development strategy with strengthened wording in the policy. Some respondents welcome developments in the City centre as they lend themselves to sustainable modes of travel. However, they also caution that any development will inevitably also put pressure on road networks and increase private vehicle traffic. One also disagrees with the definition of rental e-scooters and e-bikes as Mobility as a Service (MaaS) and would prefer it to be defined as part of the micromobility strategy. Two respondents feel that there is insufficient heritage detail in the policy

and think Heritage Impact Assessments are needed for the City Centre North area. Two respondents raise concern that the plans do not allow for enough trees and would like an area wide 15% tree cover target. They are also concerned that planned tree planting in the green corridors in the area will not have sufficient soil depth to thrive and question how permeable and appropriately sized the new park will be. The University of Portsmouth is supportive of the policy but would like the Northern Quarter of their property portfolio to be included in the site allocation as, in due course, land will become available in that area to be used by the City rather than by the University. They also suggest widening the definition of 'educational land use' to reflect mixed land use.

A3.46 The following main issues were raised by one of the site promoters (**Welbeck for the former Matalan site (ref. CD16 from the HELAA), represented by Union4 Planning Ltd**) on Policy PLP6: Portsmouth City Centre (no other site promoters for this allocation responded):

- Part 5 of the Policy PLP6 focuses on residential development within the Station Road Regeneration Area, with only passing mention to 'and other needs'. Given the City centre location and accessibility provided by the adjacent station, they suggest that it would be a missed opportunity to not exploit this location for significant economic development and job creation. It was on the basis of emerging policy that schemes were progressed for employment development in the area and which received the full support of PCC through the pre-application process. They suggest that this is contradicted by the current wording of section 5 of the policy which should also reflect the live and recently-consented non-residential schemes within the Regeneration Area.
- Policy should promote housing and economic development with equal weighting.
- Paragraphs 4.87, 3.11, 4.91 and 4.114 are not sound, legally compliant and do not comply with Duty to Cooperate.
- Paragraph 4.87 needs to be updated to reflect the consents at Slindon Street Post Office and live applications at Matalan and Debenhams.
- In addition to current consents and allocations, development for employment floorspace should also be encouraged and supported on non-allocated sites where suitable. This would act as a buffer in the event that any current consents or allocations did not come forward, as well as increasing economic growth, employment floorspace and capacity to accommodate any unmet need from neighbouring LPAs. Paragraph 3.11 should be updated to reflect this.
- Paragraph 4.91 refers to residential development coming forward around Station Road, including the Matalan Site. This is inaccurate as only office floorspace is proposed at the Matalan Site and thus, the paragraph should be updated to reflect this.
- The application referred to under paragraph 4.114 has been superseded by more recent pre-application discussions and also a planning application. The paragraph should be updated to reflect this.

A3.47 The following main issues were raised by specific consultation bodies on Policy PLP6: Portsmouth City Centre:

- **Historic England** suggest that paragraph 4 of policy PLP6 requires editing informed by proportionate heritage impact assessment.
- **Historic England** suggest that major development in the City Centre should demonstrate how its design enhances the centre's appearance, 'responds positively to

its heritage significance and considers the needs and safety of all its users including reducing crime, through the provision of a design code.'

- **Historic England** request changes to para 4.105 to read: 'A substantial new green space will create a new link between St Agatha's and All Saints Churches'
- **Historic England** highlight that the Council's Commercial area includes four Grade II listed buildings (105 Commercial Road, 116 and 118 Commercial Road, Trafalgar House and Connaught Drill Hall). Also, the area includes other handsome buildings (e.g. 107 Commercial Road) and features of interest such as the Jubilee Fountain (which we note is mentioned in criterion 4). There is significant use of high-quality materials such as Portland Stone. The character of this area is intimately bound up with the Portsmouth story. But the Local Plan does not seem to connect with this heritage. It appears not to be fully understood or appreciated, thus hampering positive heritage planning for the site's future.
- **Network Rail** identify that Portsmouth and Southsea station is a key part of the regeneration area and forms a gateway for the City centre. They request that capacity at the station should be considered as and when nearby development comes forward to ensure the station remains fit for purpose. This should be reflected in both the draft site allocation wording and the supporting text. They also suggest that proposals around the Station should contribute towards improving accessibility and improvements at the station to mitigate the impact of additional users. They suggest the following amended wording:

  'This area is key for the implementation of sustainable transport measures and promoting modal shift in the City Centre. The area in front of the Station has the potential to act as a significant gateway to the City, and proposals that enhance the setting of the station and improve the street scene / landscaping of the area will be welcomed. The Station building is listed, however, its quality has been impacted by later additions and poor maintenance, leading to it feeling unkept and unwelcoming. Enhancements to the Station building in order to improve its role as a gateway, and its legibility, permeability and accessibility for users will be encouraged. Station improvements to enhance the facilities and accessibility for users will also be sought. Commercial uses in the Station will be supported.'
- **PCC LHA / PCC Public Health** propose that paragraph 2.e) is amended to 'Deliver or contribute proportionally to the relevant transport and highways mitigation measures identified within the Local Plan Strategic Transport Assessment, Infrastructure Delivery Plan, and Local Transport Plan 4 (Portsmouth Transport Strategy).' Linked to the above position (reduction of traffic volumes as the preferred mitigation strategy for City centre highway impacts), they also request that paragraph 2.f) be amended to 'Any severe impacts on the highways network identified as resulting from development as part of the City Centre strategic site must be mitigated following a robust assessment and reduce the volume and/or impact of private vehicle traffic, to an appropriate level.'
- **PCC LHA / PCC Public Health** identify that the supporting text para 4.98 does recognise that the Clean Air Zone (CAZ) was implemented as a measure aimed at supporting achievement of compliance with minimum air quality standards (set out in legislation) due to persistent non-compliance with these standards at several monitoring stations. Air quality assessment work commissioned as part of the Local Plan evidence base indicates that the City Centre Road scheme is forecast to worsen Air Quality. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
- **PCC LHA / PCC Public Health** state that in order to help address air quality issues, the importance of prioritising sustainable modes of travel into the City centre from across the

City and beyond the City boundary needs to be recognised, through a wide range of measures identified in the Portsmouth Transport Strategy (which will increase walking, cycling, public transport usage), to secure modal shift and reduce traffic volumes in the City Centre as mitigation against poor air quality.

- **PCC LHA / PCC Public Health** state that para 4.98 should be expanded/ revised to reflect the strategic approach which is set out in the Portsmouth Transport Strategy. They state that paragraph 2.g) should be amended to incorporate the final sentence in the supporting wording paragraph 4.98, becoming: 'Provide evidence that air quality in adjoining AQMAs is not worsened. Development proposals should take opportunities to improve air quality and mitigate negative impacts on air quality in the adjoining AQMAs as required.'
- **PCC LHA** state that, regarding paragraph 4.97, the current text mis-states what Mobility as a Service (MaaS) is. Shared/ hired e-scooters and bikes/ e-bikes are a form of micromobility (rather than Maas). It is important to clarify that these are not the same as MaaS. The LHA has been a promoter of MaaS as a partner in Solent Transport. They would welcome policy wording which positively promotes MaaS, in addition to alteration of the wording in paragraph 4.97.
- **PCC LHA** support the vision for the City Centre stated in paragraph 4.89. This allocation will provide a large uplift in development in a location that is highly favourable in transport terms.
- **PCC LHA** support Policy PLP6 which contains provisions which the LHA supports, particularly 2.c), d) and l), as these align well with policies and objectives within the Portsmouth Transport Strategy. The LHA is also supportive of supporting text paragraph 4.99 (reduced city centre parking provision, infrastructure for sustainable forms for transport, car free streets/ pedestrianisation proposals etc.).
- **PCC LHA** state that the development of City Centre North should encourage a modal shift away from the use of the private car to prioritise use of sustainable transport given the sustainability of its location through a range of actions/measures.

A3.48 The following main issues were raised by general and other consultation bodies on Policy PLP6: Portsmouth City Centre:

- **The Woodland Trust** highlight that parts of the City Centre have tree cover as low as 9%. They therefore, recommend adding an area-wide 15% tree cover target, in line with policy PLP41.
- **PCC Public Health** have highlighted that the City centre touches a lot of green corridors and there are a lot of green corridors running through site. There is a need to ensure that trees in this area being planted into corridors have enough soil volume to survive.
- **PCC Public Health** ask how permeable the 2.9ha park will be.
- **The University of Portsmouth (UoP)** identify that their existing estate in the City centre can also make an important contribution towards the mixed-use and regenerative objectives of the City centre. In particular, the Northern Quarter area of the campus is located to the immediate west of the Guildhall Quarter. The extent of the Northern Quarter is identified in red on Figure 1 below.

They state that their programme for the Northern Quarter (a University proposal) is at a very early stage and that they are not able to provide specifics. They recommend the Northern Quarter is incorporated within the Strategic Site City Centre boundary. They also recommend it is specifically included within an extension of the Guildhall Cultural Regeneration Quarter area.

- **UoP** welcomes the ambitious growth and regeneration objectives for the City centre.
- **UoP** welcome the inclusion of criterion i) in Part 2 of the policy and supporting paragraph 4.100 to require schemes to complement the University's Estate Masterplan (where relevant) is particularly welcomed.
- The function and role of **UoP** including the importance of education uses should however be strengthened in the Policy PLP6 wording to confirm that education as a specific land use is supported either in isolation or as part of a mixed use scheme. This should be added to the list of allocated uses in Part 1. d) of the policy.

Strategic Site Allocation Policy PLP6: Portsmouth City Centre - Council response

How the representations have been taken into account:

- Policy PLP6: Portsmouth City Centre from the Portsmouth Pre-Submission Local Plan 2024 been entirely replaced by a new Policy PLP6: Portsmouth City Centre in the Portsmouth Pre-Submission Local Plan Addendum 2025. Issues raised on this policy have largely been covered by the new policy.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- A statement of common ground has been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared with PCC LHA (dated November 2024) and PCC Public Health (dated February 2025) to address the issues they have raised.
- A statement of common ground has been prepared with James Brothers, Wellingborough Limited (dated May 2024), promoters of 200-204 Commercial Road, part of the Portsmouth City Centre allocation. They made no representations on the Portsmouth Pre-Submission Local Plan 2024.
- A statement of common ground has been prepared with Slindon Street Portsmouth Ltd (dated March 2024), promoters of the Portsmouth Mail Centre, part of the Portsmouth City Centre allocation. They made no representations on the Portsmouth Pre-Submission Local Plan 2024.

Strategic Site Allocation Policy PLP7: Fratton Park & the Pompey Centre

	Number of respondents
Total number of respondents	7
Respondents who raised soundness	4
Respondents who raised legal compliance	3
Respondents who raised Duty to Cooperate	3

A3.49 Themes from the open comments concern transport and green issues. Respondents support the addition of an off-road walking and cycling route to link to the station. However, they feel that it has been made an important part of the plans before a feasibility study being completed and with insufficiently strong language to show it is a core responsibility of the developer to provide such a route. They would also like the policy to include reference to provision of a drop off/pick up area for a match day park and ride service from Tipner Park & Ride. Respondents also question the soil depth for new trees in the area, whether more could be done through greening to help cooling in the area, and whether the plans allow enough space for the legally required amount of accessible green space.

A3.50 Representations on Policy PLP7: Fratton Park & the Pompey Centre were not received from any of the site promoters, namely Portsmouth Football Club and Box+III Portsmouth Ltd c/o M7 Real Estate.

A3.51 The following main issues were raised by specific consultation bodies on Policy PLP7: Fratton Park & the Pompey Centre:

- **Network Rail** noted the sustainable location of this strategic site given the proximity to Fratton station. Any proposals to expand stadium capacity in addition to new residential/commercial/mixed-uses at the site should consider station capacity. They support the provision of an appropriate and accessible pedestrian and cycle route from Fratton Station to the stadium as stated in the policy, but indicate that the absence of considering station improvements made the plan unsound. They suggest amended policy wording to criteria 2 that 'new development should consider impact on the rail station and its capacity alongside station improvements to mitigate additional use.'
- **PCC LHA** support the vision for the Pompey Centre and the transport elements of the policy. They note PCC contributed to a Feasibility Study for improved walking and cycling link to Fratton Station, which is not yet complete and requires further work to develop the scheme. It is stated that criteria 2 and 3 place significant emphasis on the pedestrian cycle link although the feasibility study is incomplete. They suggest amendment to the policy to include reference to provision of a drop off/pick up area for a match day Park & Ride service from Tipner Park & Ride / Transport Hub.
- **PCC LHA** suggest amendment to criteria 2 to read: 'An appropriate, accessible off-road pedestrian and cycle route connecting Fratton Station to the Pompey Centre and Fratton Park shall be provided by the developer with wider public realm improvements. Development will be expected to integrate with this route.'

A3.52 The following main issues were raised by general and other consultation bodies on Policy PLP7: Fratton Park & the Pompey Centre:

- **Pompey Supporters Trust (PST)** indicate that the policy reflects the stated aspirations of Portsmouth Football Club (PFC) in terms of providing an expansion to the North Stand of the stadium, a supporting hotel, and mixed conference event facilities. The PST

support providing an off-road pedestrian and cycle route connecting Fratton Station to the stadium, however, they do not believe this is essential for stadium expansion.

- **PCC Public Health** flag that this site touches green corridors to the north east and south, and ask what provisions can be made through development to support the corridor. They highlight there is a need to ensure that trees in this area planted into corridors have enough soil volume to survive. They ask how development of the site can help connect people living west of the railway line/ Walmer Road area. They flag that this is a hot part of the City and ask what scope there is to bring green infrastructure into this development that supports cooling, e.g. green roofs.
- **The Woodland Trust** support policy criterion 5(f) on green infrastructure and note the area has low tree cover of around 9% and is the highest priority for new trees. They therefore, suggest amendment to policy to add an area-wide 15% tree cover target.
- One representor commented that the policy is not sound due to it not being justified for the following reasons:
    - Public representations regarding housing targets were disregarded at the May Extraordinary Full Council meeting.
    - Traffic flows have deteriorated significantly since the opening of Aldi, Matalan and Home Bargains stores at the Pompey Centre.
    - No evidence is provided to support the allocation of 710 residential dwellings at the site and how the impact of development on infrastructure and services in the local area will be mitigated.
    - No evidence is provided that demonstrated visitors using the train will utilise the off-road pedestrian and cycle route and no evidence that additional visitors to the expanded football station will use the train.
    - No evidence is provided of risk to pedestrians especially those walking to the stadium caused by the congested road network. They query how Portsmouth Football Club and Portsmouth City Council will mitigate risk.
    - No detail is provided on reasonable alternatives explored to avoid the site's dependency on the off-road pedestrian and cycle route.
- One representor commented that the policy is not sound, due to it not being effective for the following reasons:
    - The Plan does not address working with Network Rail / access to Network Rail land to build the off-road pedestrian and cycle route and therefore there is no evidence the policy is deliverable over the plan period.
    - A Statement of Common Ground has not been entered into with Network Rail meaning the policy does not meet the test for being considered effective.
- One representor suggested amendment to the Plan to remove the allocation of residential dwellings and remove the requirement for an off-road pedestrian and cycle route.

Strategic Site Allocation Policy PLP7: Fratton Park & the Pompey Centre - Council response

How the representations have been taken into account:

- Policy PLP7: Fratton Park & the Pompey Centre from the Portsmouth Pre-Submission Local Plan 2024 has been replaced entirely with a new policy PLP7: Fratton Park & the Pompey Centre from the Portsmouth Pre-Submission Local Plan Addendum 2025. Issues raised on this policy have largely been covered by the new policy.
- A statement of common ground has been prepared with Portsmouth Football Club (dated October 2024). They made no representations on the Portsmouth Pre-Submission Local Plan 2024.
- A statement of common ground has been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- PCC continues to liaise with the new owners of the Pompey Centre regarding their future proposals for this part of the site.
- PCC continues to liaise with PCC LHA regarding this site allocation, a statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.

Strategic Site Allocation Policy PLP8: St James' & Langstone Campus

	Number of respondents
Total number of respondents	9
Respondents who raised soundness	4
Respondents who raised legal compliance	4
Respondents who raised Duty to Cooperate	3

A3.53 Themes from the open comments concern: green issues, transport and heritage protection.

A3.54 Respondents would like to ensure any negative impact on natural habitats is mitigated (Brent Geese mentioned), ensure new trees planted have sufficient soil depth and introduce an area-wide 15% tree cover target. Respondents note that the area is currently poorly served by active or public transport options and mitigation will be required in the area to reduce private vehicle traffic and provide vulnerable residents, or their visitors, with public transport options. One respondent would like the protection of heritage assets to be reinforced in the policy wording.

A3.55 The following main issues were raised by the **University of Portsmouth (UoP) as one of the site promoters** on Policy PLP8: St James' & Langstone Campus:

- The **UoP** support the identification of its campus land in forming part of the wider strategic development of the site. They note that they have entered into a statement of common ground for the site and policy. This provides confirmation of support and soundness of the site allocation.

A3.56 No representations were received from the site promoters for the other parcels of land namely Homes England, PJ Livesey and the NHS.

A3.57 The following main issues were raised by specific consultation bodies on Policy PLP8: St James' & Langstone Campus:

- **Historic England** broadly support the thrust of the policy but suggest amendment to policy wording of criterion 2(a) to 'Retain St James' Hospital (Grade II listed), the Chapel (Grade II listed), and all other heritage assets in the hospital grounds and conserve or enhance their significance (including their setting).' This amendment removes 'and conserve the significance and setting of' and adds it to the end of the criterion.
- **Natural England** comment in regard to the Solent Wader & Brent Goose Strategy. They note that PLP 8 contains policy wording suggesting that up to two seasons of bird survey may be required to determine if the allocation itself of land adjacent to it, constitute an area of significant supporting habitat. The allocation of the site as supporting habitat within the strategy already evidences that it is an area of significant supporting habitat. It is a requirement of the agreed SWBGS that should site classification be disputed, reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology, under appropriate habitat management conditions for waders and/or brent goose usage throughout the survey period.
- **PCC LHA** support the vision and transport elements of the policy. They note that the site has poor public transport and active travel links so development of the site would require a strong mitigation package to avoid risk of becoming car dependant and contrary to the Transport Strategy.

A3.58 The following main issues were raised by general and other consultation bodies on Policy PLP8: St James' & Langstone Campus:

- **Coastal Partners** note that the majority of St James' and Langstone Campus moves into Flood Zones 2/3 much earlier than 2122.
- **Sport England** note that policy criterion 3(b) is inconsistent with paragraph 103 of the NPPF and therefore, not sound by suggesting it is optional to retain playing field/pitches on the site. Sport England suggest amendment to policy criterion 3(b) to remove the wording *'where possible'*.
- **PCC Public Health** ask how development at the site can support green corridor development and how this could tie into development at Fort Cumberland. They query scope for trees on site to provide cooling benefits and sustainable transport to support vulnerable residents and their visitors.
- **The Woodland Trust** support policy criteria 2c) and 2d) for protecting the parkland setting and on tree protection. They note the area has tree cover of 12%, below the policy target of 15%, they therefore, suggest amendment to the policy to add a 15% tree cover target.
- **Milton Neighbourhood Forum** state that although they welcome the proposed reduction in the housing allocation for Strategic Policy PLP8 from 436 to 417, the lower figure ought to be amended to 208 to account for the 209 new homes already approved since Regulation 18 and currently under development following the 2023 successful Appeal under reference APP/Z1775/W/22/3302931 and APP/Z1775/Y/22/3302927.
- **RSPB** raise concerns regarding the policy wording associated with the protection of Solent Wader and Brent Goose Strategy (SWBGS) sites; these are sites beyond the

boundary of the Solent Special Protection Areas (SPAs) that provide a supportive function for populations of species for which the sites are designated.

- **RSPB** state that the Draft Plan has identified that St James' & Langstone Campus has sites of functionally linked land, mapped within the SWBGS, within or in close proximity to the allocation. It is therefore, important that Policy PLP8 appropriately reflects the agreed approach set out in PLP42 and the SWBGS in order to ensure no adverse effects on the integrity of the associated SPAs.
- **RSPB** note that SWBGS sites identified within or in close proximity to St James' & Langstone Campus have been evidenced through survey effort over multiple years to inform the SWBGS. It is important to note, however, that the use of sites fluctuates particularly with the size of the Solent population of Brent Geese. In certain winters the number of juvenile Brent Geese can be relatively low and therefore recent surveys may not be representative of site usage by the geese in more productive years. The use of sites will also vary if the land use, management, and/or level of recreational disturbance changes.
- **RSPB** highlight that SWBGS Mitigation Guidance (SWBGS Steering Group, 2019) document outlines that should site classification, and therefore, its function as supporting habitat to the SPA, be disputed, reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period.
- **RSPB** note that the SWBGS Mitigation Guidance provides additional wording around 'Candidate Sites', which have records of large numbers of waders or Brent Geese but have been recorded less than three times from 2006/2007 to present day. Therefore, in the particular case of Candidate Sites, further surveys are necessary to determine the classification of the site. Upon survey effort, it is likely that these sites will fall into the higher use categories, for example 'Core Area', 'Primary Support Area' and 'Secondary Support Area'. For some sites, where there has only been one survey to date, two years of data may be necessary.
- **RSPB** note that other strategic sites with the potential to impact a higher classification (i.e. Core Area, Primary Support Area, Secondary Support Area, Low Use) of SWBGS site including PLP8. Specific policy wording has been provided as follows for para 4.168, p.81: 'The developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsars. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat.'
- **RSPB** underline the key sections of each strategic site's policy wording which they do not consider appropriate. The SWBGS sites within or in close proximity to St James' & Langstone Campus have been well-evidenced through survey efforts as part of the original SWBGS survey, alongside an updated movement study, and ad-hoc additional records submitted (Whitfield, 2020). Therefore, the RSPB considers that these sites are already confirmed as areas of significant supporting habitat. If a development applicant for these strategic sites disputes these classifications, then reclassification should only be considered if confirmed by three consecutive years of survey to the agreed methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period.
- **RSPB** state that instead of effectively inviting developers to challenge the importance of sites forming part of the network of SWBGS sites, it would be far better to require applicants to gather further records of site usage by Brent Geese and/or waders (ideally

two survey seasons under 6 suitable habitat management conditions) to inform any necessary mitigation and/or avoidance measures.

- As currently worded, the **RSPB** consider the policy approach of the strategic sites identified as including or lying within close proximity of SPA functionally linked sites identified within the SWBGS including St James' & Langstone Campus is misleading or contains omissions that do not reflect the guidance of the SWBGS and accordingly PLP42. The RSPB therefore, does not consider these policies adequately provide the required level of protection that should be afforded to SPA functionally linked land and therefore is contrary to the Habitats Regulations.
- **RSPB** consider that in order for policy relating to SWBGS sites to grant the right level of protection afforded to functionally linked land to the Solent SPAs, and therefore, fully consider and adhere to the requirements of the Habitats Regulations, changes must be made in the wording relating to PLP8. Until such changes are made, the RSPB does not consider the Draft Plan to be legally compliant or sound.
- **RSPB** suggest the following changes to paragraph 4.168: 'Measures must be taken to ensure that any direct recreational impact on nationally designated sites and supporting habitat is alleviated. The site contains Core and Secondary support areas for Brent Geese and is located in close proximity to several others. The developer should provide evidence that the allocated site will not result in the loss of or damage to habitat that is functionally linked to Solent's SPAs / Ramsars. ~~To demonstrate this, n~~Non-breeding bird surveys between October and March (typically two survey seasons under suitable habitat management conditions) may be required ~~to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally linked to Habitats sites~~, inform the detailed design of suitable mitigation and / or avoidance measures ~~will be required~~, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity. Proposals will need to be determined in line with Policy PLP42 of this Local Plan and the Guidance on Mitigation and Off-setting Requirements. These include the Solent Waders and Brent Goose Strategy 2020, Milton Common Local Nature Reserve Mitigation and Management Framework 2022 and any subsequent guidance documents. Mitigation must also be to the satisfaction of the Local Planning Authority and Natural England.'

Strategic Site Allocation Policy PLP8: St James' & Langstone Campus - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with the University of Portsmouth as one of the site promoters (dated October 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Homes England as one of the site promoters (dated June 2024). They made no representations on the Portsmouth Pre-Submission Local Plan 2024.
- A statement of common ground has been prepared with PJ Livesey as one of the site promoters (dated June 2024). They made no representations on the Portsmouth Pre-Submission Local Plan 2024.
- In response to comments made by Historic England the Council has proposed amendments to criterion 2.a) in the Schedule of Changes to the Pre-Submission

Local Plan 2024. A statement of common ground has also been prepared with Historic England (dated 2025) to address the issues they have raised.

- In response to comments made by Natural England, the Council has proposed amendments to criterion 4.b) in the Schedule of Changes to the Pre-Submission Local Plan 2024. Changes have also been proposed to para 4.168 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to comments from both Natural England and the RSPB. A statement of common ground has also been prepared jointly with the RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- In response to comments by Coastal Partners, no change is proposed by the Council. Information on future flooding provided in the Strategic Flood Risk Assessment 2 is a snapshot as of 2122. Although it may be accurate to say that the flood zones for the site change before then, there is no evidence on *when* that will happen other than it will have happened *by* 2122.
- A statement of common ground has been prepared with Sport England (dated February 2025) to address the issues they have raised.
- The Council has not taken forward the comments from PCC Public Health. This is because an existing green corridor running along Furze Lane is already shown in figure 9.1: the Portsmouth Green Grid including Local Green Spaces and Green Corridors. The Council considers that it is not feasible to extend the green corridor down to Fort Cumberland due to the dense urban nature of the City in this area. In response to PCC Public Health's comment on trees, all the tress throughout the site are protected by Policy PLP8,2d). There is limited scope to plant additional trees, because much of the open land is functionally linked land used by Solent Waders and/or Brent Geese. A statement of common ground has been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.
- The Council has not made the change requested by the Woodland Trust to add reference to an area-wide 15% tree cover target as this is already covered by the City-wide Policy PLP41: Trees & Hedgerows.
- The Council has not taken forward the comments from Milton Neighbourhood Forum as this would be a different approach to expressing site numbers to that the Council is using across the other strategic sites and allocations. A statement of common ground has been prepared with Milton Neighbourhood Forum to address the issues they have raised.
- A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.

Strategic Site Allocation Policy PLP9: Horsea Island Open Space

	Number of respondents
Total number of respondents	6
Respondents who raised soundness	2
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	0

A3.59 Themes from the open comments cover support for the scheme in terms of travel options and open space, concerns around green issues, and the MoD's safeguarding requirements.

A3.60 Respondents support the provision of a new segregated busway/cycle and pedestrian link, as well as the provision of new areas of open space. Others are cautious about the quality and usability of the new open space suggesting current management of the site is not great, allowing ruderals (e.g. nutrient-heavy weed species) to flourish. One respondent is also cautious about potential damage to natural habitats for Solent Waders and Brent Geese.

A3.61 The MoD is supportive of the scheme but would like the wording around safeguarding requirements changed or strengthened slightly.

A3.62 No representations were received from the site promoter (Portsmouth City Council) on Policy PLP9: Horsea Island Open Space.

A3.63 The following main issues were raised by specific consultation bodies on Policy PLP9: Horsea Island Open Space:

- **Hampshire County Council** as the neighbouring local highway authority support this site allocation and policy requirement for a segregated busway/cycle and pedestrian link through the site via the new bridge at Horsea.
- **Fareham Borough Council** support the inclusion of the allocation in providing valuable open space provision for residents of the City and the nearby population, as well as providing opportunities for wildlife habitat and biodiversity.
- **Natural England** commented in regard to the Solent Wader & Brent Goose Strategy. They note that PLP9 contains policy wording suggesting that up to two seasons of bird survey may be required to determine if the allocation itself of land adjacent to it, constitute an area of significant supporting habitat. The allocation of the site as supporting habitat within the strategy already evidences that it is an area of significant supporting habitat. It is a requirement of the agreed SWBGS that should site classification be disputed, reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology, under appropriate habitat management conditions for waders and/or brent goose usage throughout the survey period.
- **PCC LHA** support the vision for Horsea Island Open Space in particular Para 1e relating to provision of a new busway / cycle and pedestrian link between Tipner West and Port Solent.

A3.64 The following main issues were raised by general and other consultation bodies on Policy PLP9: Horsea Island Open Space:

- **PCC Public Health** ask if the green corridor is appropriate here, they raise concern about the current management plan for the site given the combination of a 'wildflower mix' and trees, and evidence that ruderals are already creeping in. They note that there will be 64 ha of open space, but ask how much of this will be accessible, this will be a destination space, but they ask what the plans will be and how people's experiences can be supported.
- The **DIO (for MoD)** welcomes that 'proposals will need to be in line with the restrictions imposed by the MoD exclusion zone as shown on figure 4.9 in line with the MoD's guidance on exclusion zones'. The MoD request that the wording of the supporting text at 4.179 and 4.190 is updated to reflect MoD safeguarding requirements. The MoD note that the Masterplan also detailed proposed arrangements for public access including provision of a car park adjacent to the Household Waste Recycling Centre a park road, cycleway and footpath network. It is anticipated that some of the proposals as set out in the Landscape Masterplan may have to be adapted to take account of the MoD's statutory safeguarding zone(s) which serves to ensure that new development does not restrict or compromise defence operations or capability, updated environmental information and results of the work currently being undertaken in regard to retained gas infrastructure. Re para 4.190 Adjacent to the proposed Strategic Open Space on the south western side is the Defence Diving School, which is an MoD-run facility. Part of the site is used for munitions storage. To ensure that development does not restrict or otherwise compromise defence operations and capability, a statutory safeguarding zone is in place across part of the adjoining open space. Within the statutory safeguarding zone, the MoD is required to be consulted in relation to any planning applications in respect of the following development: to carry out building, mining, or other operations to make any material changes in the use of building or other land.
- **Portsmouth Cycle Forum** also raised concern about the flooding at the access to the Paulsgrove Recycling Centre and would like to see this addressed.
- **RSPB** raise concerns regarding the policy wording associated with the protection of Solent Wader and Brent Goose Strategy (SWBGS) sites; these are sites beyond the boundary of the Solent Special Protection Areas (SPAs) that provide a supportive function for populations of species for which the sites are designated.
- **RSPB** state that the Draft Plan has identified that Horsea Island Open Space has sites of functionally linked land, mapped within the SWBGS, within or in close proximity to the allocation. It is therefore, important that Policy PLP9 appropriately reflects the agreed approach set out in PLP42 and the SWBGS in order to ensure no adverse effects on the integrity of the associated SPAs.
- **RSPB** have highlighted that the use of sites fluctuates particularly with the size of the Solent population of Brent Geese. In certain winters the number of juvenile Brent Geese can be relatively low and therefore recent surveys may not be representative of site usage by the geese in more productive years.
- **RSPB** highlight that the SWBGS Mitigation Guidance (SWBGS Steering Group, 2019) document outlines that should site classification, and therefore its function as supporting habitat to the SPA, be disputed reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period.
- **RSPB** highlight that the SWBGS Mitigation Guidance provides additional wording around ‘Candidate Sites’, which have records of large numbers of waders or Brent Geese but have been recorded less than three times from 2006/2007 to present day. Therefore, in the particular case of Candidate Sites, further surveys are necessary to determine the

classification of the site. Upon survey effort, it is likely that these sites will fall into the higher use categories, for example 'Core Area', 'Primary Support Area' and 'Secondary Support Area'. For some sites, where there has only been one survey to date, two years of data may be necessary.

- **RSPB** have requested the specific policy wording has been provided as follows for para 4.189, p.87: 'To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsars. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat.'
- **RSPB** have underlined the key sections of each strategic site's policy wording which they do not consider appropriate. The SWBGS sites within or in close proximity to Horsea Island Open Space have been well-evidenced through survey efforts as part of the original SWBGS survey, alongside an updated movement study, and ad-hoc additional records submitted (Whitfield, 2020). Therefore, the RSPB considers that these sites are already confirmed as areas of significant supporting habitat. If a development applicant for these strategic sites disputes these classifications, then reclassification should only be considered if confirmed by three consecutive years of survey to the agreed methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period.
- **RSPB** state that instead of effectively inviting developers to challenge the importance of sites forming part of the network of SWBGS sites, it would be far better to require applicants to gather further records of site usage by Brent Geese and/or waders (ideally two survey seasons under 6 suitable habitat management conditions) to inform any necessary mitigation and/or avoidance measures.
- **RSPB** consider the policy approach of the strategic sites identified as including or lying within close proximity of SPA functionally linked sites identified within the SWBGS including Horsea Island Open Space is misleading or contains omissions that do not reflect the guidance of the SWBGS and accordingly PLP42. The RSPB therefore does not consider these policies adequately provide the required level of protection that should be afforded to SPA functionally linked land and therefore is contrary to the Habitats Regulations.
- **RSPB** consider that in order for policy relating to SWBGS sites to grant the right level of protection afforded to functionally linked land to the Solent SPAs, and therefore fully consider and adhere to the requirements of the Habitats Regulations, changes must be made in the wording relating to PLP5. Until such changes are made, the RSPB does not consider the Draft Plan to be legally compliant or sound.
- **RSPB** suggest the following changes to paragraph 4.189: 'The western part of Horsea Island is identified as Core Area P48A / P48B of the Solent Waders and Brent Goose Strategy and the eastern part of the site is identified as Primary Support Area P48C. In addition a small area adjoining the southern part of the site is identified as Core Area P75. Development impacting these areas will require mitigation. in accordance with Policy PLP42: Solent Waders & Brent Geese Sites of this Local Plan and the Guidance on Mitigation and Off-setting Requirements and to the satisfaction of the local planning authority and Natural England. To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the allocated site will not result in the loss of or damage to habitat that is functionally linked to Solent's SPAs / Ramsars. ~~To demonstrate this, n~~Non-breeding bird surveys between October and March (typically two survey seasons under suitable habitat

management conditions) may be required to ~~determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally linked to Habitats sites~~, inform the detailed design of suitable mitigation and / or avoidance measures ~~will be required~~, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity.'

Strategic Site Allocation Policy PLP9: Horsea Island Open Space - Council response

How the representations have been taken into account:

- Policy PLP9: Horsea Island Open Space from the Portsmouth Pre-Submission Local Plan 2024 was entirely replaced with a new policy PLP9: Horsea Island Strategic Open Space in the Portsmouth Pre-Submission Local Plan Addendum 2025. Issues raised on this policy have largely been covered by the new policy.
- A statement of common ground has been prepared with the DIO for the MoD to address the issues they have raised.
- A statement of common ground has been prepared with PCC LHA to address the issues they have raised.
- A statement of common ground has been prepared with PCC Public Health to address the issues they have raised.
- A statement of common ground has been prepared jointly with RSPB and HIWWT to address the issues they have raised.

Chapter 5: Site Allocations

	Number of respondents
Total number of respondents	3
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.65 Only three comments were made on the whole chapter. First (First Hampshire & Dorset Ltd - bus company) would like more smaller sites to be added to the Local Plan such as the Hilsea Bus Depot for use as industrial/commercial units. The other comment relates to the Fraser Range site pointing out that sustainable transport options need to be added to the plan as the current nearest high frequency bus route is around 1.3km away at Eastney.

A3.66 The following main issues were raised by specific consultees on Chapter 5: Site Allocations:

- **PCC LHA** is supportive of the majority of the chapter, and particularly the transport elements of policies on Land West of Portsdown Technology Park, Port Solent (Tipner-Horsea Island sustainable transport modes bridge), St John's College, the News Centre and Somers Orchard. Regarding Fraser Range, due to the low public transport accessibility of the site, it is suggested that wording should be added to ensure development contributes to enhancements to sustainable transport access.

A3.67 The following main issues were raised by general and other consultees on Chapter 5: Site Allocations:

- **First Hampshire & Dorset Ltd (part of the First Group)** contend that the Local Plan is not sound as it has not been positively prepared and is inappropriate due to its reliance on a few large sites coming forward, raising significant risk in terms of deliverability and that these sites do not meet identified employment needs. They contend that employment land provision should be increased by allocating additional sites to make the plan more robust and meet market demand, as supported by the background evidence to the Local Plan. This would include Hilsea Bus Depot.
- **HIWWT** state that, in planning for housing needs, the Council must be confident that the environment can accommodate the cumulative effects of development at this scale. Environmental limitations must be considered. The ecological map (and when in place the LNRS) should be referred to when deciding site allocations.

Chapter 5: Site Allocations - Council response

How the representations have been taken into account:

- The introduction to Chapter 5: Site Allocations from the Portsmouth Pre-Submission Local Plan 2024 has been replaced by a new introduction to Chapter 5: Site Allocations in the Portsmouth Pre-Submission Local Plan Addendum 2025. There are also new policies Land West of Portsdown Technology Park (PLP10) and Port Solent (PLP11). The other site allocation policies are not replaced in the Addendum.
- Comments on the introduction to Chapter 5: Site Allocations have been largely addressed through the new Chapter 5: Site Allocations in the Portsmouth Pre-Submission Local Plan Addendum 2025.
- Some of the comments made relate to specific site allocations which are dealt with against those specific policies.
- A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.

Site Allocation Policy PLP10: Land West of Portsdown Technology Park

	Number of respondents
Total number of respondents	5
Respondents who raised soundness	2
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	0

A3.68 Respondents are in support of the development of Land West of Portsdown Technology Park, however, others have proposed some changes. One respondent has highlighted the need to improve transport links, both active and highway network, to the new site. A further comment flags that Fort Southwick has not been recognised as a Grade I listed building in the Plan and would like to see a Heritage Impact Assessment carried out with some proposed wording to paragraphs 5.11 and 5.17. Another change was suggested that a landscape design strategy and landscaping schemes should be required within PLP10.

A3.69 The following main issues were raised by the **site promoter Heritage Property Southern Limited** on Policy PLP10: Land West of Portsdown Technology Park:

- They support the allocation and confirm that their client proposes to bring forward the site for development within the 2025-2030 time period with a view to submitting a planning application in late 2025 / early 2026.
- Their client has worked to progress and validate their proposal for the site and has commissioned initial site-specific evidence on Transport and Landscape. Further technical assessments are underway, including in regards to Archaeology, Ecology and Development Viability.
- Regarding the Statement of Common Ground with the Council, which is nearing completion - subject to the finalisation of this document and the agreement of the proposed modifications to policy PLP10 as set in the draft statement, their client supports the proposed allocation of the site.

A3.70 The following main issues were raised by specific consultation bodies on Policy PLP10: Land West of Portsdown Technology Park:

- **Historic England** raise a number of issues on the allocation relating to heritage particularly that Fort Southwick is also a Grade I listed building and a proportionate heritage impact assessment would be beneficial to inform the approach to heights and massing on this site. They suggest the following changes:
  'i) Any new build development proposals for the site will respond positively to the presence of the following heritage assets:
  i. Fort Southwick (Scheduled Monument and Grade I Listed Building) and its setting; and
  ii. Any undesignated heritage assets within the site.
  5.11 There are a number of important heritage and nature conservation designations in close proximity to the site. The Scheduled Monument of Fort Southwick, which is also a Grade I listed building, is immediately adjacent to the western boundary whilst archaeological finds in the area date back to the Bronze...'
  '5.17 The site is located adjacent to Fort Southwick, which is a Scheduled Monument and Grade I listed building built (c.1860) as part of the Palmerston Portsmouth defences. The site has some archaeological potential for prehistoric and/or Roman remains with evidence of barrows and enclosures.'
- **Winchester City Council** consider the policy to be sound and are generally in support. They seek to retain land within its part of the former Portsdown Main site in predominantly open uses, remaining or reinstated as chalk downland, given its prominent location, openness and importance for the setting of Fort Southwick. The authorities have agreed this approach in a Statement of Common Ground.
- **Winchester City Council** suggest an amendment to criterion 2.g) with the following additional wording: 'Develop a landscaping scheme that positively enhances the contribution of the site and its surroundings to its prominent downland setting and provides navigable links to surrounding green infrastructure assets.'
- **Fareham Borough Council** support the inclusion of PLP10 and welcomes further opportunities for joint working.
- **Hampshire County Council** as the adjoining Local Highway Authority, request a minor modification to Policy PLP10 to improve the pedestrian and cycle routes to the site and link the employment site to the Hampshire local highway network including the B2177 corridor.

Site Allocation Policy PLP10: Land West of Portsdown Technology Park - Council response

How the representations have been taken into account:

- Policy PLP10: Land West of Portsdown Technology Park from the Portsmouth Pre-Submission Local Plan 2024 has now entirely been replaced with a new policy PLP10: Land West of Portsdown Technology Park in the Portsmouth Pre-Submission Local Plan Addendum 2025. Issues raised on this policy have largely been covered by the new policy.
- A statement of common ground has been prepared with the site promoter Heritage Property Southern Ltd (dated September 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- Statements of common ground have been prepared with Winchester City Council (dated August 2024 and October 2024) to address the issues they have raised.
- The Council has not taken forward comments by Hampshire County Council as it considers the policy criteria robustly address issues of accessibility.

Site Allocation Policy PLP11: Port Solent

	Number of respondents
Total number of respondents	7
Respondents who raised soundness	5
Respondents who raised legal compliance	4
Respondents who raised Duty to Cooperate	3

A3.71 Two respondents are concerned about the impact of development on nearby Portchester Castle and would like care to be taken over the heritage impact of any development particularly with reference to tall buildings spoiling the view to or from. One respondent is concerned about the possible negative impact on natural habitats (wetlands). One respondent would like to see cycleways improved/expanded in the area and no new motor vehicle access to be granted from Marina Keep.

A3.72 The following main issues were raised by **Premier Marinas Limited (represented by CBRE)** the site promoter for Port Solent on Policy PLP11: Port Solent:

- They consider the Policy to be legally compliant, sound and compliant with duty to co-operate.
- They broadly support Policy PLP11 of the Local Plan. They would like to see additional land-use flexibility to enable enhancement of the leisure/ commercial/ employment/ retail functions.
- They consider the potential deliverability of the site to be in excess of 500 homes, with a figure of 1,000 homes considered deliverable in 10 years.
- They seek continued engagement with the Council and relevant stakeholders to discuss the key supporting infrastructure, including flood defences that will help unlock the development of Port Solent.

A3.73 The following main issues were raised by specific consultation bodies on Policy PLP11: Port Solent:

- **Environment Agency** consider the policy to be sound, legally compliant and in compliance with duty to co-operate. They raise slight concern with the access and egress at Port Solent during a design flood event. The Environment Agency are satisfied that the SFRA Levels 1 and 2 adequately assessed and identified the risks. They want to ensure Portsmouth were confident that the movement of people can be safely managed prior to, and during a flooding event.
- **Fareham Borough Council (FBC)** acknowledge Port Solent brownfield site as an opportunity to meet a proportion of Portsmouth's housing need. FBC welcome that the policy acknowledges the coastline around the site is to be safeguarded for the delivery and management of any new flood defences. They highlight the importance of considering the impact of development on the significance of Portchester Castle and its setting and welcome the opportunity to be included as a consultee on any future development proposals.
- **Historic England** state that the policy refers to visual inter-visibility with Portchester Castle, but does not engage with impacts on heritage significance. They recommend adding a criterion similar to the protection afforded to Porchester Castle in Policy PLP3. Proposed wording: 'O) Protect viewpoints and the wider visual impact across Portsmouth Harbour, including the impact on Portchester Castle. <u>The design, scale and massing of the scheme needs to respond sensitively to the significance of Portchester Castle including its setting, taking into account its dominance in Portsmouth Harbour and the contribution made by views to and from the Castle to its significance'</u>
- **Historic England** also state that the approach needs to require a heritage statement from the applicant to recognise the heritage sensitivities and complement work required on visual impact assessments. Proposed wording: '5.39 The site also offers the potential for views out over Portsmouth Harbour and towards Porchester Castle. Where these views are currently achievable from public viewpoints all effort should be made to protect these. The application should be supported by a Landscape and Visual Impact Assessment to show how key viewpoints have been taken into consideration. This includes the protection of wider views, towards the site including from Portchester Castle and other key landmarks. <u>Any development proposals for the site should seek to understand the heritage significance of the Castle and its setting, through heritage impact assessment, and the scheme design respond sensitively to that significance.'</u>
- **Natural England** comment in regard to the Solent Wader & Brent Goose Strategy. They note that PLP11 contains policy wording suggesting that up to two seasons of bird survey may be required to determine if the allocation itself of land adjacent to it, constitute an area of significant supporting habitat. The allocation of the site as supporting habitat within the strategy already evidences that it is an area of significant supporting habitat. It is a requirement of the agreed SWBGS that should site classification be disputed, reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology, under appropriate habitat management conditions for waders and/or brent goose usage throughout the survey period.

A3.74 The following main issues were raised by general and other consultation bodies on Policy PLP11: Port Solent:

- **Residents Association of Port Solent (RAPS)** do not consider the policy to be sound. The representation questions the extent of the land that the policy is associated with.

They query the form that the homes would take and whether there was any further consideration of visitor parking (if some is to be lost) and supporting habitat for Brent Geese. RAPS also state that due to the constraints of the site, it is unlikely a developer would absorb the burden and risk.

- **RAPS** consider that the policy needs to reflect what is feasible given the many safeguards and stipulations. There is no specific alternative wording proposed. RAPS also wanted to see clearer statements about the interdependencies between PLP11 and adjacent policies (PLP3, PLP5 and PLP9), specifically any new link to Tipner West and potential for further visitor numbers to Port Solent.
- **RSPB** raise concerns regarding the policy wording associated with the protection of Solent Wader and Brent Goose Strategy (SWBGS) sites; these are sites beyond the boundary of the Solent Special Protection Areas (SPAs) that provide a supportive function for populations of species for which the sites are designated.
- **RSPB** state that the Plan has identified that Port Solent has sites of functionally linked land, mapped within the SWBGS, within or in close proximity to the allocation. It is therefore, important that Policy PLP11 appropriately reflects the agreed approach set out in PLP42 and the SWBGS in order to ensure no adverse effects on the integrity of the associated SPAs. The SWBGS sites identified within or in close proximity to Port Solent has been evidenced through survey effort over multiple years to inform the SWBGS. It is important to note, however, that the use of sites fluctuates particularly with the size of the Solent population of Brent Geese. In certain winters the number of juvenile Brent Geese can be relatively low and therefore recent surveys may not be representative of site usage by the geese in more productive years. The use of sites will also vary if the land use or management changes and recreational disturbance.
- **RSPB** notes that the SWBGS Mitigation Guidance (SWBGS Steering Group, 2019) document outlines that should site classification, and therefore, its function as supporting habitat to the SPA, be disputed reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period. In addition to the above, the SWBGS Mitigation Guidance provides additional wording around 'Candidate Sites', which have records of large numbers of waders or Brent Geese but have been recorded less than three times from 2006/2007 to present day. Therefore, in the particular case of Candidate Sites, further surveys are necessary to determine the classification of the site. Upon survey effort, it is likely that these sites will fall into the higher use categories, for example 'Core Area', 'Primary Support Area' and 'Secondary Support Area'. For some sites, where there has only been one survey to date, two years of data may be necessary.
- **RSPB** underline the key sections of each strategic site's policy wording which they do not consider appropriate. The SWBGS sites within or in close proximity to Port Solent have been well-evidenced through survey efforts as part of the original SWBGS survey, alongside an updated movement study, and ad-hoc additional records submitted (Whitfield, 2020). Therefore, the RSPB considers that these sites are already confirmed as areas of significant supporting habitat. If a development applicant for these strategic sites disputes these classifications, then reclassification should only be considered if confirmed by three consecutive years of survey to the agreed methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period.
- **RSPB** state that instead of effectively inviting developers to challenge the importance of sites forming part of the network of SWBGS sites, it would be far better to require applicants to gather further records of site usage by Brent Geese and/or waders (ideally

two survey seasons under 6 suitable habitat management conditions) to inform any necessary mitigation and/or avoidance measures.

- As currently worded, **RSPB** considers the policy approach of the strategic sites identified as including or lying within close proximity of SPA functionally linked sites identified within the SWBGS including Port Solent is misleading or contains omissions that do not reflect the guidance of the SWBGS and accordingly PLP42. The RSPB therefore does not consider these policies adequately provide the required level of protection that should be afforded to SPA functionally linked land and therefore is contrary to the Habitats Regulations.
- **RSPB** considers that in order for policy relating to SWBGS sites to grant the right level of protection afforded to functionally linked land to the Solent SPAs, and therefore, fully consider and adhere to the requirements of the Habitats Regulations, changes must be made in the wording relating to PLP11. Until such changes are made, the RSPB does not consider the draft Plan to be legally compliant or sound.
- **RSPB** suggest the following changes to paragraph 5.31: 'The developer needs to safeguard the integrity of the Portsmouth Harbour SPA and Solent and Dorset Coast SPA, Ramsar and SSSI site and nearby supporting habitats for overwintering birds. The developer should provide evidence that the allocated site will not result in the loss of or damage to habitat that is functionally linked to Solent's SPAs / Ramsars (Core Areas P48A and B and Primary Support Area P48C). ~~To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat.~~ An additional 500 dwellings at this site has the potential to increase direct recreational impact on these habitats and cause disturbance to overwintering birds using the SPA and supporting habitats in particular. Non-breeding bird surveys between October and March (typically two survey seasons under suitable habitat management conditions) may be required to inform the detailed design of suitable mitigation and / or avoidance measures to ensure that the development does not result in adverse effects on site integrity. Mitigation should be sought in accordance with the Solent Waders and Brent Goose Strategy and a project level HRA and EIA will be required for any planning applications at Port Solent. ~~If the site is found to be functionally linked to Habitats sites, mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity.~~'
- **Portsmouth Cycle Forum (PCF)** propose that: Policy PLP11 could be improved with criterion h) seeking to improve access from Port Way which has substandard cycle lanes, and via the Public Right of Way on Lock Approach/Lock View which is currently not legally available to people cycling, and is not accessible for all users. This route is much shorter than Port Way for people heading to and from Fareham and has less traffic. PCF want to see the policy map show both routes from the site to the A27.
- **PCF** also raise concern about the flooding at the access to the Paulsgrove Recycling Centre and would like to see this addressed. They would also like to see Port Way improved to provide segregated cycle lanes and the speed limit reduced from 30 to 20. PCF would like to see the Local Plan commit to object to any new motor vehicle access from Marina Keep.
- **PCF** flag that Portchester is misspelt within the document.

Site Allocation Policy PLP11: Port Solent - Council response

How the representations have been taken into account:

- Policy PLP11: Port Solent from the Portsmouth Pre-Submission Local Plan 2024 has now entirely been replaced with a new policy PLP11: Port Solent in the Portsmouth Pre-Submission Local Plan Addendum 2025. Issues raised on this policy have largely been covered by the new policy.
- A statement of common ground has been prepared with Premier Marinas Limited and USF Nominees Ltd c/o CBRE IM (dated October 2024) to address the issues they have raised.
- A statement of common ground has been prepared with the Environment Agency (dated October 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- In response to the representation from PCF, incorrect spellings of Portchester Castle have been corrected. No change has been made in respect of their request for more specific details on upgrading cycle lanes and improving access as the Council considers that such matters are sufficiently covered by Policy PLP11 and Policy PLP47: Movement and Transport. The Council considers that PCF's concerns about the Paulsgrove Recycling Centre are sufficiently addressed through Policy PLP9: Horsea Island Strategic Open Space from the Portsmouth Pre-Submission Local Plan Addendum.

Site Allocation Policy PLP12: St John's College

	Number of respondents
Total number of respondents	3
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.75 Only three respondents made comments. Coastal Partners point out that there is a residual risk of flooding despite completion of the Southsea Coastal Scheme. Network Rail are supportive of the implementation of sustainable travel measures and would like it to focus on convenient access between the site and Portsmouth and Southsea rail station. Historic England would like historic assets to be expanded to include heritage assets on the site.

A3.76 No representations were received from the site promoter of St John's College on Policy PLP12: St John's College.

A3.77 The following main issues were raised by specific consultation bodies on Policy PLP12: St John's College:

- **Network Rail** support the site allocation at part 2.j) to encourage the implementation of sustainable travel measures and mitigations to better connect the site with public transport.
- **Historic England** support the policy and suggest a minor amendment to ensure clarity in the intention to connect with all heritage assets, not just those of historic asset (e.g. at the exclusion of archaeological assets). They suggest the policy should: 'Retain, restore, and where possible enhance the fabric and setting(s) of any historic heritage assets on the site, as shown in figure 5.4.'

A3.78 The following main issues were raised by general and other consultation bodies on Site Allocation Policy PLP12: St John's College:

- **Coastal Partners** flag that residual risk remains for wave overtopping of defences or extreme tidal flooding exceeding the standard of protection provided by the new defences.

Site Allocation Policy PLP12: St John's College - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with Southsea Village Limited - site promoter of St John's College (dated August 2024). They made no representations on the Portsmouth Pre-Submission Local Plan 2024.
- A statement of common ground has been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- To ensure clarity, the Council has proposed changes to criteria 2.b) in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to comments made by Historic England. A statement of common ground has also been prepared with Historic England (dated 2025) to address the issues they have raised.
- The comments from Coastal Partners are noted, however, the Council considers that further specific policy criteria related to flood risk are not required as this is already covered by the general flood risk policies.

Site Allocation Policy PLP13: Fraser Range

	Number of respondents
Total number of respondents	9
Respondents who raised soundness	8
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	1

A3.79 One response concerns ensuring the developer provides mitigation evidence for any natural habitat loss at the site (or negative impacts in the surrounding area).

A3.80 All other responses state that the policy was not consulted upon under Regulation 18 and that this Local Plan suggests no representations about the scheme were received, when in fact no one had been consulted on it, so would be unlikely to have

submitted any representations. One also questions the use for residential development rather than enhancement of the seafront's leisure and culture attractions (stated use in 2021 Local Plan).

A3.81 No responses were received from the landowner promoting Fraser Range.

A3.82 The following main issues were raised by specific consultation bodies on Policy PLP13: Fraser Range:

- **Environment Agency** find the policy sound and legally compliant. They comment that in relation to issues within their remit they have no soundness issues with this proposed allocation however they did provide the following comments to clarify their position. They raised slight concern with the access and egress at Fraser Range during a design flood event. The Environment Agency were satisfied that the SFRA Levels 1 and 2 adequately assessed and identified the risks. They want to ensure Portsmouth are confident that the movement of people can be safely managed prior to, and during a flooding event.
- **Environment Agency** raise concern that the recently approved planning application failed to demonstrate that dry or limited depths of flooding to access routes were achievable. The robust assessment and understanding of wave overtopping and breach risk will be of paramount importance when determining the infrastructure required to reduce the risk of flooding to a safe level. They are therefore, pleased to see the inclusion of these requirements, including suitable freeboard calculations.
- **Historic England** consider the policy to be unsound, principally because it refers to Fort Cumberland as Grade II rather than II*. There is a significant difference between these gradings and so this detail matters. They do note though that this may be a typographical error. They also note that 2f should refer to Scheduled Monuments not Scheduled Ancient Monuments, thus aligning with national policy. In consequence of this, they recommend the following amendments to criterion 2f):

  'f) Any new build development proposals for the site must respond positively to the presence of the following heritage assets:

  - Fort Cumberland (Scheduled ~~Ancient~~ Monument and Grade II* listed);

  Ii. World War II Anti Tank Defences (Grade II listed); and

  Iii. Any undesignated heritage assets within the Range site including where possible the remains of any gun emplacements on the eastern part of the site that shall be retained and their significance and setting conserved.'

  They also highlight that paragraph 5.57 suggests updating is needed.
- **Natural England** commented in regard to the Solent Wader & Brent Goose Strategy. They note that PLP13 contains policy wording suggesting that up to two seasons of bird survey may be required to determine if the allocation itself of land adjacent to it, constitute an area of significant supporting habitat. The allocation of the site as supporting habitat within the strategy already evidences that it is an area of significant supporting habitat. It is a requirement of the agreed SWBGS that should site classification be disputed, reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology, under appropriate habitat management conditions for waders and/or brent goose usage throughout the survey period.

A3.83 The following main issues were raised by general and other consultation bodies on Policy PLP13: Fraser Range:

- **Milton Neighbourhood Forum** raise concern over the insufficient capacity at a location they provide an image of being exacerbated by the allocation of Fraser Range which will rely upon the road space in said image. It seems to be assumed that the conditional consent for that same number of homes can be complied with. The site was not included for residential use in the Regulation 18 Local Plan, where the Seafront Policy S8 is for the promotion of regeneration opportunities to enhance the seafront's leisure and culture attraction for local residents and visitors alike.
- **Coastal Partners** suggest additional wording for paragraph 5.66, adding 'In addition to responsibility for the long-term management and maintenance of these defences over the lifetime of the development.'
- **RSPB** raise concerns regarding the policy wording associated with the protection of Solent Wader and Brent Goose Strategy (SWBGS) sites; these are sites beyond the boundary of the Solent Special Protection Areas (SPAs) that provide a supportive function for populations of species for which the sites are designated.
- **RSPB** state that the draft Plan has identified that Fraser Range has sites of functionally linked land, mapped within the SWBGS, within or in close proximity to the allocation. It is therefore, important that Policy PLP13 appropriately reflects the agreed approach set out in PLP42 and the SWBGS in order to ensure no adverse effects on the integrity of the associated SPAs. The SWBGS sites identified within or in close proximity to Fraser Range has been evidenced through survey effort over multiple years to inform the SWBGS. It is important to note, however, that the use of sites fluctuates particularly with the size of the Solent population of Brent Geese. In certain winters the number of juvenile Brent Geese can be relatively low and therefore recent surveys may not be representative of site usage by the geese in more productive years. The use of sites will also vary if the land use, management changes, and/level of recreational disturbance changes.
- **RSPB** note that the SWBGS Mitigation Guidance (SWBGS Steering Group, 2019) document outlines that should site classification, and therefore, its function as supporting habitat to the SPA, be disputed reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period. In addition to the above, the SWBGS Mitigation Guidance provides additional wording around ‘Candidate Sites’, which have records of large numbers of waders or Brent Geese but have been recorded less than three times from 2006/2007 to present day. Therefore, in the particular case of Candidate Sites, further surveys are necessary to determine the classification of the site. Upon survey effort, it is likely that these sites will fall into the higher use categories, for example ‘Core Area’, ‘Primary Support Area’ and ‘Secondary Support Area’. For some sites, where there has only been one survey to date, two years of data may be necessary.
- **RSPB** note that other strategic sites with the potential to impact a higher classification (i.e. Core Area, Primary Support Area, Secondary Support Area, Low Use) of SWBGS site including PLP13. Specific policy wording has been provided as follows for para 5.63, p.111: ‘The developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent’s SPAs / Ramsars. These are the Primary Support area P78 and P142 and the Low Use site P144 both of which are located on the beach adjoining the site. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat.’

- **RSPB** has underlined the key sections of each strategic site's policy wording which they do not consider appropriate. The SWBGS sites within or in close proximity to Fraser Range have been well-evidenced through survey efforts as part of the original SWBGS survey, alongside an updated movement study, and ad-hoc additional records submitted (Whitfield, 2020). Therefore, the RSPB considers that these sites are already confirmed as areas of significant supporting habitat. If a development applicant for these strategic sites disputes these classifications, then reclassification should only be considered if confirmed by three consecutive years of survey to the agreed methodology under appropriate habitat management conditions for waders and/or Brent Goose usage throughout the survey period.
- **RSPB** states that instead of effectively inviting developers to challenge the importance of sites forming part of the network of SWBGS sites, it would be far better to require applicants to gather further records of site usage by Brent Geese and/or waders (ideally two survey seasons under 6 suitable habitat management conditions) to inform any necessary mitigation and/or avoidance measures.
- As currently worded, **RSPB** considers the policy approach of the strategic sites identified as including or lying within close proximity of SPA functionally linked sites identified within the SWBGS including Fraser Range is misleading or contains omissions that do not reflect the guidance of the SWBGS and accordingly PLP42. The RSPB therefore, does not consider these policies adequately provide the required level of protection that should be afforded to SPA functionally linked land and therefore is contrary to the Habitats Regulations.
- **RSPB** considers that in order for policy relating to SWBGS sites to grant the right level of protection afforded to functionally linked land to the Solent SPAs, and therefore, fully consider and adhere to the requirements of the Habitats Regulations, changes must be made in the wording relating to PLP5. Until such changes are made, the RSPB does not consider the Draft Plan to be legally compliant or sound.
- **RSPB** suggests the following changes to paragraph 5.63: 'The developer should provide evidence that the allocated site will not result in the loss of or damage to habitat that is functionally linked to Solent's SPAs / Ramsars. These are the Primary Support area P78 and P14295 and the Low Use site P144 both of which are located on the beach adjoining the site. ~~To demonstrate this, n~~Non-breeding bird surveys between October and March (typically two survey seasons under suitable habitat management conditions) may be required ~~to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally linked to Habitats sites~~, inform the detailed design of suitable mitigation and / or avoidance measures will be required, and the planning application will need to be supported by a bespoke Habitats Regulations Assessment to ensure that the development does not result in adverse effects on site integrity. Advice received from Natural England in December 2023 and April 2024 stated that the development of Fraser Range may also have an 'alone' impact on the functionally linked habitat and that it is likely to require site specific mitigation over and above the contributions to the Solent Recreation Mitigation Strategy. Evidence of how this mitigation will be achieved will need to be provided by the developer and agreed by PCC.'
- Five individuals commented that the policy was not consulted on at Regulation 18. This is an entirely new policy, and the key changes from Regulation 18-19 document incorrectly identifies the site as on the south western corner of Portsea Island, with no representations having been made. The public and stakeholders were unlikely to comment on a policy that had not been consulted upon. The public had been consulted on a Seafront Masterplan adopted in March 2021. It was referred to in the Regulation 18

Local Plan under Policy S8 where it said 'The Council will use the Seafront Masterplan SPD and the Seafront Strategy to guide and inform investment and development of publicly and privately owned assets and land.' They question why the public would be expected to make any further comments under Regulation 18 when the LPA had confirmed the Masterplan had generated 1,268 responses.

- Six individuals point out that paragraph 5.57 states that Fraser Range is subject to a current planning application (ref 19/00420/FUL). According to PCC's website there were 141 Objections to the Application for 134 new homes and spaces for 224 cars with only 5 in Support. The application is subject to 38 Conditions including an asset condition and management plan; a beach management plan; assessments of residual risk of flooding; a flood risk assessment; flood warning and emergency plans etc. The site is located at the Langstone Harbour entrance and the beach is highly vulnerable to strong ebb and flood tides undermining Fraser's sea defences. The correspondence provided from the Environment Agency dated 23rd February 2024, and the undated note from Coastal Partners referring to Flood Risk Assessments, Management Plans and a Summary Statement of January 2024 emphasise the need for certainty on future beach management as well as on sea defence structures. The EA's letter advised the withdrawal of their objection was conditional upon an acceptable beach management regime being imposed. They also had no knowledge of whether the proposed development was insurable. They can see no reference in PLP13 to the beach management obligations, either in Policy or supporting text. They can see no reference as to how the Authority is to secure the management and maintenance of the sea-defences over the lifetime of their use. They see no benefit in allocating land for a highly vulnerable use in such a vulnerable location when it is uncertain the extensive Planning Conditions under 19/00420/FUL can be complied with. As such the Policy is unsound. All six asserted that Policy PLP13 should be deleted for lack of certainty around safety and viability.
- One respondent commented that the developer should provide evidence that the allocated site will not result in the loss of habitat that is functionally linked to Solent's SPAs / Ramsars. These are the Primary Support area P78 and P142 and the Low Use site P144 both of which are located on the beach adjoining the site. To demonstrate this, non-breeding bird surveys between October and March (typically two survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat.

Site Allocation Policy PLP13: Fraser Range - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with Orangestar Capital (Portsmouth) Ltd (dated January 2024), represented by Pearce Planning Limited (agent acting on behalf of the landowner of Fraser Range). They made no representations on the Portsmouth Pre-Submission Local Plan 2024.
- A statement of common ground has been prepared with the Environment Agency (dated October 2024) to address the issues they have raised.
- In response to comments from Historic England, the Council has proposed amendments to criterion 2.f) and to para 5.57 in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has also been prepared with Historic England (dated 2025) to address the issues they have raised.
- In response to comments from Natural England and RSPB, the Council has proposed some changes to para 5.63 in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has also been prepared jointly with RSPB and HIWWT to address the issues they have raised.
- Milton Neighbourhood Forum made general comments which do not require changes to Policy PLP13: Fraser Range. A statement of common ground has been prepared with Milton Neighbourhood Forum (dated August 2024) to address the issues they have raised.
- In response to comments from Coastal Partners, the Council has proposed an amendment to paragraph 5.66 in the Schedule of Changes to the Pre-Submission Local Plan 2024.
- Some individuals requested that the policy be deleted for lack of certainty around safety and viability. The site allocation will contribute much needed housing to the City and an array of other socio-economic and environmental benefits, including a new sea wall flood defence and safe routes for sustainable modes of transportation around/through the site. Therefore, the Council does not consider it appropriate to delete the policy from the emerging Portsmouth Local Plan. Concerns around viability have been addressed in the statement of common ground with Orangestar Capital (Portsmouth) Ltd, the landowner of Fraser Range.

Site Allocation Policy PLP14: The News Centre, Hilsea

	Number of respondents
Total number of respondents	4
Respondents who raised soundness	3
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.84 Most responses concern the land use of the northern parcel of land. Vail Williams on behalf of First Hampshire & Dorset Ltd (First) would like it to be designated mixed use as there is a need for more employment land generally across the area and it was previously an employment site. They cite that small plots within the planned

residential area are not attractive or suitable for small-scale commercial or community uses because the ground floor areas could be at risk of flood. There is also concern that the exact number of homes that can be built on the site cannot be set in stone at this time and that the total should therefore be flexible or within a range to allow for any unknown site constraints.

A3.85 One respondent mentions the need to do a full transport assessment on the northern parcel to ensure no negative impact on the Strategic Road Network (SRN).

A3.86 The following main issues were raised by **First Hampshire & Dorset Ltd (represented by Vail Williams LLP)** on Policy PLP14: The News Centre, Hilsea:

- They support the allocation of the all-electric bus depot, and the principle of development on the site.
- They state that there has been market interest in the site for commercial development, but not residential use. The allocation should be broadened from residential-led development for the northern parcel, to include employment uses, specifically provision for small businesses and industrial uses (use classes E(g)(ii and iii), B2 and B8), subject to justification through the planning application process. This would ensure suitable flexibility to the market.
- They raise the issue of soundness as the policy is not positively prepared to provide flexibility for meeting the area's need, as outlined in evidence documents from LSH and Iceni, it is not justified as it has not taken into account reasonable alternatives based on the market.
- The history of the site as a local employer should be considered with regards to future employment operation of the site, and the loss of an existing employment use should be considered, with regards to the bus depot planning application 23/01470/FUL.
- Request that the policy includes flexibility on the number of homes allocated (100), subject to site constraints and detailed design.
- The site's location in a flood risk area means residential development is likely to be unacceptable on the ground flood and this is not clear in the policy.
- Support ancillary uses for community and commercial purposes but point to lack of viability and feasibility of such uses, based on unsuccessful attempts to market similar units at South Down View (adjacent to the News Centre).

A3.87 The following main issues were raised by specific consultation bodies on Policy PLP14: The News Centre, Hilsea:

- **Historic England** contend that the policy is unsound because it does not mention the setting of historic assets, such as Hilsea Lines Scheduled Monument. They believe these should be in the policy itself, and not just supporting text, as included. They go on to state that proportionate heritage impact assessment would help inform the policy approach.
- **Historic England** argue that there should be reference to the setting of nearby heritage assets in the policy and propose an amendment at criterion 3.c) as follows:
  '3 c) The design of the site should seek to respond to and celebrate distinct elements of the original building's historic presence and architecture <u>and respect the setting of nearby heritage assets</u>.'
- **Historic England** also contend that paragraph 5.76 of the Plan should make explicit reference to Hilsea Lines being a Scheduled Monument, as one of a number of sensitive

archaeological and historic assets referred to. They propose the following amendment to paragraph 5.76:

'5.76 Historic Environment Records show close proximity of the site to a number of sensitive archaeological and historic assets, including the Hilsea Lines Scheduled Monument and a number of Listed Buildings. The setting of these assets should be considered as part of the design of any development of the site.'

- **National Highways** contend that no part of the northern parcel of the site has been subject to traffic modelling, and has not be subject to their comments on future proposals. Future proposals should be supported by transport assessments and ensure safe and efficient operation of the SRN with appropriate mitigation.

A3.88 The following main issues were raised by general and other consultation bodies on Policy PLP14: The News Centre, Hilsea:

- A neighbouring resident is highly supportive of the new electric bus depot at the site, to make Portsmouth greener.

Site Allocation Policy PLP14: The News Centre, Hilsea - Council response

How the representations have been taken into account:

- No change is considered necessary in response to comments from First Hampshire & Dorset Ltd (represented by Vail Williams LLP), as the Council considers the policy to be flexible regarding the types and quantum of uses proposed for the site, particularly for the northern parcel. Since their representation on the Portsmouth Pre-Submission Local Plan 2024 was made, there has been developer interest expressed for the northern parcel of the site for residential land use, details of which can be found in the statement of common ground with City & Regional Ltd (dated November 2025).
- In response to comments from Historic England, the Council has proposed amendments to criterion 3.c) and paragraph 5.76 in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has also been prepared with Historic England (dated 2025) to address the issues they have raised.
- No change is considered necessary in response to the comment from National Highways regarding the need for transport assessments as this is covered by Policy PLP47: Transport. A statement of common ground has been prepared with National Highways to address the issues they have raised.

Site Allocation Policy PLP15: Somers Orchard

	Number of respondents
Total number of respondents	2
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.89 One comment from Network Rail requests the submission of a Travel Plan and Transport Assessment to be added to the wording. They are particularly interested in convenient access between the site and Portsmouth and Southsea rail station.

A3.90 No response was received from the **site promoter PCC Housing Revenue** on Policy PLP15: Somers Orchard.

A3.91 The following main issues were raised by specific consultation bodies on Site Allocation Policy PLP15: Somers Orchard:

- **Network Rail** consider a Travel Plan and Transport Assessment should be submitted to assess the potential transport impacts of the development and propose mitigation and identify opportunities for sustainable transport initiatives, focussed on providing access to/from Portsmouth and Southsea rail station.
- **Historic England** object to the requirement for tall buildings and high-density blocks, given the allocation's position between two conservation areas and lying outside the 'preferred areas' of PLP1. They note the Listed Buildings and Conservation Areas Act 1990 must be complied with.
- **Historic England** note the reference to the planning application expected in Autumn 2023 should be updated.
- **Historic England** object to criterion 2f of the policy which requires 'tall buildings and high density blocks.' There are various ways to achieve high density, which do not all require tall buildings. The site lies outside the Councils proposed opportunities area for tall buildings (thus the proposed policy approach would conflict with PLP1), and rightly so, as it lies immediately between two conservation areas. The character of the Terraces and King Street could potentially be harmed by a blanket requirement for tall buildings.
- **Historic England** request the following amendment to Policy 2f:
  'Includes ~~tall buildings~~ and high density blocks in order to achieve the densities needed to meet the required level of housing.'

A3.92 No main issues were raised by general or other consultation bodies on Site Allocation Policy PLP15: Somers Orchard.

Site Allocation Policy PLP15: Somers Orchard - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with PCC Housing Revenue Account (dated June 2024) as site promoters of Somers Orchard. They did not submit representations on the Portsmouth Pre-Submission Local Plan 2024.
- The comment by Network Rail regarding travel plans and transport assessments is covered by the transport policies in the infrastructure chapter, so no change is considered necessary. A statement of common ground has been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.

Chapter 6: Homes

	Number of respondents
Total number of respondents	5
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.93 Several comments with different views haven been made. Portsmouth International Port and Fareham Borough Council simply present what they are doing in this area i.e. shortly submitting an updated version of the masterplan and ensuring provision of 800 homes to meet part of Portsmouth's unmet housing needs as part of their Local Plan 2037. Others point out difficulties in the housing plans, for example, there is a lack of physical capacity or infrastructure to meet the target, not enough thought has been given to refurbishment of older housing stock, and the current policy agenda around HMOs discourages investment in some older properties that could be made financially viable through the addition of another storey. One respondent comments that the provision of new high quality specialist accommodation for older people with caring needs could attract inward migration of elderly people from elsewhere rather than serving local communities. The new MP for Portsmouth South notes the new Government's desired commitment to getting homes built and would like developments on urban brownfield sites to be prioritised and fast-tracked.

A3.94 The following main issues were raised by specific consultation bodies on Chapter 6: Homes generally:

- **Fareham Borough Council** acknowledge the challenge PCC face with regard to meeting the City's standard method-derived housing need and sets out the cooperative working relationship between the two authorities which led to the Fareham LP making provision of 800 homes in its Local Plan to meet PCC's unmet housing need. They reference the 2024 Statement of Common Ground between the two authorities which sets out the joint commitment to continue to work collaboratively to address cross boundary matters.

A3.95 The following main issues were raised by general consultation bodies on Chapter 6: Homes generally:

- **Stephen Morgan, MP** highlights a number of issues for constituents, linking to the failure to deliver homes and accompanying infrastructure. He outlines the new Government's intention to fix this issue through an overhaul of the planning system including mandatory housing targets and reviews to identify grey belt. As one of the most densely populated LAs outside London, it is vital the Local Plan takes a brownfield first approach, prioritising development of previously used land and fast-tracking approval of urban brownfield sites, rather than building on much-loved green spaces. Local leadership must work with the Government to plan new housing in the best possible places, with the supporting infrastructure, public services and green spaces residents need, through local plans which gives local communities an opportunity to shape housebuilding in their area. Urges the Council to deliver these plans for 'Portsmouth people'.
- **Milton Neighbourhood Forum** question the Council's housing target in light of the 1.4% population growth in the City from 2011 to 2021 and state that the inability to create more

than 10,800 homes in the last 18 years is not the LPA's fault, but is due to a lack of physical capacity and infrastructure.

- **Friends of Old Portsmouth Association** consider the Plan unsound due to lacking definitions and policy approaches for different groups of people. They state that older people are assumed to mean those aged 60+, and point to a growing category of newly-single middle aged people. They state that co-living/ HMOs are not appropriate where children are involved. They also highlight the lack of reference to Airbnb accommodation and their classification and management.
- **Portsmouth and District Private Landlords Association (PDPLA)** state that a deficiency in the Local Plan is the large number of older properties that do not meet 21st Century building standards and which will continually decline in condition, and become harder to address.
- **PDPLA** refer to the private rented sector investing and renovating dilapidated and obsolete commercial buildings, including adding third floor roof space. They state this is actively discouraged through the current policy agenda, particularly of HMOs, and this makes it impossible to attract investment for the buildings that need it most. They state that slowing and preventing decay of housing stock should be part of providing suitable residential uses to meet current and future demand.

Chapter 6: Homes - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with Fareham Borough Council (dated July 2024) as referenced in their representation.
- A number of comments are about the Government's approach to housing targets rather than the Council's approach, no change is considered necessary in response to those.
- The Council has considered all available brownfield sites in considering sites suitable for being allocated for housing.
- The Portsmouth Local Plan is supported by an Infrastructure Delivery Plan which explains how the infrastructure necessary to support the proposed level of development in the Local Plan will be provided.
- The Local Plan proposes housing for families as well as single people, and older people, so no change is considered necessary in relation to the comment from Friends of Old Portsmouth Association.
- No change is proposed in response to PDPLA's comment that the Local Plan does not address the fact Portsmouth has an ageing housing stock. The Local Plan includes proposals for new housing, and redevelopment of existing sites.

Strategic Policy PLP16: Housing Target

	Number of respondents
Total number of respondents	15
Respondents who raised soundness	9
Respondents who raised legal compliance	8
Respondents who raised Duty to Cooperate	8

A3.96 Views are divided on whether the housing target is too low or too high. Mainly respondents think the target should be higher because of the proposed new standard method calculation that the Government consulted on in summer 2024, and the proposed change in national planning policy. Most respondents recognise the complexities of Portsmouth's geography (an island, restricted area, protected coastline, densely populated, chalk escarpment to the north). Some think these restrictions should be evidenced more strongly in the Local Plan to provide weight to the 680 home target as being the correct one, while others think that it is no reason not to be more ambitious, and push for maximisation of affordable housing on the sites identified as well as use of brownfield sites wherever possible.

A3.97 Other concerns mentioned are making sure infrastructure keeps up with the additional housing, including sewerage, and that the housing shortfall threatens greenfield sites outside of Portsmouth.

A3.98 The following main issues were raised by specific consultation bodies on Policy PLP16: Housing Target:

- **Winchester City Council** highlight that completions for the 2020-23 period (Table 6.1) only relate to sites of 5 dwellings or more, and given that para 6.15 notes that small sites have been a significant and consistent part of housing supply, the omission of sites of less than 5 dwellings does not seem justified. Hampshire County Council monitoring data suggests total net completions were 100 dwellings higher for this period than shown in Table 6.1.
- **Winchester City Council** question the 15% non-implementation discount, which para 6.13 explains applies to HELAA sites, but should be applied to any site included in the Reg 19 Plan. All sites need to be deliverable and it does not seem justified to apply a discount to planning permissions. Given the Plan's inability to meet the standard method housing need, this modest estimate does not appear to reflect a positively prepared plan.
- **Winchester City Council** flag that the lower end of the capacity range for Tipner West and Horsea Island East has been used, and given the Plan is unable to meet standard method housing need and is asking neighbouring authorities to help, this modest estimate does not reflect a positively prepared plan. They also indicate that several other strategic sites include residential and commercial elements, and while the economic elements of the plan are acknowledged, the scale of housing could be increased to help address the under-provision of housing proposed.
- **Winchester City Council** question whether the Local Plan has left "no stone unturned" in seeking to meet housing needs in full, and ask the Inspector to explore whether more housing could be achieved. They do not conclude that the Policy is unsound due to lack of familiarity with housing supply in Portsmouth, but they raise the concern that potentially over 1,000 dwellings appear not to have been taken into account. This directly affects unmet need that WCC will be asked to contribute to meeting.
- **Southern Water** summarise the housing supply of at least 13,603 net additional homes for the Plan period derives from strategic site allocations and site allocations in the Local Plan, but will also include: sites from the 2023 HELAA with a 15% non-implementation discount applied (comprising of small/medium sites less than 1ha with capacity for 5 or more dwellings as identified in Appendix 2 of the Plan, and sites of more than 1ha with capacity for 5 or more dwellings as identified in Appendix 3 of the Plan). They flag that the Council have not undertaken a capacity assessment in relation to these additional developments, and therefore, propose that the following wording is included in criterion e. of the Policy:

"Any development of over 50 dwellings will require a wastewater network capacity assessment as part of the planning process. Where capacity constraints are identified, phasing of the occupation of the development may be required to align with the delivery of upgrades to sewerage infrastructure, this is to ensure that adequate capacity is available to accommodate the number of dwellings. This phasing would be done in liaison with the service provider."

- The **NHS ICB** highlight the recent changes in Government and increased housing targets (which the Plan was produced in advance of) and states they will be interested to see how this affects the final submission version Local Plan, as it will increase the burden further.

A3.99 The following main issues were raised by general and other consultation bodies on Policy PLP16: Housing Target:

- **New Forest District Council** highlight that the Plan's housing target compared to standard method need (at 899 dpa) leads to significant and rising (at 1,098 dpa as proposed under the new standard method) unmet need. They note the City's constraints and point to ongoing discussions on helping to meet unmet need with neighbouring authorities in southeast Hampshire.
- **Southampton City Council (SCC)** consider the Plan's housing target to be sound, accounting for the City's constraints, and the findings of its HEDNA and HELAA. The representation states that the capacity-based target is justified, and is supported by continuous engagement around meeting unmet need with neighbouring authorities. These discussions are part of a coherent and interconnected cross-boundary approach to housing delivery.
- **Southampton City Council** support PCC's use of a capacity-based target, but they refer to the proposed changes to the NPPF, which, if put in place, would lead to a substantially increased housing need for Portsmouth and a slight reduction for Southampton, noting that Southampton still may not be able to meet its need in full within its boundaries. SCC note that it may be necessary for Portsmouth to review its housing target in line with the revised housing need calculations if and when formally adopted, but support the continuing use of the current standard method until any Government instruction or transitional arrangements indicate otherwise. SCC will continue to work with PCC on strategic issues such as housing need and delivery.
- **Amanda Martin MP** highlights the new Government's intention to kickstart homebuilding by reforming the planning system to deliver 1.5m homes, to tackle affordability, high rents, home-ownership and homelessness. Although the proposed changes are subject to consultation, Portsmouth Council should be ambitious in getting ahead of the changes, to avoid instability and to save time and money having to go through a transitional period to accommodate revised targets. The Plan is currently poor in falling short of the current standard method, and would fall even shorter of the new target.
- **Amanda Martin MP** goes on to highlight the importance of adequate infrastructure, high quality public realm and affordable homes. She states that while important consideration must be given to protecting the environment, this must not restrict our ambitions on homebuilding. Productive partnerships with stakeholders such as the Environment Agency can ensure balance is achieved. There is a need to ensure public and private investment partnerships are utilised effectively. Delivery of new affordable homes supported by the right infrastructure will vastly improve the quality of life for generations to come.

- **Stephen Morgan MP** highlights the City's recent low level of housing delivery, lower than the housing targets from the 2012 Portsmouth Local Plan, the new Local Plan target from 2020, and the 2024 draft Local Plan.
- **CPRE** acknowledge the challenges of local plan-making and states that PCC have undertaken a thorough investigation of all available sites in the City, which informs its housing target of 13,603 homes or 680 dpa. This is a significant shortfall in relation to Standard Method need of 899 dpa, which has major implications for surrounding countryside areas.
- **CPRE** state that PCC has not taken the opportunity to produce more compelling evidence to justify exceptional circumstances to demonstrate that 680 dpa is the correct target. They explore the 'Policy off' position that is assumed by the Standard Method and detail sustainability and capacity related constraints that meet Standard Method growth 'are physically impossible to fit into the unique island city'. This includes detail on the City's residential density, flood risk and coastal change, protection of designated habitats and much needed urban parks and green space. Various parts of the NPPF consultation (2024) mention hard constraints that justify planning for a lower [housing] number, and clearly future thinking must allow for these circumstances to be taken into account.
- **Premier Marinas** contend that the plan is unsound, as part of delivery of the Council's housing target through strategic sites and allocations, residential development at Port Solent Marina has potential for 1,000 new homes (minimum of 500 homes) subject to masterplanning and technical feasibility. There is also scope to deliver circa 12 new homes at Southsea Marina, not currently reflected in the housing trajectory. This could help reduce pressure on larger strategic sites to deliver large scale sustainable growth.
- The **HBF** consider the Plan unsound, being inconsistent with national policy as it lacks necessary clarity regarding unmet housing needs. They highlight that the capacity-based requirement falls circa 3,500 homes short of the standard method figure, and whilst they recognise that PCC is constrained, the Council will need to be able to justify the exclusion of any sites submitted for development.
- The **HBF** acknowledge that 800 homes will be provided in Fareham to address some unmet needs, but they are disappointed that the remaining unmet need has not been addressed in neighbouring areas. Whilst they recognise that evidence presented suggests active engagement on the issue, it is troubling that this has not led to further homes being identified to meet need in full. In order to support future co-operation on this matter, the Local Plan should include a clear statement as to the number of homes required to meet unmet needs. It is suggested by the HBF that this is done by amending section 2 of the policy.
- The **HBF** considers how housing need has been dealt with in the Plan, referencing the Council at paragraphs 6.10 of the Plan and 3.16 of the Duty to Cooperate Statement, which say that the housing requirement in the plan exceeds the 655 dpa suggested by the HEDNA as being required to meet future housing needs in full. However, they then refer to paragraph 3.16 of the Duty to Cooperate Statement, which acknowledges that the Council does not consider there to be exceptional circumstances to support an alternative method for assessing housing need, which the HBF agrees with. The level of housing need set out in the HEDNA is much lower than that arrived at by applying the proposed standard method in the latest draft of the NPPF which would result in a housing need for Portsmouth of 1,098 homes.
- The **HBF** highlight that whilst a housing trajectory is included in the HELAA, it is not included in the plan itself, as required by the NPPF para 75. The HBF recommends the Council revisit the evidence supporting the trajectory, to provide annualised trajectories

rather than the 5 year tranches provided, which do not include sufficient detail. It is unclear whether allocated sites will commence at the start or end of these periods. This is key to the robustness of the Council's housing supply and five year land supply. They reserve the right to comment on the updated trajectory at the examination.

- Two individuals (J Beresford, and L Vickerman) contend that the Plan is unsound and contrary to the Duty to Cooperate due to ambiguity and lack of clarity about the definition of a dwelling, and how HMOs are counted in the City's housing supply, relating to wording in specific planning applications and states this will lead to more HMOs within a 50m radius over time. This relates to para 6.16 (and also to PLP20).
- Two individuals (I Haskell and M Haskell) state that (regarding PLP16.1.g) HMOs are not affordable housing and rents for these types of properties are commercially inflated. They suggest that PCC will end up paying for this as emergency housing. The fact that large amounts have been permitted/ delivered is not a sound or justified argument. They suggest that the City has been targeted by property developers for financial gain. They state that it is not sustainable to keep converting family homes to HMOs. They seek clarity on how an application at 37 Cardiff Rd (24/00929/FUL) has been counted [in the City's housing supply], as it artificially inflates the number of residences.

Strategic Policy PLP16: Housing Target - Council response

How the representations have been taken into account:

- Policy PLP16: Housing Target from the Portsmouth Pre-Submission Local Plan 2024 has now entirely been replaced with a new policy PLP16: Housing Target in the Portsmouth Pre-Submission Local Plan Addendum 2025. Issues raised on this policy have largely been covered by the new policy.
- Some of the comments relate to the Government's approach to housing targets which do not necessitate a response from the Council.
- The Council has signed statements of common ground with neighbouring authorities to address issues regarding housing need and also dealt with this matter via the Duty to Cooperate which is documented in the Interim Duty to Cooperate Statement.
- In response to Southern Water's representation, the Council does not consider it necessary to add an additional criterion to Policy PLP16 as such matters are sufficiently addressed in city-wide Policies PLP32: Sustainable Drainage Systems and PLP50: Infrastructure Delivery. A statement of common ground has been prepared with Southern Water (dated September 2024) to address the issues they have raised.
- The Housing Background Paper provides evidence explaining the approach to policy PLP16 in the Addendum, including the justification for the 15% non-implementation rate for example.
- The comment from Premier Marinas regarding Port Solent is dealt with against the site-specific policy for that site.
- The new Addendum policy now includes explicit reference to the unmet need figure as requested by the comments from the HBF. A detailed housing trajectory is also now included in the Addendum, in Appendix 3.
- A definition of a 'dwelling' is proposed to be added to the glossary in the Schedule of Changes to the Pre-Submission Local Plan 2024.

- A statement of common ground has been prepared with East Hampshire District Council (dated July 2024) which includes matters of agreement regarding housing numbers. They did not make any representations against this policy via the consultation on the Portsmouth Pre-Submission Local Plan 2024.
- A statement of common ground has been prepared with Isle of Wight Council (dated July 2024) which includes matters of agreement regarding housing numbers. They did not make any representations against this policy via the consultation on the Portsmouth Pre-Submission Local Plan 2024.

Strategic Policy PLP17: Affordable Homes

	Number of respondents
Total number of respondents	5
Respondents who raised soundness	3
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	1

A3.100 Three respondents would like there to be a higher proportion of rental properties within the affordable housing allocations, and for those to contain enough properties at a social rent. Two respondents emphasise the importance of needing to have enough suitable affordable housing for key workers (e.g. NHS) close to the sites where they are employed. One respondent would like the affordable housing policy strengthened, and the language tightened to make it harder for developers to avoid providing 30% affordable housing within new developments.

A3.101 The following main issues were raised by specific consultation bodies on Policy PLP17: Affordable Homes:

- **NHS Property Services** support the principle of affordable housing, but flag that there is a need for affordable housing for NHS staff and other healthcare professionals, who are anchored to specific workplaces. In order to ensure the future sustainability of the NHS, and its role in providing the high quality healthcare services (involving a growing NHS workforce) needed to meet the needs of a growing population, due to housing development, NHS staff need access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve. The needs of NHS staff should be factored into future housing needs assessments that inform the local plan. To do this the NHS encourages the Council to engage with local NHS partners such as the local Integrated Care Board, NHS Trusts and relevant Integrated Care System partners. Site selection and allocation policies should be considered in light of any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers.

A3.102 The following main issues were raised by general and other consultation bodies on Policy PLP17: Affordable Homes:

- **Amanda Martin MP** would like the policy strengthened to remove the flexibility provided so that developers cannot avoid their responsibilities on affordable housing provision. She would like to see a stronger line around viability clauses, and a minimum provision included. She is glad to see rental products promoted over home ownership products as

the affordable housing delivered in new developments, but would prefer the split to be changed to 75%/25% to be greater in favour of rental products, with quotas in place to ensure sufficient delivery of social rent as a proportion of this. This relates to criterion 1b) of the policy.

- **Amanda Martin MP** states that for Build to Rent Homes, the proportion of homes for affordable rent should be 30% rather than 20%
- **Amanda Martin MP** indicates that there should be provision in the Plan to ensure local keyworkers are able to access new affordable housing.
- Two representors (**HBF** and **Abri Group**), state that the policy in unsound, due to 30% affordable housing target not being justified by the Viability Study Update (2024). National policy guidance on viability is referred to, where (at para 58 of the NPPF) decision makers should be able to assume development that complies with Plan policies is viable. Plans should not lead to viability testing on a case by case basis.
- **HBF** recommend a lower rate of affordable housing is set across the City, on a differential rate based on value areas so that fewer applications would need viability assessments. If the Council move forward on the current basis of site by site negotiation, part 1.a) of the policy should be re-written to set 30% as a starting point for negotiation, rather than a minimum of 30%, with suggested wording 'Seeks to deliver 30% of the units on site as affordable homes where viable'. This would ensure consistency with the evidence and with section 3 of the policy, which establishes the basis for negotiating a lower affordable housing requirement.
- **HBF** raise concerns about the Council's evidence base on viability (Development Viability Assessment) as they suggest that costs faced by developers in relation to policies such as BNG and Future Homes Standards may be higher than those considered in the Development Viability Assessment. For example, HBF suggests that it is wrong to assume that brownfield sites will have a relatively low level of biodiversity. The Development Viability Assessment also under-estimates the costs of purchasing off-site credits at £11,000 per credit, when the HBF suggests that the costs are in fact £30,000-£50,000 per credit. The HBF suggests that the Council looks at the baseline level of biodiversity on their allocated sites so that an assessment of affordable housing and other requirements can be made to ensure development can be viably delivered.
- **Abri Group** outline detail from the Viability Study Update that suggests a 20% Affordable Housing target would be viable, and would ensure delivery of new housing. They suggest that the target set is unrealistic and will require frequent use of site-specific viability appraisals, with associated costs and delays. The 30% target is unjustified and will render the policy ineffective and unrealistic. They request that the Council reconsider the target that is more realistic, to encourage development to come forward at pace, to meet local housing needs.
- **Abri Group** understands why early, late and mid-term reviews may be useful mechanisms where viability has been contested, but request that these are not used as standard as these are time-consuming and costly and distract from the delivery of new housing. They suggest that setting a more realistic target for affordable housing would be a better approach.
- **Churchill Living and McCarthy Stone (represented by the Planning Bureau)** raise an issue with the review mechanism. They indicate that there must be a clear and specific policy basis for a review mechanism (referencing PPG para 009). They also suggest that review mechanisms are not appropriate for small, single-phase developments such as older persons housing, and so they recommend adding an exemption for single-phase developments, suggesting the following wording: 'Single-phased development schemes will not be subject to a review mechanism. Where sites

have a construction programme which is proposed to extend beyond 2 years, the planning obligation will provide for the affordable housing component of later phases to be reviewed based on updated viability evidence which may result in an increase on the affordable housing requirement.'

- **Churchill Living and McCarthy Stone (represented by the Planning Bureau)** note the Council's Development Viability Assessment coverage and testing of older persons housing typologies (sheltered and extra-care) which indicates viability concerns. They also refer to an element of assessment in the Viability Assessment that they consider should be amended, and direct the Council to the Retirement Housing Consortium paper 'A briefing note on viability, by Three Dragons May 2013 (updated Feb 2016, RHG briefing note). They outline that the outcome of a robust assessment accounting for all policies and CIL should be incorporated into the Local Plan. The Council's viability evidence shows that 30% affordable housing is largely unviable for older persons housing, so it is contrary to the PPG (para 2) with regard to realism of the requirement set, and impacts on deliverability of development. They refer to policies at Swale and Fareham, which exempt older persons housing from affordable housing requirements, with Fareham also exempting these from CIL. They also reference Maidstone's recently-adopted Local Plan which has a lower affordable housing requirement for C3 retirement housing, and exempts C2 housing from delivering affordable housing. They also provide some more detailed feedback on the Development Viability Assessment and what costs should be used in relation to older persons housing developments.

Strategic Policy PLP17: Affordable Homes - Council response

How the representations have been taken into account:

- An explanation of the approach taken to PLP17: Affordable Homes can be found in the Affordable Housing Topic Paper, together with justification and reference to evidence supporting the policy. This includes the topic of viability.
- The Council does not consider it necessary to exclude retirement housing from the policy as requested by Churchill Living and McCarthy Stone. There is no requirement to do so in national policy and the Local Plan evidence base does not suggest this is needed; viability is challenging in Portsmouth across all types of development and not just retirement housing.

Development Management Policy PLP18: Housing Mix

	Number of respondents
Total number of respondents	2
Respondents who raised soundness	1
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.103 One comment made would like the Plan to include reference to the problems of the existing housing stock not being suitable for the ageing population e.g. more likely to have a fall if living in a 2-storey dwelling rather than single storey accommodation.

A3.104 No main issues were raised by specific consultation bodies on policy PLP18: Housing Mix.

A3.105 The following main issues were raised by general and other consultation bodies on Policy PLP18: Housing Mix:

- **Abri** consider the policy is sound. They support the inclusion of all new homes to be built to M4(2) standards, and also the proposed split of market and affordable homes to be built to both 'wheelchair adaptable' or 'wheelchair accessible' standards. They are interested in delivering more bungalows to contribute towards a mix of housing stock for the City.
- **Portsmouth & District Private Landlords Association (PDPLA)** consider the quality of, and potential issues associated with, the existing housing stock in the City, particularly for the ageing population, should be considered in the Plan.
- **PDPLA** The quality of existing housing stock may increase the demand for types of accommodation that are already in short supply, such as residential care or single storey accommodation.

Development Management Policy PLP18: Housing Mix - Council response

How the representations have been taken into account:

- An amendment is proposed to be made to the supporting text of this policy in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to the comment from PDPLA to clarify that co-living accommodation can include permanent accommodation. This was in response to a comment made by PLPLA regarding policy PLP19, but is also relevant to policy PLP18.
- No change is considered necessary to address the quality of existing housing stock as the Local Plan includes several proposals for regeneration which will help to address this.

Development Management Policy PLP19: Housing for Specific Groups

	Number of respondents
Total number of respondents	6
Respondents who raised soundness	3
Respondents who raised legal compliance	3
Respondents who raised Duty to Cooperate	3

A3.106 The Portsmouth District Private Landlords Association (PDPLA) question the suitability of the proposed co-living accommodation to be affordable for most current HMO residents and would like the Council to be more realistic about the number of poor and vulnerable in the City who will not be able to afford the new co-living accommodation. They also question the need for medium-term rental properties e.g. for contract workers and believe that the majority of homes needed are for permanent residency. One respondent queried whether void or unavailable properties within the housing stock have been assessed for use by service personnel. The University of Portsmouth would like all privately developed student

accommodation to be approved by them at planning stage to ensure it is: in walking distance from campus, has affordable rents, and fits with the needs of students.

A3.107 The following main issues were raised by specific consultation bodies on Policy PLP19: Housing for Specific Groups:

- The **NHS Hampshire and Isle of Wight ICB** make reference to specialist accommodation to meet the needs of older people, including extra-care which can support people to manage health conditions and minimise reliance on primary care needs. They also point to the reliance on doctors and/or nursing staff in nursing and residential homes, meaning developments of this nature can create additional pressures, due to complex needs of residents, on GP practice staff.

A3.108 The following main issues were raised by general and other consultation bodies on Policy PLP19: Housing for Specific Groups:

- **PDPLA** believe that the logic behind the co-living homes aspect of the policy is flawed. They suggest that co-living homes are a 'better' solution to HMOs and yet, they are not necessarily an affordable option, particularly for the poor and vulnerable population. They indicate that co-living homes work for student halls and retired communities, but not for other forms of housing.
- **PDPLA** flag that Paragraph 6.85 in the Local Plan notes that co-living is not for permanent occupation. PDLPA believe that there is a demand for co-living accommodation as a permanent home, and not just for a certain period of time.
- **UoP** welcome the acknowledgement of the growth of purpose built student accommodation (PBSA) in the City delivered by the private sector, and also the inclusion of PBSA within a policy. They believed the policy is legally compliant and complies with duty to cooperate but is not sound. They stated that PBSA that is appropriately located and well-managed plays an important role in the health and wellbeing of students, and the overall attraction of the University for prospective students. There can be negative side-effects on the students and University overall if such accommodation is either in a wrong location, unaffordable, an inappropriate design or quality and/or poorly managed. In order to protect against such potential implications and manage future PBSA development, the UoP recommends that Policy PLP19 be amended to acknowledge the following:

  '1) Location. PBSA development should be in locations that are within easy walking distance of the University.

  2) Affordability. UoP welcomes the prioritisation of cluster flats, but the policy should set out more principles to further secure affordable accommodation.

  3) Role of the University. A requirement to consult UoP to demonstrate how the University's requirements are to be fulfilled.'
- **Churchill Living and McCarthy Stone (represented by the Planning Bureau)** support PLP29, in relation to its support for specialist housing, including older persons housing; deeming it sound, legally compliant and compliant with the Duty to Cooperate.
- One representor indicates that the threshold needs to be changed from 10% to 5%. It is believed that this comment relates to Policy PLP20: Houses in Multiple Occupation rather than Policy PLP19.
- **Amanda Martin MP** notes that PCC is committed to supporting the armed forces community in order to ensure navy personnel and families have access to appropriate housing. She would like to know if there has been collaborative working between PCC and the Defence Infrastructure Organisation (DIO) to assess void and unavailable

properties for service personnel, and how this would potentially impact/contribute towards housing availability and stock within the City.

Development Management Policy PLP19: Housing for Specific Groups - Council response

How the representations have been taken into account:

- Wording referring to co-living accommodation not being permanent accommodation is proposed to be removed in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to comments from PDPLA.
- No change is proposed in response to the University of Portsmouth's representation as the Council considers the issues to be too detailed for inclusion in the policy.
- The Council continues to collaborate with the DIO (for MoD) to discuss housing for service personnel, and has a signed statement of common ground with them (dated December 2024), though they did not submit representations on this policy themselves, this was, however, raised by Amanda Martin MP.

Strategic Policy PLP20: Houses in Multiple Occupation

	Number of respondents
Total number of respondents	82
Respondents who raised soundness	80
Respondents who raised legal compliance	79
Respondents who raised Duty to Cooperate	79

A3.109 The Portsmouth District Private Landlords Association (PDPLA) feels that the complaints about Houses in Multiple Occupation (HMOs) are statistically misleading and over-emphasised in the documentation. They state that there are fewer HMOs than documented in the 2019 SPD as evidenced by more recent data from the additional licensing scheme. They would like the role HMOs play in the City and the continued need to be given more recognition.

A3.110 Two councillors would like the growth of new HMOs to be more restricted. One suggests a moratorium on applications, the other reducing the threshold for the percentage of existing HMOs surrounding any new application property to be used as an HMO.

A3.111 The following main issues were raised by specific consultation bodies on Policy PLP20: Houses in Multiple Occupation:

- **Historic England** request amended wording to reference heritage environment and significance, and suggest that reference or a link is provided to the relevant heritage policies within the plan. The approach is deemed unsound as it fails to align with national policy on historic environment. They also state that cross-reference to chapter 11 is merited.

A3.112 The following main issues were raised by general and other consultation bodies on Policy PLP20: Houses in Multiple Occupation:

- **PDPLA** flag that the Local Plan refers to the 2019 SPD on HMOs and raises concern about the content of this being misleading and inaccurate/out-of-date. They reference the University reporting a falling supply of HMO rooms and increasing affordability issues for students. They criticise the weight given to complaints re HMOs in the SPD. They assert that the Local Plan should give more recognition to the role played by HMOs and their continued need.

- A large number of individuals consider that the policy is not sound, not legally compliant and does not comply with Duty to Cooperate as it is not sustainable to keep converting homes into HMOs when there may be other alternatives. They assert that family housing stock has been targeted for HMO conversions by developers for years and may create unbalanced communities within the City. They note paragraphs 6.104-6.109 in particular, and propose the following modifications to section 1a) of Policy PLP20, which changes the threshold where HMOs will be permitted from 10% to 5%:

  '1a) Less than 5% of residential properties within a 50 metre radius of the area surrounding the application property are in existing use as an HMO. If the 5% is refused, the 10% should remain as a fallback option.'

  They suggest that if the proposed reduction to a 5% Policy fails, the Council should ensure that the inspector keeps the 10% rule.

- One individual commented that the 10% rule is inappropriate due to the high concentration of houses in Portsmouth, as there are often over 60 properties within the given distance. Many of the properties caught by the radius search are caught by parts of their back gardens. This can lead to multiple HMOs being located next door to each other with none on the adjacent roads. Therefore, the maximum percentage should be changed from 10% to 5%

- One individual commented that whilst most Councils have a 10% rule, Portsmouth is unique due to its island geography and should have a lower maximum percentage.

- One individual suggests that the percentage of HMOs allowed within a 50 metre radius should be reduced to between 4% and 7%.

- One individual asserts that the 10% policy formed part of the previous Local Plan (2012) and is outdated. The current issues around house prices were not as prevalent when the previous plan was published.

- One individual commented that the policy proposes the introduction of a percentage of HMOs to 10%.

- One individual commented in detail on paragraph 1 section a, like others, suggesting that a minor change should be made from allowing HMOs where less than 10% of residential properties within a 50m radius of the area are existing HMOs to 5%. He reasons that Portsmouth is a unique city, until recently it was the most densely populated city in the UK (outside London). Services in Portsmouth are stretched, parking is a major concern, roads are at breaking point and the old Victorian sewer system is failing under the current strain with multiple cases of major road closures to remedy the issues. He flags that it is important to note that Portsmouth is the only Island City in the UK and has a mere 3 roads on and off the Island. The major towns such as Gosport, Fareham, Havant are not connected via the southern parts of the city and all inbound traffic must come in

via the north of the city. This means daily there are large numbers of congested zones which show CO2 emissions are sky rocketing and the environment is being negatively impacted. He states that the Council has one of the worst recycling rates in the country and worst primary education results. He asserts that this is all directly linked to overdevelopment. Although he suggests this is not a planning consideration, it is factual he states, that HMOs do bring a larger number of cars into the area. They increase crime, fly-tipping and anti-social behaviour. He suggests that independent reports and audits back up these statements and can be fact checked. He notes that there is an overwhelming desire from residents in Portsmouth not to allow HMOs to go ahead as there are already thousands. He states that 10% is too high and not sustainable, and instead the Council should be focussing on better, high quality, affordable housing in locations that can handle such development. He asserts that Portsmouth is in a unique position to request a lower HMO target rate than 10% on the reasoning that it is not comparable to other city councils in the UK. Portsmouth is unique, and so needs an HMO policy that works for the City and its residents. 5% would mean that some areas are already at capacity meanwhile would allow the areas currently unaffected to have a better, fairer and more even spread of HMOs across the city. This representation had a note saying 'The reason we didn't submit, as a political party, this amendment into the draft local plan is we feel, as a group of councillors, we were misled and we are currently exploring a corporate complaint procedure. This is why my comments have come via residential consultation. We define this change as "minor" and should be submitted to Secretary of State/Inspector for consideration as we are looking at changing one minor policy paragraph in a 300 page local plan document. This would define, in our opinion, the change as a minor change and should be considered.'

- A large number of individuals also suggest changes to section 1b) of the policy, suggesting the following change, allowing only two HMOs in a row rather than three:

  '1b) Development does not result in a non-HMO property being 'sandwiched' between HMO properties and does not result in two or more HMO properties in a row. More than two houses between HMOs would be acceptable.'
- Other individuals suggest that the sandwiching policy should be increased to ensure *more* than 2 no. C3 dwellings are between 2no. HMO properties, rather than the 2 no. currently required by policy.
- One individual commented that the document does not yet exist, so cannot be legally compliant, adding that the objectives of the Council and the new Labour Government should be put above the needs of HMO investors. They also commented that HMO guidance is scattered over a number of documents and policies from different Council departments, which results in a failure of the Planning Department to consider aspects such as utilities, infrastructure, carbon release from building works, the loss of historic properties, communities and the fabric of conservation.
- One individual commented that HMOs are not homes and should not contribute to housing provision.
- One individual commented that HMOs do not contribute to s106 or Community Infrastructure Levy.
- A number of individuals indicate that the number of HMOs is continuing to increase without any cap or regulations.
- One individual flags that there is no monitoring during the build phase to ensure that the standards are met, the current process of self-certification and self-regulation are flawed.

- One individual highlights that the proposed policy does not comply with the Council and Central Government objectives, especially with regards to ULEZ Zones due to increased pollution.
- A number of individuals raise the concern that the proposed policy favours HMO developers and does not protect residents, rather the material gain of housing.
- A number of individuals commented that the policy does not support families attempting to get onto the property ladder. They state that affordable family housing should be given priority.
- One individual questions whether there are enough single people to occupy the number of HMOs that are being developed.
- A number of individuals state that HMOs offer poor quality shared housing.
- One individual suggests that the policy should be changed to only allow properties to be converted into two flats (one on each floor) to allow for self-contained dwellings that are not shared with other tenants.
- A number of individuals state that the policy should provide more new housing rather than conversion of existing housing stock.
- One individual commented that HMO conversions are draining the very limited housing stock. They stated that developers have targeted Portsmouth's housing stock for the past four years.
- One individual flags that a number of non-core supporting documents were not available for viewing and as such proper publicity was not carried out and residents that commented were not able to fully consider matters. These documents are stated as being: the Legal Compliance Toolkit, Soundness Self-Assessment Toolkit, Houses in Multiple Occupancy (HMO) Topic Paper, Statements of Common Ground between PCC and the following: Environmental Agency, Natural England, Southern Water, Coastal Partners and National Highways.
- One individual suggests that there should be a maximum number of HMOs within a 50 metre radius (i.e. X amount within 50 metre radius).
- One individual states that landlords should be made to take full responsibility, should be able to be contacted at all times by neighbours, and fines should be issued for failing to deal with anti-social behaviour and waste.
- One individual flags that the proposed policy does not ensure that the City's communities do not become imbalanced by single adults.
- One individual points out that the people that own HMOs do not live in the area and therefore, are not held accountable.
- One individual suggests that HMOs should be removed from residential areas and moved to disused buildings such as Furze Lane, which have open space for parking.
- One individual suggests that the Planning Department should be externally audited, as they are using incorrect data to decide applications for HMO conversions.
- An individual suggests that the policy goes against the 2019 HMO SPD in that it states that it does not take account of statements within the SPD regarding the lower availability of much needed family housing, the negative impacts of high concentrations of HMOs on

communities, a need for family housing, a prediction of an increase in the demand for larger family housing and that the supply of family housing is not jeopardised by unchecked HMO development.

- One individual states that the policy should be amended to outright refuse any application for the conversion of C3 properties to HMOs, and allow a maximum of 5% of HMO conversions of existing large commercial properties and offices within a 50m radius of that site.
- A number of individuals suggest that the HMO Licensing regime should be reformed to ensure maximum occupancy levels limits the scale of developments. Licensing should be made more public and transparent.
- An individual suggest that specific policies should be adopted for Victorian and Edwardian terraced properties as they are not structurally suitable for conversion, and permitted development rights allow for the entire back garden to be lost.
- One individual suggests that restrictions on permitted development rights should be introduced in Portsmouth. The Council should suggest that experimental rules are allowed by the Government and monitored by the Inspector.
- One individual indicates that flat conversions should be counted as 1 no. subdivided property for the purposes of the 50-metre radius count.
- One individual commented that there should be a minimum space requirement for HMO conversions, similar to the restriction on flat conversions in the current local plan.
- One individual suggests that there should be higher environmental requirements in place for HMO conversions.
- An individual suggests that the Council form a support team that takes action against developers on behalf of neighbours affected by HMO conversions, and should not refuse to get involved in civil matters.
- One individual commented that Portsmouth does not have an M&S or department store, yet Havant does.
- An individual observes that Portsmouth is becoming a housing estate.
- A number of individuals commented that the number of HMOs in the City should be reduced as there are too many already.
- A number of people commented that HMOs cause anti-social behaviour, and increase crime rates. They assert that there are too many people in Portsmouth already, the Police service is already too stretched and cannot cope with an increased population as a result of HMO developments.
- An individual states that you cannot move in the City as it is too crowded.
- An individual highlights that you cannot park a car in the City, residents cannot park in their own streets, and HMOs cause a further reduction in the availability of on-street car parking spaces.
- One individual flags that elderly residents are too scared to leave their homes due to HMOs being mostly filled with younger men, which is affecting their mental health.
- One individual points out there are only three ways in and out of the City.

- One individual suggests that the redevelopment of the City Centre should be reconsidered to provide single occupancy rooms rather than 1,600 units, which would be better for transport issues caused by HMOs.
- One individual comments that there was no consultation, they were not notified about the policy or they were notified too late about the policy to make an informed comment.
- One individual suggests that the maximum limit should be changed to 'within any 50m radius and not just a 50m radius of the property applying for HMO status.' It is considered that this would spread HMOs more evenly and prevent high concentrations within an area.
- An individual questions whether the City's sewerage system can cope with increased numbers of HMOs.
- A number of individuals commented that there will be more household waste as a result of HMOs.
- An individual asserts that there is more noise/noise disturbance as a result of HMOs.
- An individual suggests there is more water usage as a result of HMOs.
- One individual states that HMOs are disgusting.
- One individual suggests that HMOs lower house prices of residents and make it difficult to sell neighbouring properties.
- One individual observes that if people want to come into Portsmouth, they should use trains.
- One individual flags that Fratton (specifically) is already overcrowded, has high levels of anti-social behaviour and excess rubbish caused by HMOs.
- One individual highlights that recent developments granted permission such as at Tipner are mostly made up of one and two bedroom properties, so there will be a higher demand for larger houses for families, which should be protected more stringently.
- One individual commented that Portsmouth has too many students, which affects the lives of residents.
- A number of individuals commented that there are many existing HMOs which are unregistered and do not meet the required standards.
- One individual commented that children are not safe if they live next to HMOs, and it is not right for children to have to live next to 8-12 persons.
- One individual states that family housing within catchment areas of schools are being converted to HMOs, which makes it difficult for children to get places in those schools, and there are not enough school places within Portsmouth.
- One individual observes that when houses come up for sale, residents are scared that it could become an HMO which would make them have to move.
- One individual stresses that there is an increased pressure on doctors, hospitals, dentists, schools and carers as a result of HMO developments.
- One individual suggests that HMOs are a "sticking plaster" to a wider problem of a lack of affordable housing provision.

- One individual asserts that HMO developments affect the structural integrity of buildings within the City.
- One individual suggests that HMOs cause an increased risk of flooding due to the geographical location of Drayton and Farlington.
- One individual commented that the plan states that there are 37 houses converted to HMOs per year, when in fact, at the current rate, it is 150-200. These conversions represent a loss of family housing.
- One individual asserts that the opposition party were misled over the meaning of "draft" plan, and the committee meeting was not carried out properly due to a lack of community involvement and the misuse of Purdah to stifle debate.
- One individual felt that it was disingenuous to undertake the consultations in August, when many people spend time with their families.
- One individual suggests that HMOs should only be allowed where there is rear access to allow for cycle storage (without having to wheel a bicycle through the house).
- One individual asserts that the lack of public consultation and in-depth research into a 5% policy breaches the Localism Act 2011/2012.
- Several individuals suggest that there should be greater clarification on the definition of 'dwelling.'
- One individual suggests that the Council's HMO database should be updated, and that HMOs are not affordable housing.

Strategic Policy PLP20: Housing in Multiple Occupation - Council response

How the representations have been taken into account:

- No changes are proposed to the policy in response to comments raised. Some comments are in favour of HMOs and the proposed policy, others are against, and the Council considers its approach to be justified and appropriate.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- A definition of a 'dwelling' is proposed to be added to the Glossary in the Schedule of Changes to the Pre-Submission Local Plan 2024.

Development Management Policy PLP21: Residential Density

	Number of respondents
Total number of respondents	5
Respondents who raised soundness	4
Respondents who raised legal compliance	4
Respondents who raised Duty to Cooperate	4

A3.113 Network Rail supports the proposed high density residential developments around the main train stations. They would like developers to also fund station

improvements as part of their planning obligations to increase accessibility and uptake of rail usage.

A3.114 The following main issues were raised by specific consultation bodies on Policy PLP21: Residential Density:

- **Network Rail** support the proposed high density residential zones identified around Portsmouth Harbour and Portsmouth & Southsea train stations.

A3.115 The following main issues were raised by general and other consultation bodies on Policy PLP21: Residential Density:

- **Southampton City Council** deem the policy to be sound, legally compliant and comply with Duty to Cooperate. They are supportive of the minimum density requirements and the proposed residential density zones.
- A number of individuals assert that the policy is unsound, unsustainable and unjustified to target the most densely populated residential areas in the City for even higher density development. Other alternatives should be explored.
- They also note that the City's Public Transport Network should be improved so that it is more accessible to a larger area, not just high residential areas.
- A number of individuals commented that the proposed threshold for high density development (120dph) is too high and should be capped at 100dph instead. They suggest the following modification: 'Where a proposed development has a higher residential density level than 100dph, the proposal must be supported by robust evidence that justified the proposed density, proving that it is sustainable for the area.' One of these individuals asserts that the proposals propose to increase the density from current levels.
- One individual commented that the most densely populated residential areas in the City should note be targeted for even higher density development. Other alternatives should be explored.
- One individual suggests that increased densification would exacerbate existing issues such as sewage spillages, on-street residential parking, access to NHS services and availability of school spaces.
- One individual suggests that the Public Transport Network should be improved so that it is more accessible to a larger area, not just high density residential areas.
- One individual asserts that there should be greater clarification on the term 'Dwelling.'

Development Management Policy PLP21: Residential Density - Council response

How the representations have been taken into account:

- No changes are proposed to this policy in relation to comments raised. The background and justification to the policy is set out in the Housing Background Paper.
- A statement of common ground has been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- A definition of 'dwelling' is proposed to be added to the Glossary in the Schedule of Changes to the Pre-Submission Local Plan 2024.

Development Management Policy PLP22: Space Standards

	Number of respondents
Total number of respondents	2
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.116 Southern Water would like a criterion added to the policy to ensure sufficient distance between wastewater treatment works and new developments to disperse any odours. This should be done through consultation with Southern Water.

A3.117 The following main issues were raised by specific consultation bodies on Policy PLP22: Space Standards:

- **Southern Water** raised concerns about odours emitted from their sewage and sludge treatment works. They state that new development that is sensitive to odour must be adequately separated from such treatment works to safeguard the amenity of future occupiers, in line with paragraphs 180 and 182 of the NPPF (2018). They suggest that an assessment should be carried out to demonstrate that there is not detrimental impact, in terms of odour emission, on amenity. They recommend the below criterion is added to the policy:

  'Layout for new development must provide sufficient distance between any Wastewater Treatment Works and sensitive land uses, such as residential units, schools and recreational areas, to allow adequate odour dispersion, on the basis of an odour assessment to be undertaken in consultation with Southern Water.'

A3.118 The following main issues were raised by general and other consultation bodies on Policy PLP22: Space Standards:

- **HBF** consider the policy is not sound as there is insufficient evidence to support the adoption of space standards. They note that paragraph 6.123 states that analysis of past completions has been undertaken, but this could not be found in the evidence base. They questioned whether or not there is evidence of housing in Portsmouth being well below acceptable space standards and assert that the Council should consider if such space standards would impact the affordability of some homes. They state that homes which are built below space standards can still meet the needs of many households in terms of cost and the number of rooms required.

Development Management Policy PLP22: Space Standards - Council response

How the representations have been taken into account:

- There are no wastewater treatment works in Portsmouth, so the Council does not consider it necessary to add the additional criterion suggested by Southern Water. A statement of common ground has been prepared with Southern Water (dated September 2024) to address the issues they have raised.
- An amendment is proposed to paragraph 6.123 in the Schedule of Changes to the Pre-Submission Local Plan 2024 to clarify that dwellings with more bedrooms (rather than larger dwellings) are more likely to be compliant with nationally described space standards (NDSS), and a footnote is proposed to be added with a link to the Space Standards Background Paper.

Area Allocation Policy PLP23: Estate Renewal

	Number of respondents
Total number of respondents	3
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.119 Network Rail would like a Travel Plan and Transport Assessment to assess the potential transport impacts of all new developments to encourage sustainable travel and mitigation. Portsmouth City Council suggest the estate renewal design code approach for all developments, not just Council-owned estates.

A3.120 The following main issues were raised by specific consultation bodies on Policy PLP23: Estate Renewal:

- **Historic England** deem the policy is unsound as there is no reference to the historic environment or heritage assets; a number of conservation areas fall within the proposed estate renewal areas. They suggest that criterion 2 g) of the policy be amended as follows:

  'Deliver high quality design and sustainability, taking into account any relevant design guidance or codes and the significance and character of any affected heritage assets.'

  They also believe that there would be merit in referencing Chapter 11: Heritage in the supporting text.
- **Network Rail** observe that a number of estate renewals identified are in close proximity to train stations. They suggest that the following wording be included so that the plan is consistent throughout in promoting a sustainable transport strategy, and to encourage sustainable travel:

  'Submission of a Travel Plan and Transport Assessment to assess the potential transport impacts of the development, acts and implications, propose mitigation measures and identify opportunities to implement effective sustainable transport initiatives.'

A3.121 The following main issues were raised by general and other consultation bodies on Policy Area Allocation Policy PLP23: Estate Renewal:

- **PCC Public Health** welcome the future development of an Estate Renewal Design Code referencing paragraph 6.141, page.164 of the Local Plan. They also suggest that a design code approach for development in general should be rolled out more widely.

Area Allocation Policy PLP23: Estate Renewal - Council response

How the representations have been taken into account:

- A change is proposed to paragraph 6.138 in the Schedule of Changes to the Pre-Submission Local Plan 2024 to add reference to heritage assets in response to the representation from Historic England. A statement of common ground has also been signed with Historic England (dated 2025) to address the issues they have raised.
- A statement of common ground has been signed with Network Rail (dated November 2024) to address the issues they have raised.
- PCC Public Health's comments on Design Codes are addressed through Policy PLP1: Design.

Development Management Policy PLP24: Gypsies, Travellers & Travelling Showpeople

	Number of respondents
Total number of respondents	1
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.122 The following main issues were raised by specific consultation bodies on Policy PLP24: Gypsies, Travellers & Travelling Showpeople:

- **Winchester City Council** (WCC) consider the Policy to be sound and support it. They state that despite a shortfall of capacity to meet need for Gypsy and Traveller Accommodation within the WCC area, they acknowledge PCC's extremely constrained land supply and accept that PCC is not able to meet any of WCC's unmet need.
- **WCC** consider that Policy PLP24 allows suitable sites to come forward, if they become available, and the policy is consistent with the Winchester Local Plan.

Development Management Policy PLP24: Gypsies, Travellers & Travelling Showpeople - Council response
How the representations have been taken into account: • No changes to this policy are required as there has only been one comment on this, which is in support. • Statements of common ground have been prepared with Winchester City Council (dated August 2024 and October 2024) to address the issues they have raised.

Chapter 7: Thriving Economy

	Number of respondents
Total number of respondents	2
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.123 The NHS Hampshire and Isle of Wight Integrated Care Board would like the shortfall in primary care to be mitigated directly by new developments and points out that increased healthcare infrastructure boosts jobs, often well-paid ones.

A3.124 The following main issues were raised by specific consultation bodies on Chapter 7: Thriving Economy:

- **NHS Hampshire and Isle of Wight ICB** state that creating a thriving economy and generating employment opportunities is a key driver for the Local Plan and for it to meet its strategic objective Healthy and Happy. They mention that there is already a shortfall of primary care infrastructure capacity and without any form of direct mitigation from new developments then this position will worsen and will be a barrier to the authority to achieve this objective. They observe that an increase in healthcare infrastructure would provide additional jobs.

A3.125 The following main issues were raised by general and other consultation bodies on Chapter 7: Thriving Economy:

- **Portsmouth International Port** thank the Council for referencing the importance of the port to the economy and linking to the masterplan.

Chapter 7: Thriving Economy - Council response

How the representations have been taken into account:

- No changes are proposed to the introduction of Chapter 7: Thriving Economy as none of the responses suggest specific changes.

Strategic Policy PLP25: Employment Target

	Number of respondents
Total number of respondents	3
Respondents who raised soundness	2
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	2

A3.126 First Hampshire & Dorset Ltd state that there is a lack of provision for industrial floor space with too much focus on large sites. They would like to see additional smaller sites added to the plan for this land use and reference the Hilsea Bus Depot as one such potential site.

A3.127 No specific consultation bodies made any representations on Policy PLP25: Employment Target.

A3.128 The following main issues were raised by general and other consultation bodies on Policy PLP25: Employment Target:

- **First Hampshire & Dorset Ltd (represented by Vail Williams)** raise concerns over an under supply of industrial floorspace, and an over reliance on a few large sites to meet industrial need. They state that there is no evidence of the Council having sought alternative/additional sites to make up the shortfall. They suggest that the Hilsea Bus Depot site provides an opportunity for providing smaller units, particularly given the existing employment nature of the site.
- **Premier Marinas** express support for the employment target.
- **Southampton City Council** suggested amendment to the Plan in regard to offices that any applications that would exceed the target for offices set in Policy PLP25 should be subjected to a sub-regional sequential assessment. The purpose of this would be to establish whether any alternative sites are available in neighbouring local authorities, including Southampton City Centre.

Strategic Policy PLP25: Employment Target - Council response

How the representations have been taken into account:

- Policy PLP25: Employment Target from the Portsmouth Pre-Submission Local Plan 2024 has now entirely been replaced with a new policy PLP25: Employment Target in the Portsmouth Pre-Submission Local Plan Addendum 2025. Issues raised on this policy have largely been covered by the new policy.
- No change has been made in regard to the representation from First Hampshire & Dorset Ltd; the supply of employment sites was assessed in the 2025 HELAA. Hilsea Bus Depot is in active current use as a bus depot and is not currently available as an employment site. If and when it comes forward for development for new industrial floorspace it will be duly considered under emerging Policy PLP25: Employment Target and PLP26: Safeguarding Employment Land which encourages the redevelopment of existing employment premises that provide improved employment accommodation. Its development for employment could come forward as windfall and does not require allocation.
- A statement of common ground has been prepared with East Hampshire District Council (dated July 2024) which includes matters of agreement regarding employment. They did not make any representations against this policy via the consultation on the Portsmouth Pre-Submission Local Plan 2024.

Development Management Policy PLP26: Safeguarding Employment Land

	Number of respondents
Total number of respondents	1
Respondents who raised soundness	1
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.129 Southampton City Council support the policy approach of refusing development proposals that would result in the loss of marine business premises on waterfront sites.

A3.130 None of the specific consultation bodies made any representations on PLP26: Safeguarding Employment Land.

A3.131 The following main issues were raised by general and other consultation bodies on Policy PLP26: Safeguarding Employment Land:

- **Southampton City Council** supports the policy approach of refusing development proposals resulting in the loss of marine business premises on waterfront sites. They note this is justified by the Government's Maritime 2050 strategy and that the policy approach mirrors the approach being taken by SCC in its new Plan.

Development Management Policy PLP26: Safeguarding Employment Land - Council response
How the representations have been taken into account: • No changes are considered necessary to this policy as the only representation is in support of the policy.

Development Management Policy PLP27: Employability & Skills

	Number of respondents
Total number of respondents	1
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.132 The following main issues were raised by specific consultation bodies on Policy PLP27: Employability & Skills:

- **Historic England** note the supporting text provides an opportunity to promote the heritage skills sector and potential to link to the Council's Heritage Strategy and City's maritime heritage.
- **Historic England** suggest that the entry on Commercial Road (regarding table 7.2) needs to connect with the area's character and heritage, informed by the heritage impact assessment.

A3.133 The following main issues were raised by general and other consultation bodies on Policy PLP27: Employability & Skills:

- **PCC Public Health** point to a desire to see climate resilience come through this policy and consider that there is real opportunity for green infrastructure.

Development Management Policy PLP27: Employability & Skills - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with Historic England (dated 2025) which addresses the issues they have raised.
- No change is proposed in response to comments from PCC Public Health as climate resilience and green infrastructure are addressed elsewhere in other relevant policies of the Local Plan. A statement of common ground has been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.

Development Management Policy PLP28: Town Centres

	Number of respondents
Total number of respondents	2
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.134 Two responses have been received from departments at Portsmouth City Council. The Local Highway Authority would like Policy PLP28 updated to reference Policy I of the Portsmouth Transport Strategy, and the Public Health Department would like greater inclusion of policy to control proliferation of licensed premises and hot food takeaways, to help tackle local health issues.

A3.135 The following main issues were raised by specific consultation bodies on Policy PLP28: Town Centres:

- **PCC LHA** point to Policy I of the Portsmouth Transport Strategy, which states 'that if city centre, local and district centres are to be successful, they must be attractive places to visit and that there is a large body of evidence that investing in better public realm and managing traffic so that more people walk, cycle and use public transport results in higher levels of footfall, reduced vacancy rates and improved road safety.' The policy therefore, seeks to give priority and more space to walking, cycling, micromobility and public transport modes, and seeks to provide more social spaces by changing some parking spaces into community spaces (parklets). They request the policy is updated to reference and reflect Policy I of the Portsmouth Transport Strategy.

A3.136 The following main issues were raised by general and other consultation bodies on Policy PLP28: Town Centres:

- **PPC Public Health** highlight the loss of extant detailed policy on licensed premises/ drinking establishments and hot food takeaways due to the Southsea Area Action Plan (policy STC5) being superseded by PLP28 and PLP30. They argue that policy should be included in the Plan to: limit proliferation of these uses, to tackle concerns around their concentration and clustering in local centres, their siting with regard to proximity to schools, and to ensure that health is considered in planning decisions for alcohol licensing and hot food assessments. The representation provides links to local health

data (including on high rates of liver disease, obesity and poor diets) and guidance from Public Health England and London Healthy Development Unit.

- **PCC Public Health** point to a desire to see climate resilience come through this policy and considers that there is real opportunity for green infrastructure.

Development Management Policy PLP28: Town Centres - Council response

How the representations have been taken into account:

- No change is proposed in response to the comments made by PCC LHA as the Council considers that the intention of Policy I of the Transport Strategy is sufficiently covered in policies PLP47: Movement and Transport and PLP49: Public Realm of the Local Plan and therefore does not require duplication in this policy. The attractiveness of the public realm in centres is addressed in policy criterion (3) of PLP28: Town Centres. A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- No changes are proposed in response to the comments made by PCC Public Health. The Council considers that this is a matter adequately covered by national planning policy. Any new local plan policy to specifically control the proliferation of licensed premises/drinking establishments and hot foot takeaways would require the consideration of the latest town centre evidence and could be the focus of future work if deemed necessary.
- No changes are proposed in response to the comments made by PCC Public Health in relation to climate resilience. The Council considers climate resilience and green infrastructure are sufficiently covered in the City-wide policies PLP2: Climate Emergency and PLP38: Green Infrastructure.
- A statement of common ground has been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.

Development Management Policy PLP29: Small Local Shops

	Number of respondents
Total number of respondents	0
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.137 No representations were received in response to this policy.

Development Management Policy PLP29: Small Local Shops - Council response

How the representations have been taken into account:

- No representations were made on this policy.

Strategic Policy PLP30: Cultural and Visitor Economy

	Number of respondents
Total number of respondents	6
Respondents who raised soundness	3
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	2

A3.138 Network Rail support the policy, stating that leisure travel is the fastest growing sector of the rail industry, and would like the following wording inserted: 'Access and connections to and between cultural facilities and visitor attractions and the City, town centres and public transport hubs especially rail stations should be improved to maximise usage and ensure engagement with as wide an audience as possible. This may be through enhancement to building design, public realm, signposting, wayfinding and active travel.'

A3.139 PCC Transport supports the policy, and wonders whether reference to the Local Cycling and Walking Infrastructure Plan 9 could be referenced, which if delivered, would alleviate many of the connectivity issues mentioned.

A3.140 The following main issues were raised by specific consultees on Policy PLP30: Cultural and Visitor Economy:

- **Network Rail** note and agree on the benefits of the visitor economy for Portsmouth. They suggest amendments to the wording of policy criterion 5 to include specific reference to improve access and connections to and between cultural facilities and visitor attractions and the City, town centres and public transport hubs, especially rail stations, and enhancement through active travel. The purpose of this is to promote an effective sustainable transport strategy across the Plan and to encourage sustainable travel.
- **Historic England** support the recognition of heritage in this section of the Plan.
- **PCC LHA** supported the wording of paragraphs 7.88 and 7.89, and suggested amending paragraph 7.89 to include mention of the Local Cycling and Walking Infrastructure Plan (LCWIP), as if the LCWIP is delivered it would help address many of the connectivity issues mentioned.

A3.141 The following main issues were raised by general and other bodies on Policy PLP30: Cultural and Visitor Economy:

- **PCC Public Health** point to a desire to see climate resilience come through this policy and consider that there is real opportunity for green infrastructure.
- **Premier Marinas** broadly support the policy, stating that sufficient flexibility is required in Policy PLP11 for a hotel to be delivered at Port Solent to help support the leisure/ tourism industry.
- One individual states that as Portsmouth earns much of its living from tourism, largely focused on its architectural and historic heritage also enjoyed by local people, the importance of care for, and creative reuse of this special legacy needs much greater emphasis and is currently missing from the Local Plan.

Strategic Policy PLP30: Cultural and Visitor Economy - Council response

How the representations have been taken into account:

- In response to issues raised by Network Rail and PCC LHA, the Council has proposed amendments to PLP30 criterion 5 and paragraph 7.89 respectively in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has also been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- No changes are proposed in response to the comments made by PCC Public Health in relation to climate resilience. The Council considers climate resilience and green infrastructure are sufficiently covered in the City-wide policies PLP2: Climate Emergency and PLP38: Green Infrastructure. A statement of common ground has been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.

Chapter 8: Climate Emergency

	Number of respondents
Total number of respondents	2
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.142 Langstone Harbour Board raises the possibility of exploring a Beneficial use of Dredged Sediment scheme along the Milton Lock frontage at the St James' and Langstone Campus, using dredged sediment from the approach channel to Southsea Marina and building up the height of the mudflat embankment along the site boundary. Raising the height of the embankment could lead to the colonisation of saltmarsh, helping to establish flood risk mitigation for the site.

A3.143 No main issues were raised by specific consultation bodies on Chapter 8: Climate Emergency.

A3.144 The following main issues were raised by general and other consultation bodies on Chapter 8: Climate Emergency:

- **Milton Neighbourhood Forum** state that PCC's Health & Well-Being Strategy recognises the impacts of poor air on life expectancy. They say that the Plan should provide further linkage between densification of development compounded by paucity of open space. They suggest the Plan ought to have more regard to the City's poorer than average health outcomes.
- **Langstone Harbour Board** note that Portsmouth is an island surrounded by water and is already facing pressure from the effects of climate change. They state that Portsmouth is bounded by over 10,000 acres of designated habitats precious natural assets that must be protected to help mitigate both the climate and nature emergencies. Both Portsmouth and Langstone Harbours are home to intertidal seagrass meadows and depleting saltmarshes, which both have large carbon sequestration capabilities, as well as providing a habitat for a range of species.
- **Langstone Harbour Board** commented that flood risk and coastal management should take note of the fact that Langstone and Portsmouth Harbours provide a significant buffer to the effects of coastal flooding. Coastal wetlands provide natural defences against coastal flooding through dissipation of wave energy. Of specific importance in Langstone Harbour is the presence of saltmarsh, which can reduce the height and energy of damaging waves by up to 20%. However, saltmarsh extent in Langstone Harbour has been rapidly declining over the past five decades as a result of coastal squeeze, pollution, and rises in sea level. Salt marshes also have the capability to sequester carbon at a large rate, storing the compounds in sediments and organic material. For coastal areas, like those surrounding Portsea Island, restoration of these salt marshes would have a cleaning effect of the nearby environment, reducing carbon quantities in the atmosphere, providing a refuge for a host of rare flora and fauna, and protecting water quality by filtering runoff and metabolising excess nutrients.
- An individual commented that St James' and Langstone Campus, an area allocated for the development of 417 dwellings, is identified as an area likely to be subject to coastal flooding within the next 100 years. It could be possible to explore a Beneficial use of Dredged Sediment scheme along the Milton Lock frontage at the Site, using dredged sediment from the approach channel to Southsea Marina and building up the height of the mudflat embankment along the Site boundary. Raising the height of the

embankment could lead to the colonisation of saltmarsh, helping to establish flood risk mitigation for the Site.

Chapter 8: Climate Emergency - Council response

How the representations have been taken into account:

- With regard to the Milton Neighbourhood Forum's comments on poor health outcomes, all of the plan's policies have been subject to Health Impact Assessment as part of the Integrated Impact Assessment. A significant number of changes to policy have been proposed that reflect this. A statement of common ground has been prepared with Milton Neighbourhood Forum (dated August 2024) to address the issues they have raised.
- The comments made by the Langstone Harbour Board in respect of climate change and flood risk have been noted, but no change is proposed. Habitat restoration in the harbour is beyond the direct scope of the Local Plan. The importance of the saltmarsh habitat is recognised through the Hampshire local Nature Recovery Strategy.
- The comments from individuals regarding flood risk are noted, proposals for the flood defence of the City are addressed by the Shoreline Management Plan and through Coastal Partners.
- A change is proposed to paragraph 8.7 in the Schedule of Changes to the Pre-Submission Local Plan 2024 to add reference to the North Portsea Island Scheme in response to a point raised by the Environment Agency against another part of the plan.
- A change is proposed to paragraph 8.8 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to a comment made by Coastal Partners in relation to PLP31.

Strategic Policy PLP31: Flooding

	Number of respondents
Total number of respondents	6
Respondents who raised soundness	2
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	2

A3.145 Respondents are generally supportive of the policy and request various policy wording tweaks: Coastal Partners want to add that funding is not guaranteed for the continued maintenance of sea defences, Southern Water would like rainfall-related flooding to be included and highlight the need to prevent any connection of developments' surface water drainage to the foul sewer network, and Historic England would like to add wording about flood risk to heritage assets and elevate the importance of retaining buildings given how much carbon is stored in them. Network Rail mention the area around Cosham Station as being susceptible to surface water flooding.

A3.146 The following main issues were raised by specific consultation bodies on Policy PLP31: Flooding:

- **Environment Agency** consider PLP31 to be legally compliant, sound and in compliance with duty to cooperate. They fully support the policy approach with only minor amendments proposed:
  '8.7 When the North Portsea Island scheme is complete it will reduce the risk of tidal flooding to the Eastern Road and A3, but only the sections of those highways that lie within the benefit area to the south of the upgraded flood defences.
  8.9 should read ‘tidal Flood Zone 3b’
  8.16 the word ‘assessment’ has been omitted.'
- **Environment Agency** provide comments on the sequential and exception test. They feel the approach would be more robust using hazard mapping as opposed to assessing the amount of each site located within flood zones 2 and 3 now and in the future. They agree this would not however alter the outcomes of the sites proposed.
- **Historic England** highlight the importance of flooding as an issue on the historic environment. As acknowledged by criterion 1.g), flood prevention measures need to be sensitive to their surroundings. From a heritage perspective, this means not causing unacceptable harm to heritage assets. Historic England recommend the addition of some wording regarding these concerns but do not suggest specific wording themselves.
- **Southern Water** support the overall intention of Policy PLP31, although would like to see the policy go further to specifically recognise rainfall related flood risk. They propose the following amended wording:
  'Ensure that surface water is managed as close to its source as possible, using the following discharge hierarchy: i. Rainwater re-use (rainwater harvesting); ii Discharge into the ground; then iii. Discharge to a surface water body; and then iv. Discharge to a surface water sewer or highway drain or other drainage system.
  Existing flow routes and drainage features within the development site should be identified and preserved e.g. ditches, seasonally dry watercourses, historic ponds.
  To minimise the risk of sewer flooding and protect water quality, surface water will not be permitted to discharge to the foul or combined sewer network.
  Integrate the provision of a Sustainable Drainage System (SuDS) to mitigate the risk of surface water flooding, where viable.'
- **Southern Water** request 'on-site' surface water management is promoted at all relevant sites within the Local Plan due to the significant flood risk posed.
- **Southern Water** support all policy requirements that seek to ensure surface water is appropriately managed as close to source as possible, although, for major development in areas where SuDS are viable, their use should be mandated.
- **Network Rail** support the approach to dealing with flood risk. However, they want to raise the importance of considering the impacts of new development on the rail network in areas of flood risk where there is a close proximity to a railway, in particular, Cosham.

A3.147 The following main issues were raised by general and other consultation bodies on Policy PLP31: Flooding:

- **Premier Marinas** suggest Policy PLP31 is not sound. They state that the policy should be amended to ensure that the provision of flood mitigation, including flood defences is strictly justified and proportionate to the scale of flood risk, including consideration of scheme viability.
- **Premier Marinas** seek continued engagement with the Council and relevant stakeholders.

- **Coastal Partners** are happy with the policy wording. They are content with the recommendation of using upper end climate change allowances to understand the worst-case scenario. They also agree with the approach to basement accommodation.
- **Coastal Partners** want to highlight when the SFRA was produced (2024) and also want a sentence added in to reflect that funding is not guaranteed for the continued maintenance of defences.

Strategic Policy PLP31: Flooding - Council response

How the representations have been taken into account:

- Changes are proposed to paragraphs 8.7; 8.9; and 8.16 respectively in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to the comments made by the Environment Agency. A statement of common ground has also been prepared with the Environment Agency (dated October 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- In response to Southern Water's representation, changes have been proposed to Policy PLP31 in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has also been prepared with Southern Water (dated September 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- No changes are proposed in response to the comments made by Premier Marinas as the Council considers this is already addressed by criterion 1.g) of PLP31: Flooding. A statement of common ground has been prepared with Premier Marinas (dated October 2024) to address the issues they have raised.
- Reference is proposed to be added to paragraph 8.8 of the introduction to Chapter 8: Climate Emergency in the Schedule of Changes to the Pre-Submission Local Plan 2024 to address this point made by Coastal Partners.
- A change is proposed to paragraph 8.25 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to the comments made by Coastal Partners regarding funding.

Development Management Policy PLP32: Sustainable Drainage Systems

	Number of respondents
Total number of respondents	2
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.148 Southern Water request a slight wording change relating to separation of surface water from foul water flows. Hampshire and Isle of Wight Wildlife Trust would like a separate water quality policy to be created: developments in riparian (riverside)

habitats is to be avoided wherever possible, but where unavoidable they provide a list of criteria to be considered including increasing the buffer zone to 20m.

A3.149 The following main issues were raised by specific consultation bodies on Policy PLP32: Sustainable Drainage Systems:

- **Southern Water** support the inclusion of Policy PLP32, however, they propose a slight amendment to criterion 5c. Their proposed wording reads: 'Surface water will be separated from foul water flows within the site or it may be discharged into the sea, a watercourse or surface water sewer. Surface water connections to the foul or combined sewer system will not be accepted.' Southern Water note a potential misalignment within the policy between Policy criterion 5c and the supporting text at 8.45. Southern Water state that the above proposed wording in bullet point 1 would resolve this.

A3.150 The following main issues were raised by general and other consultation bodies on Policy PLP32: Sustainable Drainage Systems:

- **HIWWT** welcome key elements within Policy PLP32, but request an additional policy on water quality is created detailing protection and enhancements of rivers and emphasis on prohibiting development within or adjacent to river corridors which is not considered to be sustainable. HIWWT propose policy wording for scenarios where development in a riparian setting is fundamentally unavoidable.
- **HIWWT** also state that buffer strips of 8 metres near rivers are not sufficient and they should be a minimum of 20 metres.

Development Management Policy PLP32: Sustainable Drainage Systems - Council response

How the representations have been taken into account:

- A change is proposed in the Schedule of Changes to the Pre-Submission Local Plan 2024 to PLP32: 5.c) in response to a comment made by Southern Water. Some new criteria have also been proposed in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has been prepared with Southern Water (dated September 2024) to address the issues they have raised.
- No changes are proposed in response to the HIWWT comments regarding a water quality policy for protection and enhancements of rivers as the Council considers that there are no appropriate rivers located in Portsmouth that would require a policy in the Local Plan. A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.

Development Management Policy PLP33: Sustainable Construction and Onsite Renewable Energy

	Number of respondents
Total number of respondents	7
Respondents who raised soundness	3
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	2

A3.151 Hampshire and Isle of Wight Wildlife Trust are supportive of the policy but request swift boxes, hedgehog highways and bee bricks to be standard requirements in all new development proposals. They would also like water usage targets to be reduced to 90 litres per day per person which can be aided through further support of grey-water recycling and rain harvesting technologies, including mandatory water butts. They are pleased to see policy wording included around cooling measures and would like new developments to consider current and future warmer climates in the design such as the inclusion of awnings, external shutters, blinds.

A3.152 The Home Builders Federation feel that whilst not stated explicitly, new developments effectively need to be zero carbon once built and occupied with the current policy wording. They feel this may not always be 100% viable so language needs to be more flexible to avoid developments being blocked because of this stipulation.

A3.153 PCC LHA suggest referencing the increasing number of EV Vehicles and their associated electricity requirements, plus the potential for them to supply energy back to the grid.

A3.154 Historic England would like the policy to be cross-referenced to chapter 11.

A3.155 The following main issues were raised by specific consultation bodies on Policy PLP33: Sustainable Construction and Onsite Renewable Energy:

- **PCC LHA** state that policy PLP33 needs to reference rising demand for electricity that will result from forecast increasing adoption of electric vehicles. National legislation (the Zero Emission Vehicle Mandate) requires that 80% of new cars and 70% of new vans sold in Great Britain will be zero emission by 2030, increasing to 100% by 2035. This will result in an increased demand for electricity compared to today (potentially a maximum of 10% greater demand, according to the National Grid), and it is essential that additional power demands are met through renewable generation. They say that EVs also have the potential to help balance a more flexible and low carbon grid through developments that allow their batteries to charge at optimum times, known as "smart charging", and to supply electricity in times of high demand, known as "vehicle to grid". They suggest that the above issues and opportunities are identified in an updated version of Policies PLP33/ 34.
- **Historic England** suggest that a new paragraph be added before the current paragraph 8.52, focusing on the implications of paragraph 8.51 regarding embodied carbon i.e. there is a significant amount of embodied carbon in the City's current building stock, elevating the importance of the Council's approach in favour of building retention.
- **Historic England** support this section and in particular the policy's support for retaining existing buildings where possible. That said, to avoid conflict with policy PLP53 (criterion 7), as a minimum they suggest cross-referring to the section of the plan that focuses on the historic environment and acknowledging that the retrofit of traditionally constructed buildings requires a different approach. Cross-reference to chapter 11 is merited.

A3.156 The following main issues were raised by general and other consultation bodies on Policy PLP33: Sustainable Construction and Onsite Renewable Energy:

- **Hampshire Swifts** support item 8 (Swift Boxes) in principle, they suggest integral swift bricks are a much better option than externally mounted boxes as they will last as long as the building itself, have zero maintenance requirements, have better thermal regulation which is crucial in view of future climate change, and aesthetic integration with the design of the building. The policy should follow best-practice guidance, as specified in BS 42021:2022, to ensure swift bricks are installed in suitable locations and in appropriate numbers. It is not currently clear that this policy includes extensions to existing buildings.
- **HIWWT** welcome and support the inclusion of Policy PLP33: Sustainable Construction and Onsite Renewable Energy. In particular, they strongly support the specification that development proposals should incorporate swift boxes. They recommend this policy is strengthened to incorporate swift boxes, bee bricks and hedgehog highways as standard requirements.
- **HIWWT** is pleased to see the requirement for new homes to meet a water efficiency standard of 110 litres per person per day in the draft. They state that the Government in its Plan for Water indicated plans 'to consider mandating a new minimum water efficiency standard for new homes in England of 105 litres per person per day and 100 litres per person per day where there is a clear local need, such as in areas of serious water stress.'
- **HIWWT** state that as part of the Government's commitment to review Building Regulations in order to prevent new development causing issues with water supply, the Future Homes Hub conducted a review of the options and feasibility of tightening water efficiency regulations with wide- ranging input from across the industry. Its final report recommends a target of 100 litres per person per day by 2030, and 90 in water stressed areas. This would be tightened to 90 as standard by 2035 and 80 litres per person per day in water stressed areas.
- **HIWWT** welcome the inclusion of overheating within the policy and the requirement for major development to produce a Sustainability Statement incorporating thermal comfort. Likewise, they welcome referral to the Good Homes Alliance tool and guidance on overheating in new homes. To ensure adaptation concerns are considered to the same degree as energy. HIWWT recommend the Plan draw on the example of the "cooling hierarchy" in the London Plan Policy SI 4 Managing heat risk, whereby major development proposals should demonstrate through the Sustainability Statement how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy. Policies should be added to look favourably on and encourage the installation of relevant adaptation and resilience measures, such as external wooden shutters, awnings and blinds. In addition to requiring dynamic thermal modelling associated tools and methodologies, it should be specified that datasets must be used to ensure that all new development is designed for the climate it will experience over its design life and future climate scenarios, not just present conditions.
- The **HBF** have a number of concerns with this policy. Part 1 makes a very broad statement that development will be permitted where it is designed to reduce their impact on the environment during construction and the scope of this policy. They ask if the policy refers to reducing carbon emissions during construction or if there are wider environmental considerations that must be taken into account. Vague policies such as this are neither helpful to the developer or decision maker and as such are unsound as

they are inconsistent with paragraph 16d of the NPPF. More clarity is needed if part 1 is to be included in the Local Plan.

- The **HBF** highlight that Part 3 of the policy in effect requires development to take a fabric first approach to building design that minimises energy demand with any residual demand for energy being delivered from renewable energy technologies. It must be recognised in part 3 that there will be circumstances, even where energy demand has been minimised, when a development cannot meet all of its energy demands from renewable energy technologies, either due to viability or that it is simply not possible to achieve on site. As is noted above the viability of many sites in Portsmouth would appear to be marginal and the Council will therefore need to be flexible in how this policy is applied in order to ensure the development remains deliverable across the plan period.
- An individual flagged that retrofit is an increasing sector of the building industry. Demolition wastes the embodied energy of standing buildings and the energy used in their construction, transport to the site, not to mention the operational energy consumed when they were in use. By embracing and repurposing our heritage, we honour the past and unlock new economic opportunities for the city, inspiring future generations, and fuelling sustainable growth. This approach also provides space for creatives to thrive and innovate. New homes can be provided by converting existing buildings as well as newbuild.

Development Management Policy PLP33: Sustainable Construction and onsite Renewable Energy - Council response

How the representations have been taken into account:

- In response to representation by PCC LHA, the Council has not proposed any changes referencing electric vehicles as this is outside the main area of focus of Policy PLP33. A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- A statement of common ground has been signed with the Historic England (dated 2025) addressing the issues they have raised.
- In response to comments made by Hampshire Swifts, the Council has proposed a change to criterion 8 in the Schedule of Changes to the Pre-Submission Local Plan 2024.
- In response to comments by Hampshire Swifts and HIWWT, the Council has proposed amendments to para 8.65 in the Schedule of Changes to the Pre-Submission Local Plan 2024.
- No change has been made in response to the concern raised by HIWWT regarding the levels suggested for water usage targets as the Council does not have specific evidence to justify an alternative standard.
- A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- To ensure clarity, the Council has proposed to add a new para, 8.55 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in respect of impact during construction in response to the concern raised by the HBF.
- As the Council's evidence base supports the emerging policy position, the Council has not made changes to address the concern raised by HBF regarding flexibility of the application of the policy as this was considered to potentially weaken the policy.

Development Management Policy PLP34: Renewable Energy

	Number of respondents
Total number of respondents	5
Respondents who raised soundness	2
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.157 Respondents' comments are supportive of the policy, particularly around wind turbines and photovoltaic arrays. Two comments mention positively the likely use of Portsdown Hill as a site for renewable energy infrastructure. The MoD requests a slight wording change.

A3.158 The following main issues were raised by specific consultation bodies on Policy PLP34: Renewable Energy:

- **Historic England** note that PLP34 does not refer to the historic environment and how potential impacts are assessed, which may cause a failure to align with national policy on

the historic environment. They provide suggested detailed wording on an amended Criterion 1 of PLP34, to also address the natural environment.

- **Historic England** suggest additional wording in regard to para 8.73 that 'The City has areas which are covered by a variety of designations for ecology, historic and landscape reasons. Solar photovoltaic array and wind turbine proposals will therefore need to ensure that there will be no direct or indirect adverse impacts upon these designated sites and assets, or that those impacts can be made acceptable. From a heritage perspective, potential impacts are assessed through heritage impact assessment, which includes consideration of any impacts on the setting of heritage assets. This is complemented by landscape and visual impact assessment. In addition, the impact of development on the amenity.'
- **Fareham Borough Council** highlight that they would welcome any further opportunities for joint working on the strategic approach to Portsdown Hill, together will Winchester District Council and Havant Borough Council, including as a consultee on development proposals.
- **PCC LHA** state that policy PLP33 needs to reference rising demand for electricity that will result from forecast increasing adoption of electric vehicles. National legislation (the Zero Emission Vehicle Mandate) requires that 80% of new cars and 70% of new vans sold in Great Britain will be zero emission by 2030, increasing to 100% by 2035. This will result in an increased demand for electricity compared to today (potentially a maximum of 10% greater demand, according to the National Grid), and it I essential that additional power demands are met through renewable generation.
- **PCC LHA** state that EVs also have the potential to help balance a more flexible and low carbon grid through developments that allow their batteries to charge at optimum times, known as "smart charging", and to supply electricity in times of high demand, known as "vehicle to grid".
- **PCC LHA** suggest that the above issues and opportunities are identified in an updated version of Policies PLP33/ 34.

A3.159 The following main issues were raised by general and other consultation bodies on Policy PLP34: Renewable Energy:

- **Portsmouth International Port** support the policy, noting the policy is subject requires the avoidance of adverse impacts.
- **The DIO (for MoD)** support PLP34, and Paragraph 8.72. They request the addition of the following words: '…. potential impact upon Ministry of Defence sites/facilities around the city.'
- An individual strongly supports PLP34. He notes how it aligns with the new Government agenda for house building and infrastructure, with the NPPF, and with Paragraph 3.31 concerning the net zero-carbon city. The policy will reduce reliance on foreign energy supplies and supply new homes and large areas of industry.
- One individual suggests studies be carried out for wind turbines along the top of Portsdown Hill, and possibly other sites.

Development Management Policy PLP34: Renewable Energy - Council response

How the representations have been taken into account:

- A statement of common ground has been signed with the Historic England (dated 2025) addressing the issues they have raised.
- In response to comments made by the DIO (for MoD), the Council has proposed amendments to para 8.72 in the Schedule of Changes to the Pre-Submission Local Plan 2024.
- In response to PCC LHA, the Council has not proposed any changes referencing electric vehicles as this was outside the main area of focus of Policy PLP34. A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- No change has been made in response to a comment made by an individual regarding wind turbines on Portsdown Hill. This was considered in the 2010 feasibility study for large scale wind turbines in Portsmouth. No land on Portsdown Hill has ever been promoted for this use.

Development Management Policy PLP35: Air Quality and Pollution

	Number of respondents
Total number of respondents	6
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.160 Responses are generally supportive of the policy. Some would like the Health Impact Assessment to be more comprehensive, not just focus on air quality as a health determinant. They also point out that there is no robust governance of the HIA process.

A3.161 Others suggest additions to the policy such as mentioning the Seachange project at Portsmouth International Port, referencing WHO statements on air pollution and its associated health risks, referencing LTP4 and adding Transport Assessments.

A3.162 One comment also calls for much stronger action on air pollution restricting any additional motor vehicles into the City.

A3.163 The following main issues were raised by specific consultation bodies on Policy PLP35: Air Quality and Pollution:

- **Natural England** outline that the Plan is supported by detailed air quality modelling and assessment. Based on the information presented, they agree with the conclusions of the Plan sHRA.
- **PCC LHA** raise that regarding Policy PLP35: Air Quality and Pollution (particularly paras 8.86 and 8.87) the connection being made to transport and the need for parallel consideration of transport assessments is lacking. The supporting wording at present states that Health Impact Assessments (HIAs) should be closely aligned with Air Quality Impact Assessments (AQAs), but not Transport Assessments (TAs). They know that at

least half of air pollution in the city derives from transport sources, therefore, HIAs, AQAs and TAs should all go hand-in-hand.

- **PCC LHA** state that there is the potential for this policy to also reference the Cleaner Air objective in LTP4. A statement such as the below could/should be included:
  'All development plans can influence air quality in a number of ways, for example through what development is proposed and where, and the provision made for sustainable transport. Consideration of air quality issues at the plan-making stage can ensure a strategic approach to air quality and help secure net improvements in overall air quality where possible. Transport needs to be considered in terms of what, where and the transport provisions/impact.'
- **PCC LHA** state that the potential cumulative impact of a number of smaller developments on air quality as well as the effect of more substantial developments, including their implications for vehicle emissions, should be considered.

A3.164 The following main issues were raised by general and other consultation bodies on Policy PLP35: Air Quality and Pollution:

- **Portsmouth International Port** raise that given the national and local strategic importance of the Seachange project (Sea Change - Portsmouth Port (portsmouth-port.co.uk) this should be mentioned in the plan.
- **NHS property services** state that Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. One of the ways in doing so is through the requirement of a Health Impact Assessment (HIA). They recognise that the Local Plan will require HIAs under Draft Policy PLP23 for proposals which are part of estate renewal schemes and under Draft Policy PLP35 with specific regard to impact on air quality. They recommend that either Draft Policy PLP35 is amended to be clear that the HIA required for major development proposals must be comprehensive and not solely limited to air quality considerations, or that the Local Plan include a separate policy requiring a comprehensive HIA to cover all relevant considerations at the thresholds set by Draft Policy PLP35 for major developments.
- **PCC Public Health** suggest that to address the ongoing threat of air pollution to the health of the city's residents and visitors, they would like to see the guidance supporting this policy reference WHO statements about the high environmental risk of air pollution, and that there is no safe level. They state that air pollution is one of the greatest environmental risks to health. By reducing air pollution levels, countries can reduce the burden of disease from stroke, heart disease, lung cancer, and both chronic and acute respiratory diseases, including asthma. There is no evidence of a safe level of exposure or a threshold below which no adverse health effects occur.
- **PCC Public Health** welcome the focus on air pollution and the requirement for major development proposals to undertake a Health Impact Assessment (HIA), however they highlight that there are many other aspects of the built environment which impact upon residents' health and wellbeing (the wider or social determinants of health), and this is the only policy in the Local Plan which explicitly mentions HIA. This might lead developers to consider that air pollution is our only health concern, and to overlook other factors which could serve to widen inequalities. They argue that a formalised 'health in all policies' approach, with HIA referenced more routinely within policies, would lead to more robust assessments being undertaken by developers and their consultants.
- **PCC Public Health** are concerned that Assurance mechanisms for delivery of HIA are missing - i.e. there appears to be no must-do or governance structure for responding to

HIA and how it fits into the development process, with no indicators included in the monitoring section on p.284-5.

- One individual flags that Portsmouth is one of the most densely populated areas outside of London and has experienced levels of nitrogen dioxide higher than the legal limit. They refer to their own health concern which a Consultant had told them was likely caused by car pollution. They state that the island is surrounded by cars, and any housing development must be either car-free or electric. Access to the City by cars should be restricted.

Development Management Policy PLP35: Air Quality and Pollution - Council response

How the representations have been taken into account:

- No change is proposed in response to the PCC LHA comment regarding the need for Transport Assessment as this is covered by the requirement for Transport Assessments under policy PLP47.
- The PCC LHA comments regarding air quality and need for assessment of its impacts have been addressed for the City through the Portsmouth Emissions Based Assessment and Portsmouth City Centre Road Scheme – Air Quality Assessment of the Local Plan. A statement of common ground has been prepared with the PCC LHA (dated November 2024) covering the issues they have raised.
- The Portsmouth International Port's comments regarding the Sea Change project are noted but no change has been proposed as the policy does not go into the level of detail of listing all air quality related projects in the City.
- The Council has proposed amendments to Policy PLP35.3 and paragraph 8.82 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to the concern raised by NHS property services re Health Impact Assessment, the Council has also undertaken a Health Impact Assessment of its Local Plan as part of its Integrated Impact Assessment.
- In response to comments made by PCC Public Health, the Council has proposed an amendment to paragraph 8.80 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in respect of reference to the World Health Organisation guidelines. A statement of common ground has also been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.
- In response to the comment made by an individual about going car free, no change is proposed as the allocation sites in the City promote low levels of car parking.

Development Management Policy PLP36: Coastal Zone

	Number of respondents
Total number of respondents	4
Respondents who raised soundness	2
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.165 Milton Neighbourhood Forum request that Longshore Way should be included in the Coastal Zone Boundary because of its important natural habitats. Hampshire and Isle of Wight Wildlife Trust state that wording be added to steer development away from areas of high coastal erosion risk throughout its expected lifetime using the most up-to-date climate modelling available.

A3.166 The following main issues were raised by specific consultation bodies on Policy PLP36: Coastal Zone:

- **Historic England** ask that development proposals in the Coastal Zone, as defined on the Policies Map, will be permitted where they:
  'c) Conserve and enhance the character of the Coastal Zone, taking account of the contribution made designated and non-designated heritage assets.'
- **Historic England** suggest that when describing the benefits of green spaces in cities, the plan should also recognise that the natural environment and the historic environment are integral to each other. An integrated approach, such as that promoted by Historic England, Natural England and the National Lottery Heritage Fund in its joint statement (https://historicengland.org.uk/content/docs/advice/joint-statement-naturalengland-historicengland-nlhf/), has the potential to deliver multiple benefits.

A3.167 The following main issues were raised by general and other consultation bodies on Policy PLP36: Coastal Zone:

- **Milton Neighbourhood Planning Forum** identify that the Coastal Zone Boundary excludes Longshore Way with the exception of the Sailing Club but the PLP36 is intended to 'conserve and enhance the character of the Coastal Zone.' Longshore Way should be included.
- **HIWWT** welcome the official inclusion of a development management policy designed to deliver sustainable development in the coastal zone. However, in line with Core Policy PLP2: Climate Emergency, and both existing duties and national policy to consider climate change adaptation, they recommend this policy be strengthened to include specific reference to climate adaptation and the need for development in the coastal zone to be safe from coastal change for its lifetime in line with the NPPF and Climate Change Act. They suggest the policy should have additional words that ensure that development is steered away from areas of high coastal erosion risk unless there is mitigation demonstrated in all modelled scenarios for the lifetime of the development.
- **The Woodland Trust** state that the Coastal Zone benefits from two important trees on Governors Green: a notable Wych Elm and a veteran Elder. They therefore, recommend adding wording to the policy point c) 'Conserve and enhance the character of the Coastal Zone including important trees.'

Development Management Policy PLP36: Coastal Zone - Council response

How the representations have been taken into account:

- A statement of common ground has been signed with Historic England (dated 2025) to address the issues they have raised.
- The coastal zone boundary is proposed to be redrawn in the Schedule of Changes to the Pre-Submission Local Plan 2024 by providing a replacement figure in Appendix 1. Two changes have been agreed with the Milton Neighbourhood Forum but there is one remaining matter of disagreement. This is documented in the statement of common ground with Milton Neighbourhood Planning Forum (dated August 2024).
- No changes have been made in response to the HIWWT comments regarding coastal erosion as these are already addressed in Policy PLP31. A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- No changes have been made in response to the Woodland Trust's comments re trees as these are already covered by Policy PLP 41 and do not require specific criteria in this policy.

Development Management Policy PLP37: Contaminated Land

	Number of respondents
Total number of respondents	1
Respondents who raised soundness	1
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.168 The one respondent's comment is in support of the policy and its intention to ensure that the natural environment is protected and raised no objections.

A3.169 The following main issues were specific consultation bodies on Policy PLP37: Contaminated Land:

- **Environment Agency** support the policy and its intention to ensure that the natural environment is protected.

A3.170 No comments were received from general or other consultation bodies on Policy PLP37: Contaminated Land.

Development Management Policy PLP37: Contaminated Land - Council response

How the representations have been taken into account:

- No changes are proposed to this policy as only one response was received which was in support of the policy.

Chapter 9: Greening the City

	Number of respondents
Total number of respondents	6
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.171 Hampshire and Isle of Wight Wildlife Trust express concern that the proposed developments can be delivered given environmental limitations such as water and drainage infrastructure. They would also like the plan to be more ambitious in its green infrastructure plans and go beyond statutory 10% BNG targets.

A3.172 Langstone Harbour Board urge the plan to also consider the preservation and enhancement of 'blue space' not just green space.

A3.173 PCC Transport would like initiatives such as Active Pompey Neighbourhoods, green roofs on bus shelters, and parklets alongside highways to be referenced in the policy.

A3.174 The following main issues were raised by specific consultation bodies on Chapter 9: Greening the City.

- **PCC LHA** commented that the LHA is, or can deliver capital schemes which can contribute to the greening agenda - such as planting as part of walking and cycling schemes and within neighbourhood accessibility schemes (e.g. Active Pompey Neighbourhoods), and through provision of green roofs on bus shelters and parklets on parts of the highway in town/ neighbourhood centres, and through Sustainable Urban Drainage Schemes as part of new/ improved highway schemes. The LHA is supportive of the greening agenda and believe that reference to the above ways in which the LHA can contribute to greening of the city should be added where appropriate in this chapter.
- **Historic England** believe the plan should recognise that the natural and historic environment are integral to each other.

A3.175 The following main issues were raised by general and other consultation bodies on Chapter 9: Greening the City:

- **Milton Neighbourhood Planning Forum** confirm that the Neighbourhood Plan used much of the same evidence as the Local Plan, therefore the Milton Neighbourhood Plan is compliant with Local Plan policies PLP38, 39, 42, and 43.
- **Friends of Old Portsmouth Association** flag that the protection of the habitat of small/garden birds is missing, and the protection of existing hedgerows is not detailed, suggesting that the Pre-Submission Plan section 9.43 should explicitly describe the protection of hedgerows, and that policies should apply to existing sites and not just new developments.
- **HIWWT** suggest that in planning for the housing needs of the district, the Council must be confident that the environment can accommodate the cumulative effects of development at this scale. Environmental limitations must be considered, such as the water and drainage infrastructure being overwhelmed.
- **HIWWT** state that the ecological map (and when in place the LNRS) should also be referred to when deciding site allocations so there are no conflicts between new developments and plans for landscape recovery needed to reach the Government's biodiversity targets.

- **HIWWT** state that the Council have the opportunity to deliver ambitious green infrastructure and creation and enhancement of nature which goes above and beyond the minimum 10% Biodiversity Net Gain.
- The **Langstone Harbour Board** suggest that provision is made for the inclusion of green spaces and the health and wellbeing benefits that they provide. They flag that there is no mention of blue spaces and the multitude of benefits that they are proven to bring. They suggest that the Plan should include provision for exploring opportunities for preserving these blue spaces and facilitating access to them, as highlighted in the Council's Declaration to improve doorstep access to nature.
- The **Langstone Harbour Board** state that Integration with Hampshire County Council's Local Nature Recovery Strategy should be imperative when implementing the opportunities highlighted within the Biodiversity paper.
- The **Langstone Harbour Board** highlight that Natural England periodically conduct reviews on the condition and status of designated sites, of which the Local Plan includes within the Council's authority boundary. A condition review for Langstone Harbour is currently underway, with findings expected to reveal that it is in an unfavourable and declining condition. They suggest that the Local Plan should make reference to this.
- The **Langstone Harbour Board** state that the Local Plan should not only focus on minimising harm, but also on actively contributing to the restoration and enhancement of the natural environment around Langstone Harbour, ensuring that future generations can continue to benefit from its ecological and recreational value.
- An individual quotes the Portsmouth Tree Charter which states that: 'Trees add great beauty and character to the city's landscape, absorb atmospheric pollutants and provide a habitat for birds and other wildlife. These benefits all contribute towards making our city a better place in which to live, work and visit.'

Chapter 9: Greening the City - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- No change has been proposed in relation to comments regarding compatibility of the policies with the Milton Neighbourhood Plan as the plan does not specifically comment on the compatibility of policies in the Milton Neighbourhood Plan. A statement of common ground has also been prepared with Milton Neighbourhood Forum (dated August 2024) to address the issues they have raised.
- No change has been proposed in response to the comments raised by FOOPA re hedgerows as these are already covered by Policy PLP41.
- No change has been made in response to the HIWWT comment regarding being confident the environment can accommodate the impact of plan proposals as this has been tested through the Local Plan HRA.
- No change has been made regarding comments from HIWWT and the Langstone Harbour Board comments regarding Local Nature Recovery Strategies as this is already covered by Policy PLP 39.
- No change is proposed regarding the comment by HIWWT to propose a BNG target of more than 10% as this is already covered in Policy PLP 40.
- A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- A new paragraph is proposed to be inserted beneath paragraph 9.10 forming a new paragraph 9.11 in the Schedule of Changes to the Pre-Submission Local Plan 2024 to add reference to the blue spaces of the Solent, Portsmouth & Langstone Harbours in response to the representation from Langstone Harbour Board.
- The Langstone Harbour Board's comments regarding habitat in the harbour have been noted. Much of the harbour falls outside of the local plan area as it is below the low tide mark. It is addressed through the Hampshire Local Nature Recovery Strategy, and the wider Council is working with local groups to address the Harbour's environment.
- Many of the representations provide general comments rather than requesting specific changes to the introduction to Chapter 9: Greening the City, so no further changes are suggested to this section.

Strategic Policy PLP38: Green Infrastructure

	Number of respondents
Total number of respondents	6
Respondents who raised soundness	3
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	1

A3.176 Respondents are mainly supportive of the policy overall but would like the wording to be strengthened in various ways.

A3.177 Milton Neighbourhood Forum would like point 4 around mitigation to be removed (as a possible loophole).

A3.178 Hampshire and Isle of Wight Trust would like the policy to apply to existing sites as well as new ones, for Building with Nature standards or equivalent to be applied, for thought to be given to nature reserves that may receive increased footfall from nearby new developments, and for the Urban Greening Factor to be higher than that specified in the Natural England Green Infrastructure Framework.

A3.179 Another respondent (PCC Public Health) would like more detail on the proposed green corridors including reason for their location, which species they are designed to protect/enhance, and how active travel through them will be enabled and prioritised. They also suggest including a target for each of the key standards from the Natural England Green Infrastructure Framework.

A3.180 Historic England would like the link to be made between green open spaces and their heritage role, giving explicit examples such as the Hilsea Lines and Southsea Common.

A3.181 The University of Portsmouth cautions that having a tree canopy target of 15% may make the policy undeliverable in dense urban areas such as those in the city centre.

A3.182 The following main issues were raised by specific consultation bodies on Policy PLP38: Green Infrastructure:

- **Winchester City Council** consider Policy PLP38 to be sound and is supported by them. They note that the protection of land at Portsdown Hill as Local Green Space is consistent with the countryside policies applying to adjacent land within the Winchester City Council area.
- **Historic England** state that building on an initial reference to the interaction between the natural and historic environments, the GI background paper acknowledges that many of Portsmouth's green open spaces also play an important heritage role. They encourage the Council to refer explicitly to a couple of examples relevant to Portsmouth: Hilsea Lines and Southsea Common.

A3.183 The following main issues were raised by general and other consultation bodies on Policy PLP38: Green Infrastructure:

- **Milton Neighbourhood Forum** suggest that where Green Infrastructure under PLP38 has been identified in Figure 9.1 there is still an exception in criteria 4 of PLP 38 on page 212 permitting mitigation, criterion 4 therefore, undermines the objectives of PLP38 and should be deleted.
- **HIWWT** welcome the reference to alignment with the Local Nature Recovery Strategy in draft Strategic Policy PLP39: Biodiversity, and the supporting text for Strategic Policy PLP38: Green Infrastructure. They particularly welcome the emphasis on support for delivering ecological networks and areas of high potential for nature restoration and recovery, including linking together protected sites.
- **HIWWT** state that ambitious green infrastructure policy is a vital component for achieving alignment with the Environment Acts targets. They assert that, in line with Core Policy PLP1 Design, the relevant citation of the National Model Design Code, and

recommendations of the Building Better Building Beautiful Commission, suitably maximising green infrastructure is an essential component of well-designed places. Likewise ambitious policy on green infrastructure is essential in order to comply with the relevant directions of the NPPF and duties to consider climate change, notably climate adaptation. Green Infrastructure can, and should, support biodiversity, as well as both mitigation and adaptation efforts related to the climate crisis. They would like to see the Draft Local Plan adapt the green infrastructure policy to set high quality green infrastructure principles across the built footprints of new and existing areas.

- **HIWWT** recommend the Council follow the examples set by other LPAs, and the Welsh Governments wording in Planning Policy Wales, in strengthening the local plans policy requirements to specifically recommend that all proposals for green infrastructure will be expected to be designed with the Building with Nature standards, or an equivalent standard set by the Council.
- **HIWWT** states that for new developments, the Council should recognise that meeting the Suitable Accessible Natural Greenspace (SANG) calculations is the minimum requirement and does not fully mitigate potential impacts to all sites of ecological importance. Developments near nature reserves increase the footfall, which third parties have to bear the cost of. These sites for wildlife, whether they are designated or not, will play a key role in the ecological network and upcoming LNRS.
- **HIWWT** welcome the prospective inclusion of an Urban Greening Factor within the supporting text and the associated green infrastructure strategy. They welcome the interim provision that until such time as the City Council publishes additional guidance, applicants should use Natural England's Urban Greening Factor as set out in its Green Infrastructure Framework using surface cover types and factors. They would recommend that the Council's related planning policy follows the model of the London plan urban greening factor, Policy G5.19. However, given the significant and severe issues of green space and greenery deprivation in Portsmouth, in order to address the scale of nature decline and deliver the relevant public health and pride of place outcomes needed, they recommend setting a higher target minimum score than 0.3 for commercial development and 0.4 for residential developments, as well as ensuring it encompasses all types and sizes of development within the city.
- **HIWWT** welcome relevant wording in Strategic Policy PLP38: Green Infrastructure that: 'development that does not provide onsite green infrastructure will only be permitted where sustainable alternative green infrastructure provision of an equivalent standard is provided in close proximity to the development.' The HIWWT are concerned that the current draft does not include specific wording on the provision of Suitable Alternative Natural Greenspace (SANG) or relevant Strategic Access Management and Monitoring (SAMM) projects and requirements.
- **HIWWT** suggest that in order to ensure a compliant and adequate level of protection for designated sites, the Council must include - and integrate fully - a more detailed policy for the provision of alternative greenspace that is both functional, and of a standard that provides viable habitat alternatives for those areas under pressure on the coast, drawing on SANG and SAMM guidance. The HIWWT recommend the following wording:

  '1) Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of a Special Protection Area (SPA), whether alone or in combination with other development. Where one or more adverse effects on the integrity of the SPA will arise, measures to avoid and mitigate these effects must be delivered and secured in perpetuity. These measures are unlikely to be acceptable unless agreed with Natural England.

2) The following principles apply:
a) There is an "exclusion zone" set at 400m linear distance from the SPA boundary. Permission will not be granted for development that results in a net increase in residential units within this zone. Proposals for other types of development within this zone must undertake Habitats Regulations Assessment to demonstrate that they will not harm the integrity of the SPA.
b) There is a "zone of influence" between 400m and 5km linear distance from the SPA boundary. Where net new residential development is proposed within the zone of influence, avoidance and mitigation measures must be delivered prior to occupation of new dwellings and in perpetuity. Measures must be based on a combination of 1) the provision, improvement and/or maintenance of Suitable Alternative Natural Greenspace (SANG) and 2) Strategic Access Management and Monitoring (SAMM).
c) Residential development of over 50 net new dwellings that falls between five and seven kilometres from the SPA may be required to provide avoidance and mitigation measures. This will be assessed on a case-by-case basis and in consultation with Natural England.
3) The following principles apply to the provision of SANG:
a) A minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) should be provided per 1,000 new occupants.
b) Developments must fall within the catchment of the SANG that provides avoidance, except developments of fewer than 10 net new residential units.
c) The Council will collect developer contributions towards avoidance and mitigation measures, including SANG (unless bespoke SANG is provided) and SAMM.
d) Developments may secure or provide bespoke SANG. Proposals for new SANGs are unlikely to be acceptable unless agreed by Natural England. Large developments may be required to provide bespoke SANG.
4) Where further evidence demonstrates that the integrity of the SPA can be protected using different distance thresholds or with alternative measures (including standards of SANG provision different to those set out in this policy), the Council will agree these in consultation with Natural England.'

- **PCC Public Health** welcome the inclusion of the policy (PLP38) and section on Green Infrastructure and PLP23: Estate Renewal. PLP 23 is supported by Greening Strategy priorities. They ask that, in regard to para 9.18 Tree canopy cover, Urban Greening Factor and Accessible green space, targets be included in the text.

- **PCC Public Health** flag that in terms of green corridors (figure 9.1), it is not clear why they are located where they are, and what species PCC are looking to support. It is also not clear how people may use these (Active Travel). They therefore, suggest that the proposed green corridors need addressing with a defensible and detailed plan.
- The **UoP** highlight that their emerging schemes all strive to replace and enhance natural features and achieve greater than the mandatory biodiversity net gain requirement. This is linked with the University's own environmental sustainability and climate change requirements and objectives.
- The **UoP** notes the introduction of reference to Natural England's Green Infrastructure Standards (see paragraph 9.18) and the specific requirement to increase tree canopy cover by at least 15% against the Natural England standard (see PLP41 Part 1c i.). The rationale for the introduction and use of such a standard is recognised, however the ability to deliver this requirement on major developments needs to be properly

understood to ensure the policy requirement is deliverable. The University objects to this part of the policy until this is explained.

Strategic Policy PLP38: Green Infrastructure - Council response

How the representations have been taken into account:

- A statement of common ground has been signed with Historic England (dated 2025) to address the issues they have raised.
- No change is proposed in response to the Milton Neighbourhood Forum comment regarding mitigation for loss of green infrastructure as the Council considers that mitigating losses to the Green Grid is appropriate.
- In response to the HIWWT comments re targets for the environment, no change is proposed as the Council already refers to the five Natural England GI standards and 15 Principles within the policy.
- The HIWWT comments regarding SANG are considered under Policy PLP39.
- A statement of common ground has been prepared jointly with the RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- In response to comments made by PCC Public Health regarding 15 minute walking distances to open space, the Council has proposed amendments to para 9.23 in the Schedule of Changes to the Pre-Submission Local Plan 2024.
- In response to the PCC Public Health comment regarding a target for tree canopy cover, no change has been proposed as this is already included in Policy PLP41.
- In response to the comment from PCC Public Health regarding Urban Greening Factor no change has been proposed as this is already covered in paragraph 9.21 of the supporting text.
- An amendment to figure 9.1 (the inclusion of Allaway Avenue on the Green Grid) is proposed in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to comments made by PCC Public Health.
- A statement of common ground has been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.
- Further clarity is proposed to be added to Policy PLP41 in the Schedule of Changes to the Pre-Submission Local Plan 2024 regarding tree canopy cover to address the University of Portsmouth's comment.

Strategic Policy PLP39: Biodiversity

	Number of respondents
Total number of respondents	6
Respondents who raised soundness	2
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	2

A3.184 Respondents are supportive of the policy but request various changes to the wording.

A3.185 Milton Neighbourhood Forum and The Portsmouth Society feel that the clauses 2.b)ii) and 2.d)ii) leave loopholes for exploitation. The Portsmouth Society also

queries whether the wording in paragraph 9.52 definitively excludes sites that cannot demonstrate 10% BNG.

A3.186 The Hampshire and Isle of Wight Wildlife Trust propose a full re-write of the guiding principles of the policy, as well as calling for the establishment of a Nature Recovery Network. They would also like an appraisal of both designated and non-designated wildlife sites (e.g. local nature reserves), and sufficient mitigation measures put in place.

A3.187 Historic England would like a reference to be included to consider how changes to natural habitats may also impact physical heritage assets.

A3.188 The following main issues were raised by specific consultation bodies on Policy PLP39: Biodiversity:

- **The Environment Agency** are supportive of this policy and its intention to ensure that the natural environment is protected.
- **Historic England** recommend adding to the text (paragraphs 9.54 and 9.55) that supports implementation of policy PLP39, they highlight that newly created or altered habitats will sit within a historical landscape and may have both positive and negative impacts on setting as well as physical and chemical conditions of heritage assets.

A3.189 The following main issues were raised by general and other consultation bodies on Policy PLP39: Biodiversity:

- **The Woodland Trust** recommend requiring an ancient tree survey of all sites allocated for development. They recommend an exercise to complete the Ancient Tree Inventory (which lists ancient, veteran and notable trees outside woods) across any sites allocated or proposed to be allocated for development, in order to comply with the requirements of the NPPF (paragraph 186c) for the protection of irreplaceable habitats.
- **Milton Neighbourhood Forum** state that Biodiversity priorities under PLP39 are undermined by the option of mitigation elsewhere but again, the principle of the integrity of local wildlife sites is surrendered to the test of 'exceptional circumstances' - see d) ii on page 217. They recommend the text 'unless exceptional circumstances outweighing the adverse effects are clearly demonstrated' in para d) ii be deleted.
- **HIWWT** indicate that, when assessing the ecological impacts of new development, the Council must go beyond policy PLP39 and require a complete appraisal on impacts of both designated and non-designated wildlife sites (e.g. local nature reserves) and sufficient mitigation measures in line with accredited best practice guidance. They suggest the following amended wording for part 1 of the policy (insertions underlined):

  '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, <u>as identified in the Local Nature Recovery Strategy (LNRS).</u> Up-to-date ecological information should be submitted which demonstrates that development proposals:

  A) Retain, protect and enhance features of biodiversity interest (including supporting habitat and commuting routes through the site and taking due account of migratory species) and ensure appropriate and long-term management of those features;
  B) Contribute to the creation of larger improved wildlife habitats through the creation of linkages between sites to create and enhance local and regional ecological networks, <u>and deliver the spatial Local Nature Recovery Strategy priorities;</u>

C) Protect and support recovery of rare, notable and priority species;
D) Seek to eradicate or control any invasive non-native species present on site;
E) Contribute to the protection, management and enhancement of biodiversity for example by supporting the delivery of green infrastructure and Biodiversity Action Plan targets, the Local Nature Recovery Strategy priorities and measures, and enhance Biodiversity Opportunity Areas; and
F) Comply with the mitigation hierarchy as set out in national policy.'

They suggest a deleting 'where possible' from the end of part 2e)i) of the policy. They state that these changes ensure a clearer, more-direct regard is given to local nature recovery priorities in planning as require by the LURA 2023, as the current, generic working of the policy is not sufficient to ensure adequate consideration of the LNRS is embedded in the Plan.

- **HIWWT** welcomes the commitment to establishing a local nature recovery network in the city ecological emergency declaration of December 2021, to ensure this is given due and proper regard in relation to the obligations of the Environment Act 2021 and the LURA 2023's requirement for LPAs to take account of local nature recovery priorities and measures in spatial planning, they strongly recommend that the Council commits to the creation and maintenance of a functioning nature recovery network, as this is a key mechanism through which the biodiversity of the district can be protected enhanced, and ensures this is fully reflected and embedded in the wording o PLP39. They state that the Council should prepare and use the Nature Recovery Network, and Local Nature Recovery Strategy as foundational tools for the Local Plan to: identify areas within the local plan area that are of special importance within the context of the Nature Recovery Network (including existing habitats that are of highest value, areas that buffer existing core habitat, and gaps within the existing ecological network that, if filled, would improve ecological connectivity and reduce fragmentation); assess, identify and prioritise opportunities for ecological enhancement through local land management plans and strategies; identify the best sites for development and those areas where development should be avoided (sites of core importance to the Nature Recovery Network should be protected and development should not result in severance of ecological connectivity within the network); inform the design of any development in such a way that it makes a net contribution to the Nature Recovery Network; inform and target biodiversity net gain delivery and other nature-based solutions; inform the use of building standards that promote biodiverse developments within Local Plans (e.g. Building with Nature standards) to ensure that development targets action to most effectively contribute to restoring nature; send a clear market signal to developers of expectations for all future planning to contribute positively and meaningfully to nature's recovery. The Nature Recovery Network and Local Nature Recovery Strategy should guide where development should not take place to avoid severance of the landscape and ecological corridors.
- **HIWWT** welcome the statement that development proposals should take opportunities to contribute to - and deliver - the aims and objectives of the Local Nature Recovery Strategy (LNRS) where possible support the Green Grid. However, the Council must strengthen this wording to ensure the policy aligns with, and fully reflects, the spatial priorities - and creation and maintenance - of a functioning Nature Recovery Network, and the associated nature recovery objectives, as mapped and required by the Environment Act.
- **HIWWT** states that for new developments, the Council should recognise that meeting the Suitable Accessible Natural Greenspace (SANG) calculations is the minimum

requirement and does not fully mitigate potential impacts to all sites of ecological importance. Developments near nature reserves increase the footfall, which third parties have to bear the cost of. These sites for wildlife, whether they are designated or not, will play a key role in the ecological network and upcoming LNRS.

- **HIWWT** suggest amended wording below for policy PLP38, but it relates more to PLP39:
  '1) Permission will only be granted for development proposals where it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of a Special Protection Area (SPA), whether alone or in combination with other development. Where one or more adverse effects on the integrity of the SPA will arise, measures to avoid and mitigate these effects must be delivered and secured in perpetuity. These measures are unlikely to be acceptable unless agreed with Natural England.
  2) The following principles apply:
  a) There is an "exclusion zone" set at 400m linear distance from the SPA boundary. Permission will not be granted for development that results in a net increase in residential units within this zone. Proposals for other types of development within this zone must undertake Habitats Regulations Assessment to demonstrate that they will not harm the integrity of the SPA.
  b) There is a "zone of influence" between 400m and 5km linear distance from the SPA boundary. Where net new residential development is proposed within the zone of influence, avoidance and mitigation measures must be delivered prior to occupation of new dwellings and in perpetuity. Measures must be based on a combination of 1) the provision, improvement and/or maintenance of Suitable Alternative Natural Greenspace (SANG) and 2) Strategic Access Management and Monitoring (SAMM).
  c) Residential development of over 50 net new dwellings that falls between five and seven kilometres from the SPA may be required to provide avoidance and mitigation measures. This will be assessed on a case-by-case basis and in consultation with Natural England.
  3) The following principles apply to the provision of SANG:
  a) A minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) should be provided per 1,000 new occupants.
  b) Developments must fall within the catchment of the SANG that provides avoidance, except developments of fewer than 10 net new residential units.
  c) The Council will collect developer contributions towards avoidance and mitigation measures, including SANG (unless bespoke SANG is provided) and SAMM.
  d) Developments may secure or provide bespoke SANG. Proposals for new SANGs are unlikely to be acceptable unless agreed by Natural England. Large developments may be required to provide bespoke SANG.
  4) Where further evidence demonstrates that the integrity of the SPA can be protected using different distance thresholds or with alternative measures (including standards of SANG provision different to those set out in this policy), the Council will agree these in consultation with Natural England.'
- **The Portsmouth Society** comment that several the sections of Chapter 9 should be explained more clearly, for example, 2.b.ii on page 217 clearly states that development will NOT be allowed if adverse effects cannot be avoided or mitigated, but then goes on to state that they will be if there is sufficient socio-economic benefits. They suggest that measurement guidance needs to be included here else this is a get out of jail free card for all developments.

Strategic Policy PLP39: Biodiversity - Council response

How the representations have been taken into account:

- A statement of common ground has been signed with Historic England (dated 2025) to address the issues they have raised.
- In response to the issue raised by the Woodland Trust, the Council checked all proposed allocations against the Ancient Tree Inventory. Any trees on proposed allocation sites worthy of protection have been accounted for in the formulation of the policies for those allocations. None have been proposed to be added to the Ancient Trees Inventory.
- No change is proposed in relation to the amendment suggested by the Milton Neighbourhood Planning Forum as the Council considers that this would reduce the flexibility of the policy.
- In response to comments from HIWWT, the Council has proposed amendments to Policy PLP 39 criteria 1, 1.b), 1.e) and 2.e) (reference to the Local nature Recovery Strategy) in the Schedule of Changes to the Pre-Submission Local Plan 2024.
- No change is proposed in response to the HIWWT comment in respect of SANG to accommodate impacts on the SPA as these are already covered by Policies PLP42 and 43 which cover Solent Wader and Brent Goose Sites and Recreational Disturbance. These set out the Bird Aware strategy approach. The HIWWT suggested an alternate approach to SANG which does not reflect local best practice through the SWBGS so no changes have been proposed.
- A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- No change has been proposed in relation to The Portsmouth Society's comment relating to part 2.b)ii) which relates to IROPI, and this allows for compensation when demonstrated.

Development Management Policy PLP40: Biodiversity Net Gain

	Number of respondents
Total number of respondents	10
Respondents who raised soundness	6
Respondents who raised legal compliance	5
Respondents who raised Duty to Cooperate	5

A3.190 Most respondents are supportive of the policy, particularly the 20% BNG target on selected sites, although some would like slight policy wording changes. Milton Neighbourhood Forum observes that where BNG is fulfilled on other sites, rather than the new development, that there is little benefit to residents' quality of life. Hampshire and Isle of Wight Wildlife Trust would like the 20% BNG target to apply to all sites. Natural England suggests using their statutory metric for measuring BNG. The Woodland Trust would like targets for tree cover on these sites in line with emerging policy PLP41. The Home Builders Federation, however, is concerned about the impact of BNG targets in general on developers, and specifically would like

it to be stated overtly in the policy that the 20% target only applies to specific Council-owned sites in the City Centre. The MOD would like to be consulted where any BNG offsetting takes place on land that may fall within any statutory safeguarding zones. One responder raised soundness and duty to co-operate issues concerning BNG around para 9.55.

A3.191 The following main issues were raised by the specific consultation bodies on Policy: PLP40: Biodiversity Net Gain:

- **Environment Agency** are supportive of this policy and its intention to ensure that the natural environment is protected, indicating that it is a positive step towards demonstrating commitment to biodiversity.
- **Natural England** suggest that the statutory metric can be used to measure gains and losses to biodiversity resulting from development. They advise PCC to use this metric to implement development plan policies on biodiversity net gain. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain. The requirement for some development to reach 20% BNG is welcomed by Natural England.

A3.192 The following main issues were raised by general and other consultation bodies on Policy PLP40: Biodiversity Net Gain:

- **Milton Neighbourhood Forum** state that to achieve the quantum of development proposed there is almost certain to be a loss in biodiversity overall. They suggest that the requirement of the minimum 10% net gain on individual development sites is meaningless to residents if off-setting, and mitigation means having to deliver biodiversity enhancements elsewhere; compensation is not enhancement.
- **HIWWT** strongly support the proposition that development proposals within the strategic sites of Portsmouth City Centre and Lakeside, and the allocation site of Somers Orchard, will be permitted where they demonstrate a 20% net gain for biodiversity as accounted for in a Biodiversity Net Gain Plan. However, they encourage the Council to amend PLP40 and set a target for development to go above and beyond the 10% minimum, aiming for at least 20% Biodiversity Net Gain across all new development. Failing to integrate a 20% target risks the Plan's alignment with the Environment Act's target to halt species decline by 2030 and obligations for authorities to conserve and enhance nature across their functions. Previous DEFRA impact assessment for the BNG legislation described 10% as 'the lowest level of net gain that the department could confidently expect to deliver...and thereby meet its policy objectives' due to numerous inhibiting factors. The 2023 State of Nature report identified a 16% reduction in the average abundance of species in the UK since 1970. They suggest that it is imperative the Council follow other LPAs (Guildford and Worthing) and adopt a more widely applicable 20% minimum requirement.
- **Southampton City Council** are in support of the policy. They acknowledge that where development proposals cannot deliver the required level of BNG offsite banks and credits will need to be used. It will be important for Portsmouth City Council and SCC to perform monitoring roles for BNG banks within their respective boundaries and provide reporting as needed to ensure the effectiveness of the credits system.
- **HBF** believe the approach is consistent with legislation and national policy, but recommend that the Council revisit the costs of BNG in the DVA and the potential impact of BNG on allocated sites.
- **HBF** suggest the Council reconsiders one aspect policy the 20% requirement on strategic sites in Portsmouth City Centre. While paragraph 9.54 states that this will only

apply on council-owned sites HBF consider it necessary for this to be overtly stated in the policy itself to ensure that their full clarity as to the Council's policy and that it is not applied to other sites in the city.

- The **DIO (for MoD)** request that, when drafting policy and guidance which addresses biodiversity, ecology, and Biodiversity Net Gain, PCC bear in mind that some forms of environmental improvement or enhancement may not be compatible with aviation safety. Where off-site provision is to provide BNG, the locations of both the host development and any other site should both/all be assessed against statutory safeguarding zones and the MOD should be consulted where any element falls within the marked statutory safeguarding zone.
- **The Woodland Trust** support point 1c), higher targets for BNG within the plan increase the chances that an average net gain of at least 10% will be delivered across the City area, given the possibility that some sites may not be able to deliver net gain within the City boundary, or that initiatives intended to deliver such gain may fall short in practice.
- **The Woodland Trust** is developing an approach based on tree equity with PCC which targets urban tree planting to areas of greatest need. Lakeside (PLP5) and Somers Orchard (PLP15) both have a high priority for trees on the UK Tree equity score, while City Centre North (PLP6) has current tree cover of 9%, significantly below the 15% policy target. Prioritising urban tree cover as part of BNG would be a sound policy in line with NPPF para 136.
- **The Portsmouth Society** request that 9.51 be made clearer on whether development without 10% BNG will be accepted or not, their view is that this should be non-negotiable.
- An individual commented that the Local Plan is unsound and does not comply with the Duty to Co-operate with regard to BNG. He asserts that the policy does not go far enough with regards to incorporating 'Swift nest bricks.'

Development Management Policy PLP40: Biodiversity Net Gain - Council response

How the representations have been taken into account:

- Differing objectors mainly have differing ideas on what the target levels of BNG should be. MNPF, the Woodland Trust and HIWWT suggest higher while the HBF suggest lower. The Council's proposed approach generally reflects the national requirement, and as a result, no changes are proposed.
- The DIO's comments regarding safeguarding zones are noted. Where safeguarding zones are known (such as for Policy PLP 9) they have been included in policy.
- No change is proposed regarding the comment from individuals regarding swift bricks as these have already been included in policy PLP33.

Development Management Policy PLP41: Trees & Hedgerows

	Number of respondents
Total number of respondents	5
Respondents who raised soundness	3
Respondents who raised legal compliance	3
Respondents who raised Duty to Cooperate	3

A3.193 Respondents are supportive of the policy.

A3.194 Hampshire and Isle of Wight Wildlife Trust would like the tree canopy target increased to 25% and for tree replacement to be on a two trees for every tree lost basis, rather than 1:1. They also suggest that tree surveys and Arboricultural Impact Assessments should be mandatory requirements.

A3.195 The Woodland Trust would like the Ancient Tree Inventory to be completed.

A3.196 PCC (Environmental Health) would like a time target to be set on tree canopy targets e.g. 15% within 20 years. Also to use the CAVAT (Capital Asset Value for Amenity Trees) tree replacement calculator rather than simple 1:1.

A3.197 No responses were received from specific consultation bodies on Policy PLP41: Trees and Hedgerows.

A3.198 The following main issues were raised by general and other consultation bodies on Policy PLP41: Trees & Hedgerows:

- **HIWWT** support and welcome the proposed policy with regards to achieving the Council's Greener Vision and ambition to double tree cover over the next 25 years, but suggest that, for the Council to achieve its aims and legal objectives, they recommend its ambition is increased in line with wider best practice, guidance and policies. They suggest the policy should seek to maximise the ecosystem services delivered by trees and green infrastructure in order to meet the legal targets for air quality under the Environment Act, consider climate change and the requirements of the Levelling up and Regeneration Act (2023).
- **HIWWT** note that 25% canopy cover is considered good, and that some sites can achieve up to 35%. As such, the Policy should require at least 25% canopy cover. It is suggested that the required replacement planting should be at a ratio of 1:2 to account for sapling die off, that the relevant British Standards should be required to be followed through the policy and that the policy requires Tree Protection Plans and Arboricultural Method Statements where necessary.
- **HIWWT** suggest that further SPDs should seek to maximise the multi-functional benefits of tree planting.
- **Churchill and McCarthy Stone (represented by The Planning Bureau)** note that the NPPF requires plans to be prepared positively in a way that is aspirational yet achievable and suggest that the proposed 15% canopy cover requirement may not be achievable, and in some cases tree replacement may be better off site to create tree lined streets and in public orchards. They suggest that the 15% canopy cover requirement is removed or reconsidered to allow more flexibility, because it could jeopardise the viability of otherwise sustainable development, especially on smaller brownfield sites.
- **PCC Public Health** suggest that a more appropriate replacement requirement than on a 1:1 basis would be for developers to carry out a CAVAT assessment and replace felled trees with replacements of equal or greater CAVAT value.

- The **UoP** indicate that the policy is unsound as the ability to deliver part 1.c)i) of the policy on major development needs to be properly understood to ensure the policy requirement is deliverable.
- **The Woodland Trust** consider that the policy of 1:1 replacement does not align with Biodiversity Net Gain requirements and the overall aim to increase tree cover, but otherwise support the requirement of 15% canopy cover and the protection of ancient/veteran trees. They suggest that the wording around replacement planting should be amended to 'at a minimum of 1:1' to allow for a higher number of replacement trees.

Development Management Policy PLP41: Trees & Hedgerows - Council response

How the representations have been taken into account:

- In response to comments from the HIWWT an enhanced position on tree replacement has been added to the policy in the Schedule of Changes to the Pre-Submission Local Plan 2024. No change is proposed regarding air quality and climate change as these are already covered in policies PLP2 and PLP35. A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- In response to the issues raised by Churchill and McCarthy Stone, additional detail is proposed to be added to the policy in relation to 15% Tree Cover Canopy in the Schedule of Changes to the Pre-Submission Local Plan 2024. A 20 year period is proposed to be included which makes the requirement easier to meet by adding flexibility.
- Some changes have been proposed against policy PLP41 in the Schedule of Changes to the Pre-Submission Local Plan 2024 as a result of comments raised by PCC Public Health. A statement of common ground has been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.
- Amendments are proposed to PLP40 criterion 1.c)i) in the Schedule of Changes to the Pre-Submission Local Plan in response to comments from the UoP.
- In response to comments from the Woodland Trust, the Council has proposed amendments to Policy PLP41 criterion 1(c)ii) and para 9.65 on the Schedule of Changes to the Pre-Submission Local Plan 2024 to provide an enhanced position in respect of replacement trees, and the wording has been agreed with PCC public health and the arboricultural officer.

Strategic Policy PLP42: Solent Waders and Brent Geese Sites

	Number of respondents
Total number of respondents	3
Respondents who raised soundness	1
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	0

A3.199 Respondents are supportive of the policy.

A3.200 The RSPB and the Hampshire and Isle of Wight Wildlife Trust would like a commitment to three years of consecutive surveys at sites adjacent or functionally linked to SPAs. The RSPB supplies some additional text they would like to see included. Natural England also suggests some tweaks to the wording to remove reference to the worked examples and costings in paragraph 9.75 as the related strategy guidance is currently being updated.

A3.201 The following main issues were raised by specific consultation bodies on Policy PLP42: Solent Waders and Brent Geese Sites:

- **Natural England** welcome that the Plan has a bespoke policy on Solent Wader & Brent Geese sites. They highlight that the strategy is currently undergoing its 5-year review, and so also welcome the reference to future updated guidance (PLP42(2)). As part of the review, they are expecting to remove the worked examples and costings referred to in paragraph 9.75 of the Plan so suggest removing this reference.

A3.202 The following main issues were raised by general and other consultation bodies on Policy PLP42: Solent Waders and Brent Geese Sites:

- **HIWWT** welcome the inclusion of policy PLP42, especially the references to, and inclusion of, the Solent Waders and Brent Goose Strategy. It is crucial that the recommendations and key guidance within this strategy are properly and systematically reflected across the strategic allocations and sites within the plan. Particularly to ensure plans and measures are based on a spatial analysis of three years of up-to-date field survey data, and that the relevant mitigation best practice, as recommended within the Strategy, is followed.
- **RSPB** raise concerns regarding the policy wording associated with the protection of Solent Wader and Brent Goose Strategy (SWBGS) sites; these are sites beyond the boundary of the Solent Special Protection Areas (SPAs) that provide a supportive function for populations of species for which the sites are designated. The Solent Wader and Brent Goose Strategy (SWBGS) is a conservation partnership project which aims to conserve the internationally important Brent Goose and wading bird populations within and around the SPAs and Ramsar wetlands of the Solent coast. They highlight that Policy PLP42 appropriately recognises the SWBGS and sets out the need to provide mitigation when functionally linked sites are impacted. However, they assert that it fails to state the underlying principle of this strategy, which is wherever possible to conserve extant sites and enhance the quality and extent of feeding and roosting resource.
- **RSPB** suggest the following wording change for policy PLP42: additional text (underlined) should be added to Policy PLP42, part 1, as follows: 'Functionally linked sites which are used by Solent Waders and /or Brent Geese, as shown on the Solent Waders and Brent Goose mapping, will <u>wherever possible be conserved and opportunities to enhance the quality and extent of feeding and roosting resource encouraged. These sites will</u> be protected from adverse impacts commensurate to their status in the hierarchy in the Solent Waders and Brent Goose Strategy.'
- It should be noted that the **RSPB** made specific comments relating to Solent Waders and Brent Geese Sites in regard to policies PLP3, 4, 5, 8, 9, 11, and 13. The main issues raised by the RSPB on these sites are set out under the relevant policies in this document.
- **RSPB** highlight that SWBGS Mitigation Guidance (SWBGS Steering Group, 2019) document outlines that should site classification, and therefore its function as supporting habitat to the SPA, be disputed reclassification of a site will be considered if confirmed by three consecutive years of survey to the agreed survey methodology under appropriate

habitat management conditions for waders and/or Brent Goose usage throughout the survey period.

- **RSPB** highlight that, the SWBGS Mitigation Guidance provides additional wording around Candidate Sites, which have records of large numbers of waders or Brent Geese but have been recorded less than three times from 2006/2007 to present day. Therefore, in the particular case of Candidate Sites, further surveys are necessary to determine the classification of the site. Upon survey effort, it is likely that these sites will fall into the higher use categories, for example Core Area, Primary Support Area and Secondary Support Area. For some sites, where there has only been one survey to date, two years of data may be necessary.

Strategic Policy PLP42: Solent Waders and Brent Geese Sites - Council response

How the representations have been taken into account:

- The Council has proposed amendments to para 9.75 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to comments from Natural England regarding worked costings.
- In response to comments from RSPB, the Council has proposed amendments to criterion 1 in the Schedule of Changes to the Pre-Submission Local Plan 2024.
- A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- The publication of updated SWBGS Mitigation Guidance provides the latest position regarding the need for survey for different categories of SWBGS sites.

Strategic Policy PLP43: Recreational Disturbance on International Nature Designations

	Number of respondents
Total number of respondents	2
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.203 Respondents support the policy. Hampshire and Isle of Wight Wildlife Trust would like the policies to go even further and to include non-designated wildlife sites as well.

A3.204 The following main issues were raised by specific consultation bodies on Policy PLP43: Recreational Disturbance on International Nature Designations:

- **Natural England** flag that research has shown that new housing around the Solent will lead to more people visiting the coast for leisure, potentially causing additional disturbance to bird species such as dark-bellied brent geese and wader species protected under the Solent and Southampton Water SPA, Portsmouth Harbour SPA and Chichester and Langstone Harbours SPA. They note that PLP43 addresses potential recreational disturbance impacts to internationally-designated sites. They agree that the Solent Recreation Mitigation Partnership (SRMP) i.e. Bird Aware, is an ecologically sound and robust mitigation and avoidance strategy. They highlight that the SRMP is designed to mitigate and avoid the in-combination impacts from development across the Solent region, but there may be instances where a development proposal may pose

impacts to a site alone, which will require further consideration through the Habitats Regulations Assessment process. The potential for recreational disturbance impacts are covered by PLP39 and covered in supporting text paragraph 9.82.

- **Natural England** comment that SPA Qualifying Features are considered throughout the Plan sHRA and Natural England welcome policy PLP43(3).

A3.205 The following main issues were raised by general and other consultation bodies on Policy PLP43: Recreational Disturbance on International Nature Designations:

- The **HIWWT** recommends that the policy goes further to address recreational disturbance, to fully integrate relevant migration, alternative green space provision and management and monitoring best practice. They suggest that the policy should include recreational impacts on both designated and non-designated wildlife sites which is currently missing from the policy wording. They assert that failure to fully consider non-designated sites risks damage to key nature recovery sites potentially conflicting with the priorities of the LNRS.

Strategic Policy PLP43: Recreational Disturbance on International Nature Designations - Council response

How the representations have been taken into account:

- The Council welcomes Natural England's support for the Solent Recreation Mitigation Partnership. Changes are proposed in the Schedule of Changes to the Pre-Submission Local Plan 2024 to Policy PLP43, 3. to reference visual disturbance. A new supporting paragraph is also proposed to be added at paragraph 9.87 to address the points raised by Natural England. The Council considers that these changes will strengthen the policy as requested by Natural England.
- HIWWT's comments request detail to be covered which is already available in the Solent Recreation Mitigation Strategy, and so no change is proposed. The latest mitigation strategy provides a revised and updated position. A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.

Strategic Policy PLP44: Nutrient Neutrality in International Nature Designations

	Number of respondents
Total number of respondents	5
Respondents who raised soundness	1
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.206 Respondents are supportive of the policy but suggest minor amendments to either wording or emphasis.

A3.207 Southern Water would like a wording tweak to the wastewater treatment works text.

A3.208 Hampshire and Isle of Wight Wildlife Trust would like more focus on BNG and nitrate mitigation schemes to protect rivers and water quality.

A3.209 Natural England advise that a more precautionary bespoke water use calculation would be appropriate for proposed hotels.

A3.210 The following main issues were raised by specific consultation bodies on Policy PLP44: Nutrient Neutrality in International Nature Designations:

- **Southern Water** welcome and support the inclusion of a policy promoting Nutrient Neutrality. They suggest the following: 'Upgrades to wastewater treatment works will generally be supported due to their purpose of environmental protection.'
- **Natural England** highlight that there are impacts on nationally and internationally designated sites in the Solent Catchment arising from excessive nutrients entering the water environment, their view is that there is likely to be a significant effect on internationally designated sites in the Solent catchment due to the increase in wastewater from new housing. NE state that PLP44 ensures that any new development posing a likely significant effect to designated sites through wastewater will not cause an adverse effect to the integrity of designated sites. Natural England have previously agreed the use of the Interim Nutrient Neutral Mitigation strategy (INNMS). The Plan's sHRA is supported by a plan level nutrient budget. Natural England agree with the conclusions of the sHRA regarding the plan level budget and expected mitigation requirements across the plan period.
- It is **Natural England**'s view that competent authorities may choose to adopt bespoke calculations on occupancy rates for detailed planning applications, if sound evidence is available. They note that occupancy rates for HMOs and hotels are considered in paragraph 6.88 onward in the Plan sHRA. These paragraphs make reference to documents appendix 2 and 3 and appendix 5. These are appendices from the Portsmouth City Council Nutrient Budget not the plan sHRA. Natural England have been sent these documents as part of the Reg 19 consultation. A water use figure for hotels of 55 litres per person per day is proposed, based on data from Energy and carbon implications of rainwater harvesting and greywater recycling (Environment Agency, 2010). The British Water Code of Practice Flows and Loads document (2013) suggests water use can vary based on the types of hotel proposed with a range of water use between 80-300 litres per person per day. Natural England advise that a more precautionary bespoke water use calculation would be appropriate for proposed hotels.

A3.211 The following main issues were raised by general and other consultation bodies on Policy PLP44: Nutrient Neutrality in International Nature Designations:

- **New Forest DC** support the inclusion of the policy, which sets out to ensure that development proposals demonstrate through a nutrient budget that they secure nutrient neutrality to avoid having a detrimental impact on the recognised features of the internationally important habitats.
- **HIWWT** welcome and strongly support the inclusion of the policy. They strongly welcome the emphasis on local delivery mechanisms and mitigation, as well as ensuring appropriate mitigation is secured through legal agreements and delivered prior to first occupation. They recommend that the policy goes further and integrates a stronger preference for nitrate mitigation schemes that will deliver wider environmental benefits, especially for biodiversity. The "stacking" of nutrient and Biodiversity Net Gain benefits offers a valuable route to deliver this. The opportunities for the creation and improvement of habitats, as part of mitigation proposals, should be as identified through the Government's forthcoming Nature Recovery Network and the Local Nature Recovery Strategy.

- **HIWWT** highlight that water quality remains a significant issue of concern locally. This problem is likely to significantly worsen due to climate change, with rising sea levels and extreme weather, having detrimental impacts on the health and well- being of Portsmouth residents. They state that this is indicative of the current state of play with our water and drainage infrastructure that frequently fails and which is unable to meet existing requirements or adhere to licensed conditions. Given the current lack of confidence in effective and timely investment in our critical water infrastructure, this plan must ensure that it does not add further to the acute pressures faced by the City's water environment.
- **Southampton City Council** support the policy and commits to working with PCC on the coordination of new mitigation schemes alongside other local authority members in the Partnership for South Hampshire.

Strategic Policy PLP44: Nutrient Neutrality in International Nature Designations - Council response

How the representations have been taken into account:

- The Council has proposed to add a new paragraph in the Schedule of Changes to the Pre-Submission Local Plan to address comments from Natural England and Southern Water. A statement of common ground has been prepared with Southern Water (dated September 2024) to address the issues they have raised.
- The Council's Nutrient Budget which forms part of the Habitats Regulations Assessment has been updated to reflect the comments from Natural England re hotels and HMOs. The budget also addresses comments by New Forest District Council.
- The Council has not added the detail requested by HIWWT as this would repeat national policy.
- The HIWWT has commented on the potential of nutrient mitigation stacking; this is something that the Council is looking at on mitigation sites in its work with PfSH and the Solent Mitigation Partnership. This will be looked at on a case-by-case basis by mitigation site, as not all sites are suitable for stacking. The Nutrient budget prepared by the Council demonstrates sufficient mitigation to ensure that the plan does not add further to the acute pressures faced by the City's water environment.
- A statement of common ground has been prepared jointly with RSPB and HIWWT (dated February 2025) to address the issues they have raised.
- PCC welcomes SCC's comment and will work alongside Southampton in delivering mitigation as part of the wider PfSH and Solent Mitigation Partnership work.

Development Management Policy PLP45: Open Space

	Number of respondents
Total number of respondents	4
Respondents who raised soundness	1
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.212 Whilst most respondents are supportive of the policy, a few issues have been raised in response to the consultation. Southern Water points out that water and wastewater infrastructure may have to be placed in very specific places which may have to be an exception or further caveat. Both Milton Neighbourhood Forum and Air Quality colleagues from PCC raise an issue around the 50 dwelling threshold as it allows a loophole whereby developers may choose to build 49 dwellings instead or deliver the site in smaller blocks to avoid the open space requirement. PCC also notes that there is insufficient monitoring to look out for such behaviours.

A3.213 The following main issues were raised by specific consultation bodies on Policy PLP45: Open Space.

- **Southern Water** highlight that it is important to ensure policy does not create a barrier to statutory utility providers from delivering essential infrastructure. They recommend adding a new criterion to section 2 of the policy:
  'e) The development relates to essential infrastructure, such as water and wastewater infrastructure.'

A3.214 The following main issues were raised by general and other consultation bodies on Policy PLP45: Open Space:

- **Milton Neighbourhood Forum** indicate that the proposed increase in open space provision from 15m^2/1,000 people on sites of 50 dwellings or more to 16.5m^2/1,000 is welcome but there remains a threat to Open Space loss (and loss in size of Nature Reserves) on the grounds of wider public benefits outweighing harm. If open space can be lost to "wider public benefits" then the 50 dwelling criteria should be halved to 25, otherwise there will be an incentive to build smaller developments of up to 49 units with no compensatory Open Space provision in neighbourhoods. These neighbourhoods will face an increasing demand on the residue of open spaces within them, whilst elsewhere there is potential for loss so that the City becomes ever more bereft of what little open space it currently has and public health suffers.
- **Sport England** state that 2(d), where 'there are wider public benefits which outweigh the harm of the loss' should be removed. This will ensure consistency with paragraph 103 of the NPPF.
- **Sport England** comment on Para 9.113 and welcome clarification within the SOCG as this para relates to PCC 2018 Playing Field Strategy to guide development of new play and recreational provision. They raise this strategy as being 6 years old and considered out of date. SE strongly encourage that PCC undertake work to delivery a new Playing Field strategy in accordance with SE guidance and as per para 102 of the NPPF.
- **PCC Public Health** raise concerns that the open space policy is not deliverable in its current form in terms of the open space provision calculation for developments. Recognising point a) - there needs to be more substantial wording as the policy is likely to be not deliverable on site - they ask if there can therefore be stronger wording so that PCC can optimise developer contributions for strategic open space site improvements.

- **PCC Public Health** further comment that on monitoring plans for strategic sites and they do not include the opportunity to monitor policies, for example there is nowhere to see both how much open space should be being provided as part of a development, and whether that was delivered. It may be that the assumption is that the open space for Tipner East is at Horsea Island.

Development Management Policy PLP45: Open Space - Council response

How the representations have been taken into account:

- No amendments have been made in response to the Southern Water response as the Council considers that criterion 2.d) of the policy allows for the type of development they describe where the benefits it delivers outweigh the loss. A statement of common ground has been prepared with Southern Water (sated September 2024) to address the issues they have raised.
- The Council does not have the evidence to support an altered threshold for open space as requested by the Milton Neighbourhood Forum. A statement of common ground has been prepared with Milton Neighbourhood Forum (dated August 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Sport England (dated February 2025) to address the issues they have raised.
- Changes are proposed to criterion 3 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to comments from PCC Public Health.
- In response from the comment from PCC Public Health, the Council recognises that not all sites will be able to accommodate the requirement onsite, it is for this reason that point 3 of the policy allows for offsite enhancement, therefore, no change is proposed.
- A statement of common ground has been prepared with PCC Public Health (dated February 2025) to address the issues they have raised.

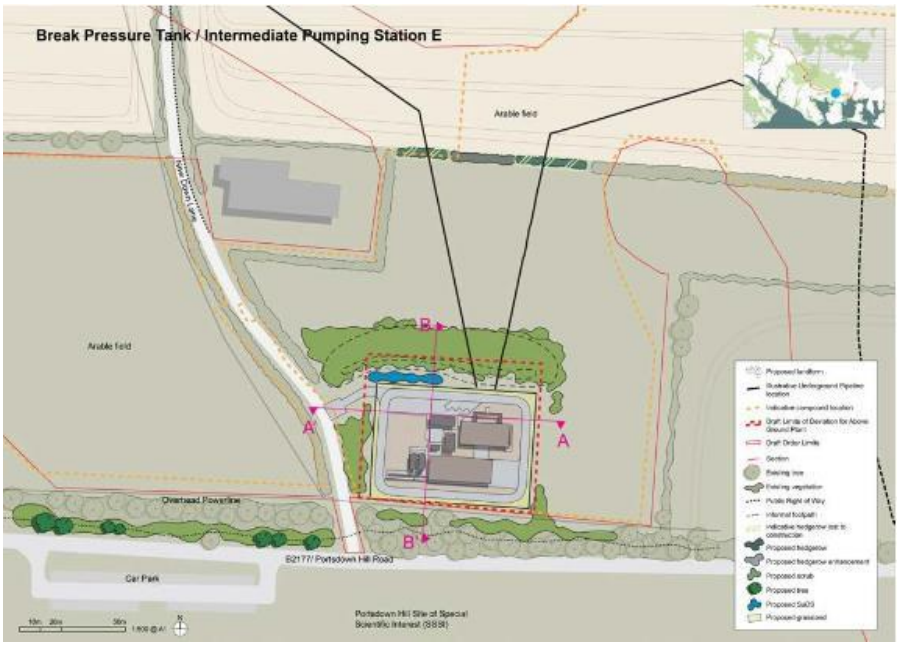
Development Management Policy PLP46: Local Green Spaces

	Number of respondents
Total number of respondents	4
Respondents who raised soundness	2
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.215 Fareham Borough Council are supportive of Portsdown Hill being included as a designated Local Green Space. Historic England highlight the importance of recognising explicitly in the text some of the Local Green Spaces are also designated for their heritage significance. The natural environment and historic environment are integral to each other. This provides an opportunity to cross-refer to the heritage section of the plan.

A3.216 The following main issues were raised by specific consultation bodies on policy PLP46: Local Green Spaces:

- **Southern Water** consider Policy PLP46 to be unsound as changes are necessary to make the policy consistent with the NPPF (2023). They have requested an amendment to the proposed boundary for the 'Portsdown Hill' Local Green Space, to help facilitate Southern Water's 'Hampshire Water Transfer and Water Recycling Project.' They recommend that the site of a proposed Break Pressure Tank/Intermediate Pumping Station E (see map below) be excluded from the Local Green Space designation.



- **Southern Water** recommend that a new criterion be added to Policy PLP46 to ensure compliance with the requirements set out in paragraph 107, 152 and 155 of the NPPF (2023) to reflect Green Belt policy. They propose the following wording:
  'Inappropriate development within Local Green Space will not be approved except in very special circumstances. National policy sets out exceptional types of development that would not represent inappropriate development in relation to Green Belts. The same exceptions will be applied to designated Local Green Space.'
- **Southern Water** suggest that the policy should be expanded to include development management principles for proposals on Local Green Space which are consistent with Green Belt policy.
- **Historic England** highlight the importance of recognising in the text that some Local Green Spaces are also designated for their historic significance. They suggest cross-referencing the heritage section of the plan.
- **Fareham Borough Council** support Portsdown Hill being proposed as a Local Green Space, noting it is an important part of the landscape in South East Hampshire. It is also identified in the Fareham Local Plan 2037 as an 'Area of Special Landscape Quality.'

A3.217 The following main issues were raised by general and other consultation bodies on Policy PLP46: Local Green Spaces:

- One individual deems that Policy PLP46 is not sound, not legally compliant and does not comply with the Duty to Cooperate. It is worth noting that their comments also relate to Policy PLP45: Open Space. They recommend that 'St John's Playing Fields' (also referred to as 'Thirty Two Acres') be removed from Policy PLP45: Open Space and also Policy PLP46: Local Green Space, and that the site is also removed from

Figure 9.1. The reasons given are summarised as follows: the site is privately-owned, has always been locked and gated, and is not open for use by the local community; it does not contribute towards the Council's playing-pitch provision; it is designated as Open Space in The Portsmouth Plan (2012) (Map 21), but its type was never defined nor assessed in the Green infrastructure Background Paper (2021); the site was part of the Parks and Open Spaces Strategy 2012-2022 but has not been carried forwarded in the updated strategy for 2022-2038; it is demonstrably not special to the local community. It is suggested that the site is mistakenly included in the same description as Farlington Playing Fields and the Farlington Triangle in Appendix 1 of the Local Greenspaces Background Paper (2024) which describes the sites collectively as having informal paths/trails which are popular amongst dog walkers.

Development Management Policy PLP46: Local Green Spaces - Council response

How the representations have been taken into account:

- In response to Southern Water's representation, a change has been proposed to the boundary for the Portsdown Hill Local Green Space in the Schedule of Changes to the Pre-Submission Local Pan 2024.
- In response to Southern Water's comments to include a new policy criterion to address compliance with the NPPF in terms of Green Belt, no change has been proposed. Criterion 1 of Policy PLP46 from the Pre-Submission Local Plan 2024 acknowledges the requirement to be 'in line with the NPPF or its future equivalent.'
- A statement of common ground has been prepared with Southern Water (dated September 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- The Council decided not to remove 'St John's Playing Fields' (also referred to as Thirty Two Acres) from the proposed Farlington Playing Field, St John's College Playing Fields and Farlington Local Green Space designation. The rationale for this decision can be found in Appendix 1 of the Local Green Spaces Background Paper.

Chapter 10: Infrastructure

	Number of respondents
Total number of respondents	7
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.218 There is some criticism of this section. LTP4 is seen as wildly optimistic by Milton Neighbourhood Forum, and travel plans to date have not made a difference to levels of car dependency. Another respondent makes the point that jobs need to be accessible by public transport. Various NHS bodies point out that developers must contribute to the cost of providing additional healthcare infrastructure in their plans, and that existing primary care facilities (GPs) will not be able to meet the demand from new developments as they are already at saturation point.

A3.219 The following main issues were raised by specific consultation bodies on Chapter 10: Infrastructure:

- **Historic England** state that there should be reference to cultural infrastructure in paragraph 10.2 which should reference the City's heritage assets.
- **Southern Water** suggest amendment to paragraph 10.2 on grey infrastructure to include water and wastewater treatment works.
- The **NHS Hampshire and Isle of Wight ICB** state that paragraph 10.3 fails to highlight chronic shortage of primary care capacity across the City. They note that Portsmouth is one of a few local authorities in which all its GP practices have more patients than the physical infrastructure can accommodate. They note that the Plan directs developments to areas where there is availability of public service infrastructure. They highlight concern that whilst there are potentially GP practices within the location of the proposed developments there is no infrastructure capacity to accommodate the population growth. They state that increase to primary care infrastructure cannot be delayed and subject to CIL fund bidding, there must be pooling of S106 contributions. They note the ICB has submitted draft Infrastructure Delivery Plan comments and is committed to keeping these up to date.

A3.220 The following main issues were raised by general and other consultation bodies on Chapter 10: Infrastructure:

- **Milton Neighbourhood Forum (MNF)** note the aims of the 2001 – 2011 Local Plan and the objective of the Portsmouth Plan 2012. MNF state that Transport Plans and strategies have made no noticeable difference to miles travelled within Portsmouth by cars and taxis between 2000 and 2023. MNF state that the downward trend in journeys is because of the increased tendency/preference of working from home, rather than active transport interventions. MNF state that the Local Transport Plan 4 is too optimistic and that traffic levels will not be remedied through optimisation of traffic signalling. MNF state there is no evidence that Travel Plans in new developments make a sufficient difference to levels of car-dependency.
- **NHS Property Services** state that new development should make a proportionate contribution to funding healthcare needs arising from new development. They note that health provision is an integral component of sustainable development to promote good health outcomes and support economic and social wellbeing. They note that residential development often has significant impacts on need for additional primary healthcare

provision for future residents and should be an infrastructure delivery priority. They note that policies should enable delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to deliver estate transformation.

- **Langstone Harbour Board** note that the Portsmouth Transport Strategy 2021 references co-ordination of public transport routes working with bus and ferry operators. They note the Local Cycling and Walking Infrastructure Plan identifies Hayling ferry as an opportunity area with the creation of a fully segregated cycle route from Hayling ferry to Clarence Pier.
- A respondent states that jobs need to be accessible by public transport to reduce commuting by car within South Hampshire.

Chapter 10: Infrastructure - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- A change is proposed to paragraph 10.2 in the Schedule of Changes to the Pre-Submission Local Plan 2024 to include water and wastewater treatment works in response to the comment from Southern Water. A statement of common ground has also been prepared with Southern Water (dated September 2024) to address the issues they have raised.
- A change is proposed to paragraph 10.3 in the Schedule of Changes to the Pre-Submission Local Plan 2024 to recognise the shortage of primary care capacity across the City, in response to the comment from NHS Hampshire and Isle of Wight ICB.
- The Infrastructure Delivery Plan provides evidence on infrastructure which justifies the approach taken on infrastructure in the Local Plan.
- Some respondents made general comments which do not require changes to the introduction to Chapter 10: Infrastructure.

Strategic Policy PLP47: Movement and Transport

	Number of respondents
Total number of respondents	8
Respondents who raised soundness	3
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	2

A3.221 Respondents are supportive of the policy and make a few recommendations for additional or slightly tweaked text.

A3.222 Network Rail would like reference to be made to the importance of early engagement relating to station capacity and any required improvements.

A3.223 The Local Highways Authority would like some additional cross-referencing to the Manual For Streets, DfT/Active Travel England and the LTP4.

A3.224 Portsmouth Cycle Forum would like the text to be strengthened in various places.

A3.225 Both Portsmouth Cycle Forum and Hampshire County Council would like the travel plans of neighbouring local authorities to be referenced.

A3.226 The following main issues were raised by specific consultation bodies on Policy PLP47: Movement and Transport:

- **Hampshire County Council** support the policy, although recommend a minor amendment to reference the Local Cycle Walking and Infrastructure Plans adopted by the County Council and neighbouring authorities to ensure cross boundary pedestrian and cycle connections.
- **National Highways** support this policy, in particular, the people-centred approach, links to the LCWIP, and reference to any significant impact on the strategic road network needing to be mitigated fully.
- **Network Rail** support the policy and state that development should be encouraged close to public transport hubs. They propose amended wording at paragraph 10.29 to reference early engagement with Network Rail regarding capacity at stations and any improvements: 'arising from the development itself and/or the cumulative effects of development, through the provision of, or contributions towards, necessary and relevant transport improvements including capacity and junction improvements, railway and station improvements and air pollution reduction measures.'
  'Early engagement with the local highway authority, National Highways and Network Rail is required.'
- **PCC LHA** support Policy PLP47. They propose some minor additions:
  Paragraph 7: inclusion of a reference to Manual For Streets (see our prior comment relating to Policy PLP1 regarding reference to this national guidance);
  Supporting text Para 10.23: Addition of a sentence stating that walking and cycling infrastructure for /within new developments should follow design standards set out in guidance published by DfT/ Active Travel England, in particular that set out in Local Transport Note 1/20, Manual for streets and Portsmouth Transport Strategy (LTP4).

A3.227 The following main issues were raised by general and other consultation bodies on Policy PLP47: Movement and Transport:

- **Friends of Old Portsmouth Association (FOOPA)** state that the policy favours cyclists over pedestrians and that sharing pathways can be dangerous for pedestrians. They would like enforcement action to stop cycle/scooter users on the pavements. FOOPA also raise the point that school journeys are not mentioned. These should not be by car and are candidates for walking. Car use could be further mitigated through bus subsidies for school children. FOOPA also state that integrated public transport schemes should be providing links to key amenities.
- **Southampton City Council (SCC)** consider Policy PLP47 not to be sound. Their representation reiterates the need for coherent and reliable public transport connections between Portsmouth and Southampton that offer a viable alternative to the car.
- **SCC** state that the policy should be modified to include a statement on working with neighbouring Local Authorities to develop and deliver strategic transport improvements as detailed in the emerging Solent Transport Prospectus as well as with partners in the wider south-east as set out in the Transport for the South East (TfSE) Strategic Investment Plan. SCC provide examples within their representation including the creation of a Mass Transit System.

- **Premier Marinas** broadly support the thrust of Policy PLP47 which seeks to minimise the need to travel and maximise opportunities for sustainable transport modes. They however consider it unsound and state that the supporting text to this policy should also make reference to paragraph 115 of the NPPF which is explicit that: 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' This will ensure Policy PLP47 is more consistent with national policy in accordance with paragraph 35(d) of the NPPF.
- **Portsmouth Cycle Forum (PCF)** strongly support this policy, although provide some minor modifications. They state that it could be beneficial to add more detail about Transport Assessment requirements into point 5 to align with the proposed changes to National Planning Policy Framework including a vision led approach. Criterion 6 could explicitly referred to highway safety for all users. Within the supporting text, 10.25 could be improved by defining 'efficient operation.' 10.29 could bolster this point by adding that mitigation which would have detrimental impacts on walking, cycling and wheeling would not be supported. 10.29 could also reference consideration of networks in neighbouring authorities and the need to engage with those Local Planning Authorities, and Hampshire County Council, particularly in relation the LCWIPs.
- **PCF** propose changing 10.18 which currently suggests 'growth in private vehicle use is kept to a minimum' to reflect that is needs to reduce, and shift towards public transport, walking and cycling. 10.28 could align more closely with the proposed NPPF changes around vision led transport assessments.
- **PCF** state that monitoring measures included in the Reg 18 consultation are not present.

Strategic Policy PLP47: Movement and Transport - Council response

How the representations have been taken into account:

- In response to comments made by Hampshire County Council, amendments have been proposed to para 10.22 in the Schedule of Changes to the Pre-Submission Local Plan 2024 to ensure cross boundary pedestrian and cycle connections, and reference to the LCWIP.
- A statement of common ground has been prepared with National Highways (dated February 2025) to address the issues they have raised.
- Amendments have been proposed to Policy PLP6 in the Schedule of Changes to the Pre-Submission Local Plan 2024 (rather than to policy PLP47) to address the issue raised by Network Rail regarding capacity at Portsmouth and Southsea Station. The overall Development Strategy of the Local Plan directs development to more accessible locations as evidenced by the City Centre Strategic Site and residential density policy (PLP21). A statement of common ground has been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- In response to comments from PCC LHA, the Council has proposed amendments to para 10.23 in the Schedule of Changes to the Pre-Submission Local Plan 2024 re Manual for Streets and Active Travel England. A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- The comments by FOOPA on restricting certain types of vehicle use and types of journey, for example scooters, are beyond the scope of the Local Plan.

- The Council has proposed a new paragraph after para 10.16 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to Southampton City Council's comments to include a statement on working together with neighbouring Local Authorities.
- No change has been made in response to Premier Marina's comment as this is already addressed by paragraph 10.28 which references the NPPF and severity.
- In response to comments made by Portsmouth Cycle Forum, the Council has proposed amendments to para 10.18 in the Schedule of Changes to the Pre-Submission Local Plan 2024.

Development Management Policy PLP48: Access and Parking

	Number of respondents
Total number of respondents	4
Respondents who raised soundness	2
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.228 Respondents are supportive of the policy and request some modifications. PCC LHA would like the policy to state that EV infrastructure provision at new developments should meet or ideally exceed current standards set out in relevant legislation. Historic England would like to add a new paragraph linking the importance of heritage assets to local wellbeing.

A3.229 Portsmouth Cycle Forum think point 4 could be improved by explicitly referencing the need for accessible cycle parking for users of adapted cycles and cargo bikes. They also comment on monitoring measures missing from the plan (which did appear in the Local Plan Regulation 18).

A3.230 The following main issues were raised by specific consultation bodies on Policy PLP48: Access and Parking:

- **PCC LHA** support the policy, but suggest amendment to policy criterion 3 to state that Electric Vehicle Infrastructure provision in new developments must as a minimum meet, and ideally exceed the current standards set out in building regulations and other relevant national policies/ standards. They note that the Government adopted a new Building Regulations in 2022 which sets out the current standards.

A3.231 The following main issues were raised by general and other consultation bodies on Policy PLP48: Access and Parking:

- The **HBF** do not consider the policy sound and state that it is inconsistent with national policy. The reason for this is that the Council should not require development to accord with an SPD as the Council cannot set policy standards outside of the Local Plan itself. They suggest amendment for the standards to be included within the Plan or that development should have regard to parking standards within an SPD.
- **Friends of Old Portsmouth Association** state that policies PLP48, PLP50, and PLP51 do not mention payment methods for public parking. They state that the ability to park should not be restricted to individuals owning a smartphone with the appropriate parking app and emphasise the importance of supporting cash and card payments in all

locations to avoid discrimination and limiting of travel options. They note this is dependent on appropriate mobile telecoms network availability in Portsmouth.

- **Portsmouth Cycle Form** support the policy and would welcome the opportunity to engage with the proposed Parking and Transport Assessment SPD update. They suggest amendment to policy criterion 4 to explicitly reference the need for accessible cycle parking for users of adapted cycles and cargo bikes. They note monitoring measures included in the Reg 18 consultation are not present. They suggest the policy could specify how monitoring will be undertaken.

Development Management Policy PLP48: Access and Parking - Council response

How the representations have been taken into account:

- The Council does not have evidence to support the request by PCC LHA to exceed National Standards in respect of electric vehicle infrastructure. A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- The Council has proposed several amendments to PLP48 criteria 2, 3 and 4 and to para 10.38 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to the HBF representation.
- The comments from FOOPA have not been addressed as they are beyond the scope of the Local Plan.
- Proposed amendments from the PCF have been proposed in the Schedule of Changes to the Pre-Submission Local Plan 2024 adding adapted cycles and cargo bikes to criterion 4.

Development Management Policy PLP49: Public Realm

	Number of respondents
Total number of respondents	4
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.232 PCC LHA think Manual for Streets should be added to Policy PLP49 and/or the supporting text. Design standards for cycle infrastructure set out in Local Transport Note 1/20 should also be identified as a consideration for any public realm schemes which propose to deliver cycle infrastructure in this policy.

A3.233 The following main issues were raised by specific consultation bodies on Policy PLP49: Public Realm:

- **Historic England** state that Policy PLP49 currently misses acknowledgement of the contribution made by the historic environment to the public realm. This could be made explicit in perhaps an expanded paragraph 10.48. Encourages reference to Historic England's 'Streets for All' guidance.
- **PCC LHA** support the policy, in particular criteria 1(e) and 1(f). They note the Department for Transport Manual for Streets which sets out design guidance including

considerations for public realm as the basis of residential street design. They suggest amendment to add reference to the Manual for Streets to the policy or its supporting text. They also suggest amendment for design standards for cycle infrastructure set out in Local Transport Note 1/20 to be identified as a consideration for any public realm schemes which propose to deliver cycle infrastructure in this policy.

A3.234 The following main issues were raised by general and other consultation bodies on Policy PLP49: Public Realm:

- **PCC Public Health** state that there appears to be no reference to the Healthy Streets[7] approach to assessing planned development and transport and highways infrastructure. They suggest that within the supporting text around PLP49: Public Realm that development proposals are asked to consider the 10 Healthy Streets indicators as a means of improving health and wellbeing and the human experience of the public realm.

Development Management Policy PLP49: Public Realm - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- The Council has proposed amendments to paragraph 10.50 in the Schedule of Changes to the Pre-Submission Local Plan 2024 in response to comments from PCC LHA and PCC Public Health. Statements of common ground have been prepared with both PCC LHA (dated November 2024) and PCC Public Health (dated February 2025) to address the issues they have raised.

Development Management Policy PLP50: Infrastructure Delivery

	Number of respondents
Total number of respondents	5
Respondents who raised soundness	1
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.235 Respondents are supportive but would like more detail on how developer contributions will be obtained and a more cohesive process around assessment of healthcare requirements of a new development and how they will be delivered, whether that is through adaptation of existing provision, or new buildings and infrastructure.

A3.236 The following main issues were raised by specific consultation bodies on Policy PLP50: Infrastructure Delivery:

- **Network Rail** support the policy for securing funding and provision of infrastructure to support development, and the use of S106 to secure infrastructure and allow phasing to be limited to ensure delivery of infrastructure as required. They note that they will continue to work with Council to update the Infrastructure Delivery Plan.
- **NHS Hampshire and Isle of Wight ICB** support the policy and paragraph 10.62 of the supporting text that new development should be adequately supported by existing

infrastructure or make sufficient provision for new infrastructure required to make the development acceptable in planning terms. They note the impacts from new housing developments need to be supported by direct developer contributions through s106 and not rely on CIL. They also support paragraph 10.63 of the supporting text stating the inclusion of the policy that developer contributions, secured by planning obligations such as s106 agreements and collected via CIL, can be used to deliver infrastructure.

- **Historic England** state that 'cultural infrastructure' should include all heritage assets within Portsmouth (in accordance with the NPPF). They state that it would be reasonable to expect the Council's approach to aim at least to maintain existing levels of cultural assets that exist within the district, and to seek improvements to secure the long term future of assets classed as 'at risk'. They propose including 'heritage at risk' as a final bullet point to paragraph 10.67.

A3.237 The following main issues were raised by general and other consultation bodies on Policy PLP50: Infrastructure Delivery:

- **NHS Property Services** support the inclusion and recognition of health as priority infrastructure in the Plan. They note expectation that development proposals will make provision to meet cost of healthcare infrastructure made necessary by the development. They state that appropriate funding must be consistently leveraged through developer contributions for health and care services in areas of significant housing growth. They state that the significant cumulative impact of smaller housing growth and need for mitigation must be considered.
- **NHS Property Services** emphasise the importance of effective implementation mechanisms so healthcare infrastructure is delivered alongside new development, in particular primary healthcare services.
- **NHS Property Services** state that the policy does not sufficiently reflect the process which must be undertaken to determine appropriate form of developer contributions to health infrastructure. They suggest that the Plan should emphasise that the NHS and its partners will need to work with Council in the formulation of appropriate mitigation measures. Requested the Council engage with the Integrated Care Board to add further detail to the Plan and the Infrastructure Delivery Plan on the process for determining appropriate form of contribution towards provision of healthcare infrastructure where justified. The reason for this is to ensure a robust assessment of existing healthcare infrastructure and mitigation options are secured to align with NHS requirements. Outlined a suggested process within their response.
- **Premier Marinas** broadly support the policy. However, they state it is unsound and note that it is critical that the requirements for and/or financial contributions towards new infrastructure delivery are proportionate to the scale of proposed development and factor in financial viability of the development and any abnormal costs. The reason for this is to ensure the policy is more consistent with national policy.

Development Management Policy PLP50: Infrastructure Delivery - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with Network Rail (dated November 2024) to address the issues they have raised.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- In response to the NHS Property Services' representation on mitigation, no changes are proposed as the Council believes this is covered in paragraph 10.61 of the introduction to the policy. The Council continues to engage with the NHS Hampshire & Isle of Wight ICB on the IDP.
- In response to Premier Marinas's request for additional wording regarding financial contributions towards new infrastructure, the Council believes that the wording in policy criterion 1.a) already covers this and so no change has been proposed.
- Some respondents made general comments which do not require changes to the introduction to PLP50: Infrastructure Delivery.

Development Management Policy PLP51: Electronic Communication and Utilities Infrastructure

	Number of respondents
Total number of respondents	1
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.238 The following main issues were raised by specific consultation bodies on Policy PLP51: Electronic Communication and Utilities Infrastructure:

- **Southern Water** flag that additional water or wastewater infrastructure may be needed to serve new and existing residents or to meet stricter environmental standards. As such, they recommend that the following wording is included within the policy PLP51: 'New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan. Upgrades to existing water and/or wastewater infrastructure may be required to ensure that there is adequate capacity available to accommodate new development. Occupation of the development may need to be phased to align with the delivery of these upgrades, this to ensure that adequate capacity is available to accommodate the number of dwellings. This phasing would be done in liaison with the service provider.'

A3.239 No responses were received from general or other consultation bodies on Policy PLP51: Electronic Communication and Utilities Infrastructure.

Development Management Policy PLP51: Electronic Communication and Utilities Infrastructure - Council response

How the representations have been taken into account:

- No change is proposed in response to the comments made by Southern Water. The Council believes the requested wording is in conflict with criterion 1(a) of the policy. Paragraph 10.75 of the policy makes clear that PLP51 should be read in conjunction with PLP32: Sustainable Drainage Systems. A statement of common ground has been prepared with Southern Water (dated September 2024) to address the issues they have raised.

Development Management Policy PLP52: New & Existing Community & Leisure Facilities

	Number of respondents
Total number of respondents	2
Respondents who raised soundness	2
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.240 NHS Property Services would like more flexibility in the policy to allow them to dispose of existing healthcare sites if they are surplus to requirements and would like the requirement for them to be retained for community use to be removed.

A3.241 Sport England would like the wording changed to bring the policy more in line with NPPF and remove distinction between community-run or commercially-run premises.

A3.242 No responses were received from specific consultation bodies on Policy PLP52: New & Existing Community & Leisure Facilities.

A3.243 The following main issues were raised by general and other consultation bodies on Policy PLP52: New & Existing Community & Leisure Facilities:

- **Sport England** consider Policy PLP52 to be unsound. They state that the policy weakens the protections given to sports facilities in the NPPF because it distinguishes between community and commercially run facilities, and it includes lack of viability as one of the circumstances under which sports facilities can be lost. The policy wording should be amended to remove the distinction between commercially run or community run facilities and policy wording in 2.a) and 2.b) should remove any references to 'viability'.
- **Sport England** state that there should be reference to 'quantity' of provision in 2.c), i.e. with the insertion of 'and of an equivalent or greater quantity to those lost' to ensure greater consistency with para. 103 of the NPPF.
- **NHS Property Services** support the provision of sufficient, quality community facilities but do not consider the proposed policy approach to be positively prepared or effective in its current form. Policies which are aimed at preventing the loss or change of use of a community facility can have a harmful impact on the NHS's ability to ensure delivery of facilities and services for the community. The NHS require flexibility with regards to the

use of its estate and the disposal of redundant sites is critical to help fund new and improved services. If the NHS are required to explore potential alternative community uses and/or retain a substantial proportion of community facility provision, this adds unjustified delays to reinvestment. To ensure the Plan is positively prepared and effective the following addition is sought by NHS Property Services to para. 2: (d) 'Where the existing facility is a healthcare facility that has been formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estate strategy or service transformation plan, the requirements listed under 2(a) to 2(c) of the Policy will not apply.'

Development Management Policy PLP52: New & Existing Community & Leisure Facilities - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with Sport England (dated February 2025) to address the issues they have raised.
- The Council has not proposed any amendments in response to issues raised by NHS Property Services. Given the current shortage of healthcare space, the Council does not wish for healthcare facilities to be easily converted to other uses.

Chapter 11: Heritage

	Number of respondents
Total number of respondents	1
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A2.244 Historic England welcome the preparation of a Heritage Strategy and consider it vital for said strategy to connect effectively with the Local Plan. They would like more added on the Heritage Strategy in this chapter, particularly around the historic environment and heritage at risk.

A2.245 The following main issues were raised by specific consultation bodies on Chapter 11: Heritage:

- **Historic England** state that the preparation of a Heritage Strategy would be welcomed, and such strategy should connect with the Local Plan. They request that Table 11.1 be amended to refer to 'heritage assets' rather than 'historic assets,' to align with NPPF's terminology.
- **Historic England** request that greater reference to the Heritage Strategy should be included throughout Chapter 11, specifically in regards to the historic environment, especially on heritage at risk.
- **Historic England** suggest an amendment to include a new paragraph before paragraph 11.6 that flags the connection between the strategic Historic Environment policy PLP53 and the objective of being a healthy and happy City. The reason for this is that the City's heritage is part of what contributes to local wellbeing.

A2.246 No responses were received from general or other consultation bodies on Chapter 11: Heritage in general.

Chapter 11: Heritage - Council response

How the representations have been taken into account:

- In response to comments from Historic England, the Council has proposed a change to table 11.1 in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has also been prepared with Historic England (dated 2025) to address the issues they have raised.

Strategic Policy PLP53: Historic Environment

	Number of respondents
Total number of respondents	3
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.247 The Portsmouth Society support the policy but raise various points including wording changes, more emphasis on architectural and historic heritage in the plan, a re-instatement of the Design Review Panel, a query on how MoD historic assets will be protected, and how non-designated heritage assets will be defined (they suggest completing List of Buildings of Local Significance using expertise of various local organisations).

A3.248 Both the Portsmouth Society and Historic England also query whether more could be done to protect historic buildings using appropriate building materials that complement the existing environment. Historic England also suggests referencing the Heritage Strategy in this section.

A3.249 The following main issues were raised by specific consultation bodies on Policy PLP53: Historic Environment:

- **Historic England** comment that at risk assets include more than just the assets identified by Historic England. As acknowledged in the Council's emerging Heritage Strategy, they encourage local authorities to produce their own at-risk registers, to support the identification of assets for regeneration and enhancement. They note that the Council's Strategy states: 'This is an area that may need to be taken forward to support prioritisation, particularly in the context of constrained resources.' They flag that this provides a good opportunity to reference the Heritage Strategy, which is otherwise not mentioned in this section of the Local Plan. They consider this to be a surprising and disappointing omission, suggesting that the two should be firmly connected.
- **Historic England** strongly recommend adding more detail here on heritage at risk and introducing the Heritage Strategy with the plan's chapter on the historic environment.
- **Historic England** note a typo in paragraph 11.25: 't is incorrect'
- **Historic England** suggest edits to paragraph 11.26, to reinforce the need for heritage expertise to inform the decisions made and refer to harm rather than impacts (the latter could be positive).

A3.250 The following main issues were raised by general and other consultation bodies on Policy PLP53: Historic Environment:

- **The Portsmouth Society** comment on the lack of focus in the Plan on the Local List (multiple sections within the plan). They note that according to 'Conservation & Built Heritage July 2021', Homes England guidance note 7 asserts that 'Where a local list exists, it is good practice to have a relevant policy in the Local Plan which explains how assets on the list will be dealt with.' They go on to explain that it is intended that the revised conservation and design policy currently under consideration for the new Local Plan, address development relating not only to designated, but also explicitly to un-designated heritage assets. Therefore, an individual policy that focuses exclusively on development impacts and locally listed assets would essentially replicate the content and approach of this more widely framed policy solution and is therefore considered unnecessary. Then, when you look at section 11.23 of Reg 19 it reads, '(The Local List) is a 'non designated heritage asset'. Where a building or structure is not included on the Local List the Authority may nevertheless still judge (at its discretion) that it has the status of a non-designated asset for the purposes of decision making. The City's HER will be consulted as part of the process to identify any non-designated assets not included on the Local List.'
- **The Portsmouth Society** commented regarding Conservation & Built Heritage July 2021, having regard to current experience and practice, (which has shown this to be an area of very limited stakeholder interest), and the competing demands of other objectives

identified in this paper, a continuation of the status quo is not considered untenable. Such an approach is not however indicative of best practice, and in the longer term (3-5 years) would realistically require attention.

- **The Portsmouth Society** argue that limited stakeholder interest is a result of the total lack of regard for the Local List within the Council and the failure to maintain or update it in anyway over the past 23 years (a draft local list was approved by the Council 22.06.01 and adopted 21.03.03. It was updated (without addition) December 2011).
- **The Portsmouth Society** suggest an amendment to PLP 53 Historic Environment. They note that the supporting text at 11.12 includes the statement: 'or any other method agreed by the applicant and the LPA.' This seems unnecessarily lax and they recommend its removal.
- **The Portsmouth Society** point to 11.4 where there is mention of the development of Southsea under architect Thomas Ellis Owen, but the prior contribution of Thomas Croxton has not been mentioned, although he developed the beginning of Southsea, known as Croxton Town, at the start of the C19.
- **The Portsmouth Society** comment on 11.6 which acknowledges here 'the desirability of new development making a positive contribution to Portsmouth's character and distinctiveness.' They ask how this will be implemented and monitored. They suggest that the reinstatement of a Design Review Panel would assist in assessing the design quality of development.
- **The Portsmouth Society** flag that at 11.8 Portsmouth has many entries on Historic England's Buildings at Risk Register, particularly Ministry of Defence buildings. They ask how the City Council is ensuring that their deterioration is arrested, they are restored, adapted, retrofitted and reused for new sustainable purposes. Enabling development and integration of threatened assets into new developments is not always possible, especially in active MOD sites such as HM Naval Base. They note 4 and 5 of Strategic Policy PLP53 and 11.18.
- **The Portsmouth Society** comment on paras 11.13, and 11.14, saying that the Heritage Statement is supplied by the applicant and where there are competing narratives these should be objectively assessed.
- **The Portsmouth Society** state that the City's Heritage assets are enhanced with the passing of time and by an increased understanding of significance. Given the losses noted at 11.5 the Society consider that the City should be particularly attuned to non-designated heritage assets. A dynamic Council list should respect changing perceptions of heritage.
- **The Portsmouth Society** comment on 11.22 and state that how non-designated heritage assets are defined needs to be spelt out in detail. This task might be productively achieved by urgent revision of the list of Buildings of Local significance to which the Society, the Sustainable Conservation Trust, local history and resident's groups could offer their local knowledge and support.
- **The Portsmouth Society** comment on para 11.25, saying that it is incorrect to assume that older buildings will inevitably be less energy-efficient than modern ones. The retention of original/historic materials and features is frequently more cost-effective in energy terms than their modern equivalents and works to improve energy can generate adverse/harmful impacts to the fabric/setting of the assets. This is essential; they ask if there is any way of preventing unenlightened builders from, for example, using modern rendering materials, as opposed to lime mortar, in properties with solid walls, to ensure an equilibrium of moisture. Whilst nationally and locally designated buildings may be under more strict control, other historic buildings do not have this protection. They ask if training in the correct processes and materials to be used in historic buildings should be

mandatory in the local building trade. The City's conservation planners have an important advisory role here. Also in this section, embedded carbon statements look good but as elsewhere it relies on who is doing the weighing.

- **The Portsmouth Society** comment that at risk assets include more than just the assets identified by Historic England. As acknowledged in the Council's emerging Heritage Strategy, they encourage local authorities to produce their own at-risk registers, to support the identification of assets for regeneration and enhancement. The Council's Strategy states: 'This is an area that may need to be taken forward to support prioritisation, particularly in the context of constrained resources.' They flag this provides a good opportunity to reference the Heritage Strategy, which is otherwise not mentioned in this section of the local plan, a surprising and disappointing omission. The two should be firmly connected.
- **The Portsmouth Society** strongly recommend adding more detail on heritage at risk and introducing the Heritage Strategy with the plan's chapter on the historic environment. **The Portsmouth Society** suggest that where a proposal related to the improvement of an asset's energy efficiency is considered necessary, and would require Planning Permission and/ or Listed Building Consent, technologies/ solutions that minimise and or mitigate any potential harm impacts should be prioritised. Typically, this requires heritage expertise to inform the decisions taken.
- **The Portsmouth Society** comment that major historic buildings such as the Old Naval Academy, No.6 Dock and others on Historic England's Buildings at Risk register continue to deteriorate. They assert that they need assurance that the city planners are working closely with their owners including the MOD to ensure that they are returned to good repair, and that sustainable new uses are found for them.
- One individual commented that major historic buildings such as the Old Naval Academy, No.6 Dock and others on Historic England's Buildings at Risk Register continue to deteriorate. They need assurance that the city planners are working closely with their owners including the MOD to ensure that they are returned to good repair, and that sustainable new uses are found for them.

Strategic Policy PLP53: Historic Environment - Council response

How the representations have been taken into account:

- In response to comments made by Historic England, the Council has proposed amendments to paras 11.25 and 11.26 in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has also been prepared with Historic England (dated 2025) to address the issues they have raised.
- In response to the comments made by The Portsmouth Society, the Council does not consider it necessary to make changes to paragraph 11.12 as the method of assessing impact on setting is not prescribed by legislation or policy. It is, therefore, not possible to prevent consideration or use of other methods. Furthermore, it is not deemed necessary to add a policy that focuses solely on development impacts and locally listed assets because such matters are already sufficiently covered under Policy PLP53. Other comments made by The Portsmouth Society are either general statements and/or matters that can be addressed outside of the Local Plan process, including the reinstatement of a Design Review Panel, revision of the Council's 'Buildings of Local Significance' List. Changes suggested by The Portsmouth Society to Policy PLP53 are not deemed appropriate.

Development Management Policy PLP54: Listed Buildings

	Number of respondents
Total number of respondents	3
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.251 Historic England comment that the wording in criterion 1a) may limit delivery by focusing solely on the avoidance of loss rather than encouraging enhancement of the listed building. They also raise the absence of a conservation area appraisal for Conservation Area number 22: HM Naval Base and St George's Square as a concern.

A3.252 One respondent commented on the Local List of un-designated heritage assets, stating that it is out of date, and intimating a need to update the document, and the prioritisation of this.

A3.253 The following main issues were raised by specific consultation bodies on Policy PLP54: Listed Buildings:

- **Historic England** comment that criterion 1a) (of PLP 54) may unintentionally constrain delivery of enhancements, by focusing solely on how loss can be avoided as a way of demonstrating compliance. This merits alteration. In light of this, they suggest a possible re-wording as follows: 'They preserve or enhance the significance of the listed building and its setting by demonstrating how significance is better revealed and/or how that loss

of historic fabric and detail of significance, including internal features, floor plans and the integrity of the rooms, is avoided.'

A3.254 The following main issues were raised by general and other consultation bodies on Policy PLP54: Listed Buildings:

- **The Portsmouth Society** comment that harm versus public benefit is weighed by the Council as above transparency would help public engagement.
- An individual commented that Historic England Guidance Note 7 says that 'It is intended that the revised conservation and design policy currently under consideration for the new local plan, address development relating not only to designated, but also explicitly to un-designated heritage assets.' In Reg 19 the local list is mentioned three times at 11.2:3: '[The Local List] is defined as a 'non designated heritage asset'. Where a building or structure is not included on the Local List the Authority may nevertheless still judge (at its discretion) that it has the status of a non-designated asset for the purposes of decision making. The City's HER will be consulted as part of the process to identify any non-designated assets not included on the Local List.' Yet in Conservation & Built Heritage July 2012 this is said to be an area of very limited stakeholder interest. This is clearly not the case, as recent applications to Historic England to list several buildings vulnerable to demolition such as Hilsea Lido, NatWest Bank, The News Centre and the Solaglass factory at Limberline Spur attest. The Portsmouth List is clearly out of date. There have been no additions to it for 23 years. The last revision was in December 2011 which also had no new buildings added to it then. The Society has offered to contribute our considerable local knowledge accumulated over fifty years to updating the list of buildings of local historic or architectural significance. Planning Officer Mr. Maguire acknowledged our offer, but clearly rather than a piecemeal additive process, a co-ordinated approach is needed with groups such as neighbourhood forums, local history groups, the WEA Architecture group, residents associations and individuals working together to identify buildings to add to the list.
- An individual states that at present the narrow definition of listing means that useful buildings like these are being demolished and their embodied carbon is wasted. When first introduced, Listing had three categories: I, II and III. Currently they are I, II*, and II. A proposal has been made to the DCMS proposing the reinstatement of a listing at Grade III with an assumption against demolition, directly linked to local authorities List of Buildings of Local Significance - in order to address the loss of reusable structures, which is apparent locally. It might be useful and viable to build into listing criteria and planning applications a requirement to balance lost embodied energy against the carbon cost of redevelopment and newbuild. MHCLGs survey launched on 9 September 2024 will focus on legislation, policy, and guidance concerning decisions involving the demolition, redevelopment, or retrofitting of buildings. and they explicitly want to hear about civic societies experience.

Development Management Policy PLP54: Listed Buildings - Council response
How the representations have been taken into account: • In response to comments made by Historic England, the Council has proposed a change to criterion 1(a) in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has also been prepared with Historic England (dated 2025) to address the issues they have raised. • The comment made by The Portsmouth Society is a general statement that does not specify any changes to Policy PLP53. • Comments made by an individual are either general statements and/or matters that can be addressed outside of the Local Plan process, including an update to the Council's 'Buildings of Local Significance' List. Therefore, the Council does not deem it necessary to make any further changes to Policy PLP53.

Development Management Policy PLP55: Conservation Areas

	Number of respondents
Total number of respondents	3
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.255 One respondent feels that the care of and reuse of Portsmouth's architectural and historic heritage needs much greater emphasis in the Local Plan. The Portsmouth Society question whether schemes and guidance for the conservation areas in the city are up to date. Historic England consider the policy to be sound.

A3.256 The following main issues were raised by specific consultation bodies on Policy PLP53: Historic Environment:

- **Historic England** consider the policy to be sound.
- **Historic England** flag that the absence of a conservation area appraisal for Conservation Area number 22: HM Naval Base and St Georges Square is a notable concern. They encourage the Council to be open about this in its Local Plan and commit to preparing such an appraisal as a high priority, explaining why this matters.

A3.257 The following main issues were raised general and other consultation bodies on Policy PLP55: Conservation Areas:

- **The Portsmouth Society** commented on supporting text 11.33 where relevant, new development should also take account of the need or scope to remove unsightly or inappropriate features. This is a very pertinent proposal; but they question how this would be achieved. Updating the schemes of enhancement and guidelines for each of the City's conservation areas is overdue.
- **The Portsmouth Society** ask if, re Table 12.1 an appraisal of one of the existing conservation areas and guideline documents been undertaken by December of each year, since 2020, considering potential delays due to Covid.
- An individual notes that Portsmouth has a good number of conservation areas, but her concern is that as their designation was many years ago, their appraisal needs updating

in collaboration with the residents. City-owned conservation areas, such as Milton Locks, need considerable repair and investment.

Development Management Policy PLP55: Conservation Areas - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- In response to comments made by both an individual and The Portsmouth Society, no change is proposed as para 11.30 of the Pre-Submission Local Plan 2024 notes that the Council will seek to provide an update Conservation Area Appraisal and Guideline documents for the City's conservation areas.

Development Management Policy PLP56: Archaeology

	Number of respondents
Total number of respondents	1
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.258 No general comments made.

A3.259 The following main issues were raised by specific consultation bodies on Policy PLP56: Archaeology:

- **Historic England** deem the policy to be sound.

A3.260 There were no comments received from general or other consultation bodies on Policy PLP56: Archaeology.

Development Management Policy PLP56: Archaeology - Council response

How the representations have been taken into account:

- No changes are proposed to this policy as the only comment made was in support.

Chapter 12: Monitoring

	Number of respondents
Total number of respondents	3
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.261 FOOPA question whether PLP53 and PLP54 are missing from table 12.1 or if there no monitoring for those policies.

A3.262 PCC LHA ask for various wording amends/additions e.g. to use more precise targets and timescales from the LTP4 annual monitoring report.

A3.263 Historic England recommend adding specific reference to the HM Naval Base and St George's Square as a high priority, plus a monitoring indicator linked to heritage at risk.

A3.264 The following main issues were raised by specific consultation bodies on Chapter 11: Monitoring:

- **Historic England** recommend adding explicit reference to 22: HM Naval Base and St Georges Square as a high priority. Also, they recommended including a monitoring indicator linked with heritage at risk.
- **PCC LHA** state that there is potential to use more specific targets and timescales from Portsmouth's LTP4 Annual Monitoring Report. There is also wording on page 287/288 that could be improved: Policy PLP47 text should be updated to: 'To deliver development that minimises the need to travel and maximises the availability of relevant sustainable transport options, so that growth in private motor vehicle use is kept to a minimum'
- **PCC LHA** request that text be updated to: 'Make efficient use of land in Portsmouth and provide appropriate vehicle, cycle and micro-mobility and multi-modal parking (e.g. scooters) in terms of amount, design and layout for residential and non-residential developments.'

A3.265 The following main issues were raised by general and other consultation bodies on Chapter 11: Monitoring:

- **Friends of Old Portsmouth (FOOPA)** query whether table 12.1 should contain all the policies. They note that PLP53 and PLP54 are not listed.

Chapter 12: Monitoring - Council response

How the representations have been taken into account:

- The introduction to Chapter 12: Monitoring from the Portsmouth Pre-Submission Local Plan 2024 and that part of table 12.1 relating to policies now included in the Addendum have been replaced with a new introduction to Chapter 12: Monitoring and a new table 12.1 relating to the new policies in the Portsmouth Pre-Submission Local Plan Addendum 2025. Issues raised on this section have largely been covered by the new section on monitoring.
- A statement of common ground has been prepared with Historic England (dated 2025) to address the issues they have raised.
- In response to comments from PCC LHA, the Council has proposed amendments to table 12.1, in regard to policies PLP47 and PLP48 in the Schedule of Changes to the Pre-Submission Local Plan 2024. A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.

Appendix 1: List of Policies to be superseded by the Portsmouth Local Plan

	Number of respondents
Total number of respondents	0
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.266 No comments were received on Appendix 1: List of Policies to be superseded by the Portsmouth Local Plan.

Appendix 1: List of Policies to be superseded by the Portsmouth Local Plan - Council response

How the representations have been taken into account:

- No comments were received on this Appendix.

Appendix 2: Identified small/medium sites from the 2023 Housing & Economic Land Availability Assessment (HELAA) of less than one hectare with capacity for five or more dwellings

	Number of respondents
Total number of respondents	0
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.267 No comments were received on Appendix 2: Identified small/medium sites from the 2023 Housing & Economic Land Availability Assessment (HELAA) of less than one hectare with capacity for five or more dwellings.

Appendix 2: Identified small/medium sites from the 2023 HELAA of less than one hectare with capacity for five or more dwellings - Council response

How the representations have been taken into account:

- No comments were received on this Appendix. This appendix has been entirely replaced by Appendix 2: Deliverable and Developable sites from the 2025 HELAA (excluding strategic site allocations) in the Pre-Submission Local Plan Addendum 2025.

Appendix 3: Identified sites from the 2023 Housing & Economic Land Availability Assessment (HELAA) of more than one hectare with capacity for five or more dwellings

	Number of respondents
Total number of respondents	0
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.268 No comments were received on Appendix 3: Identified sites from the 2023 Housing & Economic Land Availability Assessment (HELAA) of more than one hectare with capacity for five or more dwellings.

Appendix 3: Identified sites from the 2023 HELAA of more than one hectare with capacity for five or more dwellings - Council response

How the representations have been taken into account:

- No comments were received on this Appendix. This appendix has been entirely replaced by Appendix 2: Deliverable and Developable sites from the 2025 HELAA (excluding strategic site allocations) in the Pre-Submission Local Plan Addendum 2025.

Appendix 4: Marketing Requirements for Change of Use Applications

	Number of respondents
Total number of respondents	0
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A3.269 No comments received on Appendix 4: Marketing Requirements for Change of Use Applications.

Appendix 4: Marketing Requirements for Change of Use Applications - Council response

How the representations have been taken into account:

- No comments were received on this Appendix.

Glossary

	Number of respondents
Total number of respondents	1
Respondents who raised soundness	1
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A3.270 One respondent believes that there should be more clarity around housing-related terms, such as 'Density,' 'HMOs,' 'dwellings,' 'new homes,' and 'habitable rooms.'

A3.271 No responses were received from specific consultation bodies on the Glossary.

A3.272 The following main issues were raised by general and other consultation bodies on the Glossary:

- One individual suggests that the current definition of 'Density' may be easily interpretated and/or exploited. There should be greater clarification.
- An individual states that definitions and descriptions should be provided for terms such as ' 'HMOs,' 'dwellings,' 'new homes,' and 'habitable rooms' to make the plan legally compliant, sound and compliant with Duty to Cooperate.
- Although not specifically related to the glossary, an individual noted that Pre-Submission Portsmouth Local Plan is not easily accessible to the public.

Glossary - Council response

How the representations have been taken into account:

- In response to comments from an individual, clarification of the term ‘Density’ is proposed to be added to the Glossary in the Schedule of Changes to the Pre-Submission Local Plan 2024. This will also resolve one individual's concerns about 'Habitable Rooms' and therefore, the Council deemed it not necessary to add a definition of 'Habitable Rooms' to the Glossary.
- In response to an individual's comments about the definition provided for 'HMOs,' the Council deems the definition provided for 'HMOs' in the glossary of the Pre-Submission Local Plan 2024 sufficient. Therefore, no change is considered necessary.
- The Council deems 'New Home' too much of a subjective term to be defined in the Glossary. Therefore, the addition of 'New Home' has not been proposed to the Glossary.
- A definition of 'dwelling' is proposed to be added to the Glossary in the Schedule of Changes to the Pre-Submission Local Plan 2024.

Policies Map

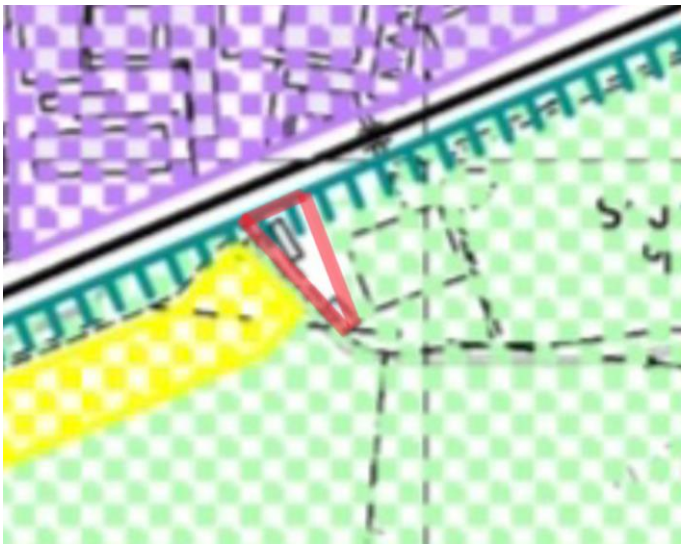
	Number of respondents
Total number of respondents	3
Respondents who raised soundness	2
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	2

A3.273 Friends of Old Portsmouth Association (FOOPA) comment that the map and colouring is very busy, and they are unsure whether the Old Portsmouth Conservation Area is correctly represented. They also query the status of MoD land such as HMS Temeraire.

A3.274 No responses were received from specific consultation bodies on the Policies Map.

A3.275 The following main issues were raised general and other consultation bodies on the Policies Map:

- **FOOPA** state that the Policies Map is too busy. They question whether or not the boundary for the Old Portsmouth Conservation Area is correct as they are unsure if Pembroke Park has been included. They also questioned whether MoD/Services land, such as HMS Temeraire, and other protected sites are available to the City. If they are not, then they should be excluded from the residential density zones referred to in multiple policies, such as PLP16: Housing Target and PLP21: Residential Density.
- Several individuals consider that the Policies Map is not sound, legally compliant and does not comply with Duty to Cooperate.
- One individual suggests that in regards to residential density, there is not enough parking and school spaces, there are increased crime rates and health services are in disarray.
- **ENI Storage (represented by Robert Tutton Town Planning Consultations Ltd)** objects to a specific area being included in a proposed Local Green Space designation for Farlington Playing Field, St John's College Playing Fields and Farlington Triangle. Please see map below:



Policies Map - Council response

How the representations have been taken into account:

- In response to FOOPA's comments, the Council can confirm that the boundary for the Old Portsmouth Conservation Area is correct. The Council does not consider it necessary to exclude areas such as MoD/Services land, and other protected areas from the residential zones identified through Policy PLP21: Residential Density. The rationale for this decision can be found in paragraph 6.119 of the Pre-Submission Local Plan 2024.
- The Council decided not to remove the area outlined in the extract map above from the proposed Local Green Space designation at Farlington Playing Field, St John's College Playing Fields and Farlington Triangle. The rationale for this decision can be found in Appendix 1 of the Local Green Spaces Background Paper.
- One individual's concerns about parking, school places, crime and health services are addressed through other policies in the Pre-Submission Local Plan 2024, such as PLP48: Access and Parking, PLP49: Public Realm and PLP52: New & Existing Community & Leisure Facilities, and so no changes are proposed in relation to those comments.

Sustainability Appraisal

	Number of respondents
Total number of respondents	3
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	1

A3.276 Historic England raise various queries on the accuracy of the document, and note that it provides little help in assessing the different options on housing supply.

A3.277 The following main issues were raised by specific consultation bodies on the Sustainability Appraisal (SA):

- **Historic England** raise an issue about the usefulness of the SA in assessing relative merits of reasonable alternatives in the housing supply and consistency in its outcomes on housing options throughout the document. They also point to an inaccuracy under appraisal of effects on options for industrial/ warehousing development.
- **Historic England** also note there needs to be further articulation, at para 6.72, about the natural and historic environment being integral to each other.
- **Historic England** note the uncertainty of impacts relating to the historic environment, and the dependence on site level schemes demonstrating successful design, layout and integration. They welcome the minor positive effects arising from encouragement to retain historic buildings and support their re-use.
- **Historic England** flag the information used in the SA Scoping Report, page 107, to highlight where development is in proximity to a heritage asset or its setting. They consider this could fundamentally undermine use of the SA and that heritage expertise is crucial to effective assessment of proposed sites, beyond a proximity based approach.

- **NHS Hampshire and Isle of Wight ICB** question whether they should be included as part of the Partnership for South Hampshire, relevant to the Council's Duty to Cooperate Statement and Objective SA6. With regards to that objective: 'Will it have/improve access to health and community facilities and other services? They ask whether a response should highlight the shortage of primary care capacity.

A3.278 The following main issues were raised by general and other consultation bodies on the Sustainability Appraisal (SA):

- **Friends of Old Portsmouth Association (FOOPA)** highlight a range of issues, including with sustainability objectives in section 2.3, including on high rise buildings and not chasing number targets that result in a low quality and high density solution. At section 5.22, FOOPA also question tower blocks built for students, HMO conversions and loss of family housing.
- **FOOPA** question the omission of culture, in terms of support and as a vitality element in SA objectives.
- **FOOPA** state that Table 5.1 is unclear about how housing numbers relate to housing need, how student accommodation and HMOs are included and whether properties are suitable for a range of groups e.g. the elderly, single parents, young couples and older singles.
- **FOOPA** point to not all small / medium sites appearing on the brownfield map in the consultation.
- **FOOPA** make additional comments on biodiversity and offsetting, on City Wide Transport provisions and on the Clean Air Implementation Zone, which they consider weak and with opportunity to do much more.
- **FOOPA** also raise concern about increased pressure on utilities, including water supply and waste water treatment.

Sustainability Appraisal - Council response

How the representations have been taken into account:

- Responses relating to the SA are addressed by the consultants who prepared the SA (Aecom) in Appendix C of the SA Report Update (supporting the Local Plan Addendum) 2025.

Habitats Regulations Assessment

	Number of respondents
Total number of respondents	4
Respondents who raised soundness	3
Respondents who raised legal compliance	3
Respondents who raised Duty to Cooperate	3

A3.279 Representations received on the HRA focussed on the assessment of Policy PLP3, particularly the derogations case presented in Section 8 of the report. RSPB, Environment Agency, Natural England and Hampshire & Isle of Wight Wildlife Trust provided the most extensive comments.

A3.280 The following main issues were raised by specific, general and other consultation bodies on the Habitats Regulations Assessment:

With regard to the derogations:

- **Environment Agency, Natural England, RSPB** and **Hampshire & Isle of Wight Wildlife Trust** considered that insufficient information had been provided regarding various parts of the Derogations case but particularly regarding the compensation section.
- Questions were raised by **RSPB** and **HIWWT** over the extent to which a functional assessment of habitat to be lost from Portsmouth Harbour SPA had been undertaken, beyond relying on the calculations in the SPA Impact Metric.
- **Environment Agency, Natural England, RSPB** and **HIWWT** raised concerns over the amount of information available on the pool of potential compensation sites.
- **RSPB** argued that the assessment failed to consider the potential relationship of the lost habitats to species populations that form part of the adjacent SPA/Ramsar site populations.

Outside of the derogations:

- **Environment Agency** queried whether ‘in combination’ effects between Policy PLP3 and the North Solent Shoreline Management had been considered in the HRA.
- **RSPB** and **HIWWT** both argued that the HRA’s approach to the loss of SPA functionally linked land (i.e. Solent Wader and Brent Goose Sites) within or adjacent to the Tipner West allocation site was inadequate to rule out further adverse effects at the plan stage.
- **RSPB** argued that there was no assessment of the likely impacts to Core Area P75 from the Tipner West allocation (PLP3).

Habitats Regulations Assessment (HRA) - Council response

How the representations have been taken into account:

- All of the representations received on the HRA which were made in respect of the derogation process have been superseded by the approach taken in the new Policy PLP3 of the Portsmouth Local Plan Addendum 2025. The latest HRA (September 2025) has been updated to reflect this namely that derogation is no longer required.
- Regarding lack of information relating to compensation, this was addressed at the time by the production of a HRA Supplement which included a discussion of the functional role of the areas of SPA habitat to be lost and how each potential compensation site could meet the functional requirements of the SPA features affected.
- A statement of common ground has been prepared with Natural England (February 2026) to address the issues they have raised.
- The Environment Agency's query in relation to Policy PLP3 and the Shoreline Management Plan was covered by the HRA for the Shoreline Management Plan which maintains a 'hold the line' position for Tipner West. A statement of common ground was prepared with the Environment Agency to address the issues they raised (dated 2024). This has since been superseded by an updated statement of common ground (dated 2026).
- Paragraphs 6.39 to 6.45 of the HRA (September 2025) address the impacts of the proposals at Tipner on functionally linked land. The HRA indicates that the wording of the Local Plan policies including the requirement for detailed survey work to inform mitigation at a project level stage is sufficient to address impacts on supporting habitat at Tipner.
- Paragraphs 6.44 to 6.62 and 6.81 of the HRA (September 2025) specifically address Core Area P75.

Evidence Based Studies

	Number of respondents
Total number of respondents	26
Respondents who raised soundness	15
Respondents who raised legal compliance	15
Respondents who raised Duty to Cooperate	15

A3.281 No overarching general themes can be pulled out. Each respondent had very specific concerns or points to make, including Southern Water warning that further investment may be needed to ensure water/wastewater capacity is sufficient, the NHS being concerned that there is no explicit mention of mandatory healthcare infrastructure provision, concern from HCC that the Horsea-Tipner bridge must be completed on time and on stated budget, concern from PDPLA over build to rent housing not being affordable for typical Portsmouth renters, housing target being too low, no written plan for the replacement of ageing housing stock and some housing documentation missing or being outdated. On transport, issues arising are to ensure the SRN is not negatively impacted and that sufficient mitigation is in place including

plans to reduce reliance on cars. Premier Marinas would like two of its sites included in the allocations namely Southsea Marina and Trafalgar Wharf.

A3.282 Several individuals including a PCC Councillor commented that a number of documents named in the Core Document Library were not available to view during the consultation.

A3.283 Premier Marinas promoted two sites for allocation namely Southsea Marina and Trafalgar Wharf in their comment on Other Evidence Base.

A3.284 The following main issues were raised by specific, general and other consultees on Evidence Based Studies:

Housing & Economic Development Needs Assessment (HEDNA)

- **Portsmouth and District Private Landlords Association** (**PDPLA)** highlight the large proportion of old housing stock (more than 100 years old) in the City and the structural, energy efficiency, amenity and safety issues associated with it, and lack of adequate maintenance. This is a particular issue for older people in Portsmouth, living in old properties ill-suited to their needs. Whilst the HEDNA includes estimates for the increase needed in stock quantity, it does not give an appropriate rate of replacement of old housing stock, nor the expected levels of investment needed to update and maintain existing stock to improving standards e.g. on energy efficiency.
- **PDPLA** note that the HEDNA states that build-to-rent can help meet increased need for rental properties, it does not address affordability. The representation goes on to state that the demographics of Portsmouth's renters are not well suited to the higher cost of build-to-rent, in comparison to older dwellings. They suggest new-build for this type of housing is best targeted at a demographic with some wealth i.e. downsizers age 50+.
- **PDPLA** also note the absence of the Housing Background Paper and HMO Topic Paper, and point out that the Housing Standards SPD is over 10 years old.
- **CPRE** consider Portsmouth's unique challenges relating to its geography and demographic performance. They consider the LPA has been diligent in its identification of development opportunities, and go on to outline the 'stark and sound evidence' presented in the HEDNA on the City's housing market and population projections, and the link between economic forecasts and housing need. They consider that this evidence justifies a demographically lower housing need than the standard method, and state that Portsmouth's standard method housing target is demographically unrealistic. They acknowledge HEDNA's recommendation to stick with the standard method target, and state that 'PCC believe that the standard method target is impossible and therefore demonstrates this by planning for 680 dpa.'

Development Viability Assessment

- **NHS Property Services** state that the financial contribution tested (£1,000 per unit through Section 106) in the Viability Assessment is low and may be insufficient to support adequate healthcare. At this stage they are therefore, unable to determine whether the assessment of plan-wide viability demonstrates that policy requirements in relation to health are deliverable. They are concerned that without specific mention of required healthcare mitigation, it may compete with other planning obligations and be ignored, rendering development unsustainable, will exacerbate existing strain in healthcare facilities and put future residents' health at risk. The Viability Assessment should include a separate cost input for typologies where a healthcare contribution is expected, to ensure appropriate weighting of healthcare mitigation with regard to other planning

obligations. On-site and off-site financial contributions would support effective implementation of Policy PLP50 where a [assumed site specific] viability assessment demonstrates development is unable to fund a full range of infrastructure requirements. They welcome engagement with the Council to determine a reasonable cost assumption to be used in future viability assessments.

Infrastructure Delivery Plan (IDP)

- **Southern Water** state that Budds Farm's DWF (Dry Weather Flow) permit allowance measured against current flows provides headroom for approximately 30,000 new dwellings, which will accommodate for the growth expected in Portsmouth over the Local Plan period. However, this can be subject to change dependent on varying factors, such as increased growth forecast, network infiltration/inundation and stricter permit requirements, therefore, there may be a requirement for investment in the 5-year business plan period 2030-2035.
- **Hampshire County Council** support the transport proposals in the IDP and noted it will continue to work with PCC to develop the cross-boundary schemes. Noted the Horsea-Tipner bridge is a key component of the strategic site policy PLP3. Requested confirmation that the estimated cost of the scheme is accurate and based upon work undertaken to date. Requested reassurance the bridge scheme can be funded and delivered within the Plan period.
- **National Highways** state that a transport evidence base should be provided to demonstrate the Local Plan impact on the strategic road network and as necessary identify suitable mitigation. Noted that once transport impacts of the Local Plan sites are understood, the IDP should set out any strategic road network mitigation required to deliver the Local Plan development. Noted a preferred scheme of improvements have been suggested following modelling undertaken since Regulation 18 consultation for the Portsbridge Roundabout (with the A27) involving partial signalisation of the roundabout. Stated a review of the modelling undertaken is ongoing. Stated it is essential for National Highways and PCC to agree a Statement of Common Ground following National Highway's review of the modelling, which should set out any potential concerns and agreed next steps in advance of the Examination in Public.
- **Network Rail** suggest amendments to the IDP section 3.10 'Rail Services' regarding future needs to deliver growth from the Local Plan for Fratton Station.
- **Langstone Harbour Board** suggest amendments to the IDP section 3.13 'Ferry/Hovercraft Services' to include Langstone Harbour Board as a lead organisation and main source of information, include the Hayling Ferry service within the context and existing Citywide infrastructure provision, and include further planned provision. Stated that the IDP refers to the Hayling/Eastney Ferry but did not involve consultation with the ferry operator or Langstone Harbour. Suggested amendment to the 'Planned Provision section' that PCC have a 50% liability (shared with Havant BC) for maintaining the infrastructure to support the ferry service. Noted the Seafront Masterplan SPD states "At Eastney Point, the ferry terminal could be replaced with an architecturally distinctive pier to add a point of interest to this gateway in and out of the city" and suggested amendment to the IDP to include this.

Strategic Transport Assessment (STA)

- **National Highways** state that when identifying the preferred strategy for the spatial options, consideration will need to be given to assessing the cumulative impact of new

sites that might be taken forward together with already planned growth on the SRN. When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably practicable.

- **National Highways** will support proposals that consider sustainable measures which manage down demand and reduces the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the SRN.
- **National Highways** will continue to work with the Council to resolve outstanding queries, a technical note review will be provided on the Strategic Transport Assessment and associated modelling.
- **Hampshire County Council** state that they support the use of the Solent Transport Sub Regional Transport Model to assess the traffic growth and impacts on the wider network serving Portsmouth and southeast Hampshire. Whilst there is no evidence that the STA has used the SRTM data outputs to examine the wider impact of the Local Plan development beyond the Portsmouth boundary, the City Council has recently provided the County Council with additional information (email dated 29/08/24) to explain that no junctions outside of the Portsmouth boundary within Hampshire met the criteria for additional assessment. For clarity it is requested that this information is included in the STA as an addendum.
- **PCC LHA** state that they are content with the mitigation scheme proposals submitted in sections 6, 7 and 8 of the STA and that the technical evidence base that underlines the work is robust. It should be noted however that the City Centre allocation is reliant upon mitigation beyond the proposed changes to the road scheme to make the proposals acceptable. Tipner Travel Hub in particular is critical to ensure the revised road network operates without severe impacts (and the resultant negative air quality impacts).
- **PCC LHA** state that over time, the LHA and PCC will be looking for developers to avoid the need to mitigate development impact through highway capacity schemes (as has been tested in this local plan TA) and instead use master planning to reduce car dependency and the need to travel and to design their developments to prioritise sustainable modes of movement first, ahead of motor vehicles.
- **Langstone Harbour Board** state the STA does not reference inshore ferry services like the Hayling/Eastney Ferry or this service's contribution to cycle/walking networks.
- **Portsmouth Cycle Forum** considered the STA positive that more consideration of active travel has been. They were concerned that the "preferred mitigation" didn't ensure sufficient space for walking and cycling infrastructure for areas of ongoing concern to Portsmouth Cycle Forum including Spur Road roundabout, Portsbridge roundabout and the access to Lakeside. It is also not clear if walking and cycling measures are included in the cost estimates.
- **Portsmouth Cycle Forum** state that it would be beneficial for Policy PLP47 to explicitly state that these designs would need to meet LTN1/20 and appropriate relevant guidance on walking.

Evidence Based Studies - Council response

How the representations have been taken into account:

- The HEDNA has been updated since the 2024 consultation took place and is now supplemented with the HEDNA Update 2025.
- The Housing Background Paper has been published which explains the general approach to housing in the emerging Local Plan.
- The Council considers the levels of financial contributions included in the Development Viability Assessment to be appropriate and does not consider it necessary to increase the level considered in the study specifically for healthcare.
- In response to comments on the IDP from Southern Water, National Highways, Network Rail, and the Langstone Harbour Board, sections 3.8, 3.10, 3.13, and 3.21 of the IDP have been updated.
- The IDP has been updated since the 2024 consultation took place and has been replaced by the 2025 Interim IDP and Submission IDP 2026.
- A statement of common ground has been prepared with PCC Children, Families and Education department (dated July 2024) regarding the IDP and the wider Local Plan. They made no representations on the Portsmouth Pre-Submission Local Plan 2024.
- A statement of common ground has been prepared with National Highways (dated February 2025) to address the issues they have raised in respect of the STA. The STA has been updated in response to requests from National Highways, notably in respect of Portsbridge Roundabout.
- In response to the National Highways' comments on the STA regarding the Strategic Road Network (SRN), the NH Technical Note (240524) provides a detailed assessment on the SRN impacts and the optioneering associated with mitigation at Portsbridge. The assessments are presented within the updated Strategic Transport Assessment Addendum (STAA) which responds to the slight reduction in allocation quantum; the conclusions regarding the appropriateness of the mitigation remain valid. The mitigation proposed at Portsbridge does not make any adjustments to the A27 off-slip, however the partial signalisation of the roundabout helps with gap acceptance for vehicles exiting the A27 as demonstrated by the results presented in the STAA.
- National Highways' comments on the STA regarding infrastructure improvements to the SRN are noted and the cumulative impact has been considered, acknowledging the requirements of DfT Circular 01/2022 which is referenced in the STAA within the policy section and has informed the strategy for mitigation. The mitigation proposed at Portsbridge does not make any adjustments to the A27 off-slip, however the partial signalisation of the roundabout helps with gap acceptance for vehicles exiting the A27.
- In response to comments on the STA made by HCC, the following sentence was added to the February 2025 Strategic Transport Assessment, under Table 9 ‘It is noted that a review of the wider strategic plots was undertaken to assess whether any junctions outside of the PCC boundary should be considered a severe impact junction. It was ascertained that all category 1 junctions were within the PCC boundary due to the V/C increases not being significant enough to exceed a 10% increase on links already exceeding 95%’. The wider view plots presented in the

STA Addendum Appendix include some of the adjacent junctions within HCC supporting that they do not exceed these threshold criteria.

- In response to PCC LHA's comment on the STA, reference to the Transport Hub at Tipner is included in Table 2 and para 3.3.2 of the STA Addendum, stating that it supports the necessary modal shift to support the level of development growth within the City Centre but it is acknowledged that this was not captured in the modelling assessments due to funding constraints of delivery and limited detail on bus routing available at the time of modelling. A statement of common ground has been prepared with PCC LHA (dated November 2024) to address the issues they have raised.
- In response to comments made by Langstone Harbour Board on the STA, no adjustment was considered necessary to the STA given that the STA does not specifically comment on baseline conditions for wider transport services, it only refers to those which have an impact on the category 1 locations where impacts have been identified.
- In response to the Portsmouth Cycle Forum's comments on the STA, the mitigation schemes proposed have considered the potential for improvements for active modes where feasible, noting spatial limitations in some locations. For example, the following interventions have active modes as a key component of the design interventions, Spur Road roundabout seeks to address an existing collision hotspot location and reduces the circulatory lanes on the roundabout and introduces a cycle crossing. A through cycle link from Kings Rd is proposed to link with the East West Active Travel Corridor. The City Centre Road scheme includes improvements to pedestrians, cyclists, and buses through implementing signalised crossings and bus lanes with road space reallocation and restricted movements for private vehicles (by having bus lanes) supporting the reduction of traffic. The cost estimates capture the full extent of the mitigation presented in the mitigation drawing appendix at Appendix H of the February 2025 Strategic TA.
- In response to the Portsmouth Cycle Forum's comments on the STA on policy PLP47 this Local Plan policy is not directly referenced in the STA, however, it is agreed that as the schemes develop though subsequent design stages they will be required to be developed further in accordance with LTN 1/20 where possible.

Appendix 4: Summary of main issues raised on the Portsmouth Pre-Submission Local Plan Addendum 2025 pursuant to Regulation 20 and the Council's response

Preface

	Number of respondents
Total number of respondents	0
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A4.1 No comments were received regarding the Preface.

Preface - Council response
How the representations have been taken into account: • No comments were made on the Preface.

Chapter 3: Development Strategy

	Number of respondents
Total number of respondents	2
Respondents who raised soundness	2
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	0

A4.2 The following main issues were raised by specific consultation bodies on Chapter 3: Development Strategy:

- The **Home Builders Federation** highlighted that the plan period on adoption in 2027 will only be thirteen years, which is two years less than the minimum plan period of fifteen years required by the NPPF. They, therefore, consider that the Plan period should be extended by two years prior to submission in order to ensure consistency with national policy.
- **Network Rail** welcomed the reference to the Solent Connectivity Study in paragraph A22 of the Addendum.

A4.3 No comments were received from general or other consultation bodies on Chapter 3: Development Strategy.

Chapter 3: Development Strategy - Council response

How the representations have been taken into account:

- Following work on the Pre-Submission Local Plan Addendum 2025, the Plan period was changed from 2020-2040 (as per the 2024 PLP) to 2025-2040. This decision was justified as it removes five years of historic development from the Plan and ensures that it is forward looking and positively prepared. Consequently, the strategic policies within the Plan now only look ahead over a 13 year period from the anticipated date of adoption, rather than 15 years. This is inconsistent with national policy. However, if the Council had extended the end of the plan period to achieve 15 years, substantial changes would have been required to the evidence base and thus, progress on the Plan would have been further delayed. Therefore, it is considered that the 13 year time period is justified. This was discussed with our advisory Inspector, who wrote in his advice to the Council that 'Rebasing the start of the plan period to 1st April 2025 is justified and reflects that the standard method is forward looking.'

Chapter 4: Strategic Sites

	Number of respondents
Total number of respondents	1
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A4.4 The following main issues were raised by specific consultation bodies on Chapter 4: Strategic Sites.

- **NHS Hampshire & Isle of Wight Integrated Care Board (NHS Hampshire & Isle of Wight ICB)** highlight that Chapter 4 omits assessment of primary care infrastructure implications of housing growth at Tipner West, Tipner East and Portsmouth City Centre and provides no mitigation for existing capacity constraints. They recommend site-specific policies require healthcare facilities funded by developer contributions and co-ordination with them to align new housing with health infrastructure planning. They call for a cumulative impact analysis of strategic site development on GP provision to identify service risk. With most local practices already over capacity, they stress that integrating health infrastructure into strategic site policies is essential to prevent further pressure on services and avoid worsening health inequalities.

A4.5 There were no comments received from general or other consultation bodies on Chapter 4: Strategic Sites.

Chapter 4: Strategic Sites - Council response

How the representations have been taken into account:

- The comment from NHS Hampshire & Isle of Wight ICB repeats their comment on the whole local Plan made in their response to the Portsmouth Pre-Submission Local Plan 2024, as such the Council's response is unchanged. Discussions with the NHS Hampshire & Isle of Wight ICB are ongoing in relation to submissions for Community Infrastructure Level funding for healthcare premises. Engagement on future GP premises needed to deliver Local Plan growth is set out in the Infrastructure Delivery Plan.

PLP3: Tipner West

	Number of respondents
Total number of respondents	10
Respondents who raised soundness	6
Respondents who raised legal compliance	6
Respondents who raised Duty to Cooperate	6

A4.6 The following main issues were raised by **PCC as the site promoter** on Policy PLP3: Tipner West:

- They are content with Policy PLP3 for Tipner West, which has followed constructive engagement with the Local Planning Authority throughout 2025. They note that it will form a crucial step for the Council in delivering this site pursuant to the City Deal award of 2013 whilst having regard to the need to balance delivery of new homes and employment with protection of nature. PCC promoter team is satisfied that the Local Plan Addendum is sound, legally compliant and meets Duty to Cooperate requirements. They are fully supportive of the policy.

A4.7 The following main issues were raised by specific consultation bodies on PLP3: Tipner West:

- **Natural England** note that previous concerns raised have now been addressed and no longer challenge the soundness of the Local Plan. They note that the allocation would no longer result in permanent direct habitat loss to the Portsmouth Harbour designated sites. They consider that the loss of functionally linked land (site P60) has been adequately considered in the supporting HRA and the policy framework in the Local Plan safeguards the necessary assessment and mitigation measures at the project-level HRA stage.
- The **Environment Agency** notes that the amended policy has removed the need for reclamation and now provides a sound basis for sustainable development, through which environmental enhancement can be realised.
- **Historic England** raise a concern about criterion PLP3.5 of the policy, in that reference to the D-Day slipways at Horsea Island East combines multiple considerations, including setting and significance of Portchester Castle. They suggest that it would be better to separate out considerations of the D-Day slipways, Portchester Castle and on-site heritage assets and to this end they proposed a new criterion (PLP3.6) specific to the D-Day slipways be added as follows:
'5. 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 the enhancement of their fabric and/or setting.
NEW PARA 6. ~~In addition~~, ~~a~~Any proposals must demonstrate a full understanding of the ~~contribution of views towards to the site, to the setting and therefore the~~ significance of ~~both the Scheduled Portchester Castle across the Harbour, and~~ the D-Day Slipways adjoining Horsea Island East and should avoid or minimise harm to their significance from development in their setting. ~~seek where possible to avoid or mitigate any unnecessary harm to their setting.~~ The impact (or potential impact) of any proposals on non-designated archaeology within the inter-tidal zone ~~either within, and/or if necessary, below mean high water springs around the site,~~ shall also be assessed, including field evaluation if needed, and recorded, and harm avoided or minimised ~~where possible mitigated~~ in proportion to the significance of any remains~~(find(s).'~~

- **Hampshire County Council (HCC)** emphasise the necessity of sustainable transport connectivity for Policy PLP3: Tipner West. They say that the bridge connection forms part of the SEHRT and could enable new bus routes linking Tipner West to origins north of the City and destinations in Portchester and Fareham. They indicate that clarification is needed on funding and delivery schedules for the sustainable transport modes bridge within the Local Plan period. They suggest that policy wording under 3.j) be amended to provide enhanced pedestrian and cycle links between Tipner West, the City Centre, residential areas north of the City and along the A27 corridor, nearby public open spaces, recreational facilities including the Mountbatten Centre, and other local shops and services. They flag that the new bridge between Tipner West and Horsea Island could be essential to avoid car dependency among future residents.
- **Fareham Borough Council** note that the policy makes reference to the need for future development to respond sensitively to the significance of Portchester Castle, including its setting. They request that they are consulted on any future proposals for the site.
- **Winchester City Council** note the changes to the policy and have no comment to make.

A4.8 The following main issues were raised by general and other consultation bodies on PLP3: Tipner West.

- **RSPB** consider that the policy would now be consistent with the Council's commitment to addressing twin climate and biodiversity emergencies as set out in Chapter 3 of the Local Plan. They indicate that protection of the intertidal and terrestrial areas of the SPA/Ramsar sites would aid nature recovery whilst also preventing the release of stored carbon from intertidal sediment, and that new residents would have a rich natural environment on their doorstep. They welcome criterion 4 of the policy (relating to the terrestrial SPA/Ramsar south of the firing range), whilst flagging that the Council remains under a statutory duty to manage this land. They note that there remain challenges associated with loss of functionally linked land (P60), avoidance/mitigation of recreational disturbance to the SPA/Ramsar habitats and potential damage through construction of the proposed bridge but these can be addressed at the project-level HRA stage.
- **RSPB** strongly recommend that replacement habitat for the functionally linked habitat being lost is identified at the earliest opportunity. They indicate that effectiveness of the Local Plan would be improved by providing details of the off-setting site for the primary support area P60. They consider that it has not yet been demonstrated that this mitigation is achievable and P60 is the only site for which specific replacement habitat has yet to be identified.
- **RSPB** welcome the recommendations within the supporting report 'Tipner West SPA Recreational Disturbance Mitigation Study (Holbury Consultancy Services, Oct

2025).' They consider that the report generally supports the RSPB's and Wildlife Trust's vision for a 'nature positive' Tipner West development. They suggest that existing recreational resource at Stamshaw Park, Alexandra Park and Mountbatten Centre may need to be enhanced, and this will require further project-level HRA.

- **RSPB** consider that policy PLP3 can be delivered without leading to adverse effects on the statutory designated wildlife sites and that the Local Plan meets the necessary legal and policy duties.
- **Southern Water** state that land owned by Southern Water within the allocated site should be safeguarded with a minimum 15m gap between any wastewater pumping station and sensitive development to be incorporated into site layouts.
- **A member of the public** notes concern that the development of housing on the allocated site would adversely affect the nature conservation interests of the three harbours. They indicate that mitigation measures can only address a limited amount of the disturbance as these are already at capacity. As such, they suggest that the Council cannot demonstrate that the designated sites would not be adversely affected and the Plan is therefore unsound and unlawful. They note that due to sea level rise, intertidal habitats are exposed less and loss of high tide roosts and feeding areas are a concern. These losses are cumulative, exacerbated by the construction and occupation of new housing. They flag that all Harbour sites are intrinsically linked and harms to Portsmouth Harbour will be sequential with Langstone and Chichester Harbours. They suggest that new development should build upwards, not outwards, and that demands for student housing are compromising the availability of land for housing.

PLP3: Tipner West - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with PCC site promoter (dated March 2026) to address the issues they have raised.
- Overall, only very minor changes are considered necessary to the policy and supporting text as either the wider policy framework (in particular policies PLP42: Solent Waders and Brent Geese sites and PLP43: Recreational Disturbance on International Nature Designations) address all of the points raised or any concerns would be addressed through project-level HRA and/or planning application detail. The supportive responses from Natural England, Environment Agency and RSPB are welcomed and demonstrate the constructive engagement undertaken through the Tipner West Regulatory Panel.
- Statements of common ground have been prepared with Natural England (dated February 2026) and the Environment Agency (dated February 2026) to address the issues they have raised.
- In response to Historic England's representation, the Council has proposed a minor amendment to criterion 5 of Policy PLP3: Tipner West in the Schedule of Changes to the Pre-Submission Portsmouth Local Plan Addendum 2025. Consideration has been given to the suggested amendments from Historic England of creating a separate criterion relevant to the D-Day slipways, Portchester Castle and on-site heritage assets. However, PCC concludes that the existing criteria remain acceptable, with PLP3.5 highlighting the principal heritage considerations and the expectations upon applicants to address significance and setting considerations in their submissions at the project-stage. The D-Day slipways are no longer immediately adjacent to this strategic site allocation (they were in the previous iteration of PLP3 in the Portsmouth Pre-Submission Local Plan 2024) and the site allocation boundary is restricted to land above mean-high water level, so bespoke reference to inter-tidal archaeological assessment within

policy PLP3 is not considered necessary; this is covered by policy PLP53: Historic Environment and PLP56: Archaeology.

- With regard to the proposal by HCC for the inclusion of the Tipner West-Horsea Island East bridge link within the policy, no change has been proposed. The delivery of Tipner West separate to Horsea Island East (as in the previous iteration of policy PLP3) is considered to be possible so long as the necessary land is safeguarded for the bridge's delivery. This reflects the uncertainty at this stage in the timing and funding of the bridge link, notwithstanding the aspirations within local transport plan and SEHRT partners. The proximity of the Tipner Park and Ride facility as well as good cycle connectivity to the City Centre will aid sustainable travel choices for residents of Tipner West ahead of delivery of the proposed bridge link.
- Fareham Borough Council would be consulted as a matter of course on any planning application considered of such significance as to affect the setting of Portchester Castle, so it is not considered necessary to propose adding an express requirement for this to the policy.
- A statement of common ground has been prepared jointly with the RSPB and Hampshire and the Isle of Wight Wildlife Trust (HIWWT) (dated February 2026) to address the issues they have raised.
- The Council does not consider the safeguarding for Southern Water infrastructure to be necessary as this is existing infrastructure which would be taken into account at the project level master-planning stage.
- A statement of common ground has been prepared with the Marine Management Organisation (dated February 2026) as a member of the Tipner West Regulatory Panel, but they did not make any representations on the Portsmouth Pre-Submission Local Plan Addendum 2025.
- Other comments expressing concern about the capacity of existing mitigation measures are addressed through the policy criteria for PLP3 and also through policies PLP42 and PLP43. These are, subject to minor modifications, considered acceptable by Natural England. Detailed mitigation measures and full assessment of impacts upon inter-tidal habitats would be considered through project-level HRA where the precautionary principle applies to decision-making. Issues raised relating to housing provision and site density will be considered robustly at the project level and should comply with the policies of the development plan.

PLP6: Portsmouth City Centre

	Number of respondents
Total number of respondents	4
Respondents who raised soundness	3
Respondents who raised legal compliance	3
Respondents who raised Duty to Cooperate	2

A4.9 The following main issues were raised by one of the site promoters **(PCC Promoter for City Centre North (ref. CD17 from the HELAA))**:

- **PCC Promoter** (responsible for City Centre North) highlight that Policy PLP6 reflects positive engagement between the local planning authority and the promoter team.

A4.10 The following main issues were raised by specific consultation bodies on Policy PLP6: Portsmouth City Centre:

- **Historic England** ask that heritage assets are woven into the City Centre Vision adding to the emphasis on historic character and local distinctiveness in Policy PLP6. They state that stronger design criteria will encourage new development to respond positively to heritage. Historic England believe heritage-led public realm

improvements would have knock-on economic and cultural benefits. They ask for an addition to the City Centre North and Victoria Park description ensuring that the area's heritage assets will be conserved and their significance better appreciated. They suggest adding the following wording to the Vision: 'make it a green and pleasant centre for residents and visitors. The area's heritage assets will be conserved and their significance better appreciated. People will live…'

- **Historic England** ask that Policy PLP6 requires development proposing increased building height and density to assess the impact on heritage assets and their settings.
- **Historic England** suggest drawing from the wording of criterion 5, which refers to avoiding unacceptable harm to the historic environment, into criterion 4 of Policy PLP6 to broaden heritage considerations beyond designated assets and to align with paragraph A91's reference to non-listed buildings of architectural and historic interest. They propose the following amendment to criterion 4:
- 'Development proposals within the area should also seek to avoid unacceptable harm to the historic environment significance of designated heritage assets within the area.'
- **Historic England** suggest the following amendment to paragraph A94 so that the focus is on impacts on significance, rather than on setting:
'Proposed buildings of height and increased density should consider any impacts on the significance of the setting of Portsmouth and Southsea Station (Grade II listed), the Cenotaph (Grade II* listed) and Victoria Park (Grade II listed) through development in their settings.'
- **Historic England** suggest the following amendment to paragraph A99 so that the focus is on impacts on significance, rather than on setting:
'Proposals will need to take account of any impacts on the significance ~~the settings~~ of heritage assets through development in their settings. Assets, ~~which~~ include, among others, Victoria Park (Grade II), the (Grade II*) Cenotaph and listed buildings along Guildhall Walk including the New Theatre Royal (Grade II*).'
- **Network Rail** welcome the amended wording in criterion 5 of Policy PLP6: Portsmouth City Centre, which highlights the need to consider the capacity of Portsmouth and Southsea rail station and mitigate the impact of additional users.

A4.11 The following main issues were raised by general and other consultation bodies on PLP6: Portsmouth City Centre:

- **PCC Drainage** state that Policy PLP6 should include SuDS wherever possible due to the City Centre's predominantly combined sewer system.
- **PCC Drainage** note that reducing sewer flows in Portsmouth City Centre has City wide benefits by reducing pressure on the sewer network pressure at critical points such as Henderson Road and Eastney pumping station.

PLP6: Portsmouth City Centre - Council response

How the representations have been taken into account:

- Comments from PCC Promoter are welcomed; no change has been requested. A statement of common ground has been prepared with PCC Promoter (dated March 2026) regarding City Centre North.
- A statement of common ground has been prepared with PCC Promoter (dated March 2026) regarding 56 Arundel Street - Shopmobility, part of the Portsmouth City Centre allocation. PCC Promoter made no representations regarding this site on the Portsmouth Pre-Submission Local Plan Addendum 2025.
- A statement of common ground has been prepared with FRG Properties Limited (dated March 2026) regarding 194-198 Commercial Road. They made no representations regarding this site on the Portsmouth Pre-Submission Local Plan Addendum 2025.
- In response to Historic England's representation, the Council has proposed amendments to paragraphs A94 and A99 in the Schedule of Changes to the Pre-Submission Portsmouth Local Plan Addendum 2025. The Council does not consider it necessary to propose any other changes to the policy in response to the Historic England representation.
- In response to comments from PCC Drainage on the general inclusion of SuDS in the City centre, the Council has not proposed any changes as it is considered to be already covered by policy PLP32 of the Local Plan.

PLP7: Fratton Park & the Pompey Centre

	Number of respondents
Total number of respondents	1
Respondents who raised soundness	1
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	0

A4.12 No representations were received from site promoters of PLP7: Fratton Park & the Pompey Centre.

A4.13 The following main issues were raised by specific consultation bodies on PLP7: Fratton Park & the Pompey Centre:

- **Network Rail** welcome the addition of wording in criterion 3 of the policy requiring new development to consider impacts on Fratton Station.

A4.14 There were no comments received from general or other consultation bodies on PLP7: Fratton Park & the Pompey Centre.

PLP7: Fratton Park & the Pompey Centre - Council response

How the representations have been taken into account:

- A statement of common ground has been prepared with Portsmouth Football Club, the site promoter of Fratton Park, (dated August 2025) regarding the Portsmouth Pre-Submission Local Plan Addendum 2025. They made no representations on the Portsmouth Pre-Submission Local Plan Addendum 2025.

PLP9 Horsea Island Strategic Open Space

	Number of respondents
Total number of respondents	2
Respondents who raised soundness	1
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A4.15 The following main issues were raised by specific consultation bodies on PLP9: Horsea Island Strategic Open Space:

- **Natural England** highlight that PLP9 has the potential to impact functionally linked land parcels P48C and P75. Section 3c sets out the requirement to avoid impacts to the functionally linked land which NE support.

A4.16 The following main issues were raised by general and other consultation bodies on PLP9: Horsea Island Strategic Open Space:

- **RSPB** raise that Part 3b is proposed for revision to include all Solent Waders and Brent Goose Strategy core and primary support areas within the allocation boundary. Part 3b currently omits site P48c, the largest of the four SWBGS sites, resulting in inconsistent referencing of supporting sites.
- **RSPB** state that current wording in criterion 3(c) repeats language on non-breeding bird surveys that casts doubt on the importance of well-evidenced SWBGS sites. Replacement text is proposed as follows: 'To meet the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), the developer should provide evidence that the development of the allocated site will not result in the loss of habitat that is functionally linked to the Solent's SPAs. <u>To demonstrate this, non-breeding bird surveys between October and March (typically three survey seasons) may be required to determine if the allocation itself or land adjacent to it, constitute an area of significant supporting habitat. If the site is found to be functionally linked to Habitats sites, mitigation and/or avoidance measures will be required.'</u>
- **RSPB** identify that the western part of the allocation (covered by supporting habitat) is currently open to the public and ask what the mechanism will be for the detailed assessment of impacts on these areas and how any necessary mitigation measures will be secured.
- **RSPB** raise concerns around the area safeguarded for landfall of the future bridge link to Tipner West which lies directly within a Core Area for waders and Brent Geese (P75).
- **RSPB** ask for alignment between Policy PLP9's wording and supporting paragraph a138 to ensure spa/Ramsar supporting sites are protected from both *loss of or*

damage to habitat that is functionally linked to the Portsmouth Harbour SPA and habitat loss arising from increased recreational pressure.

PLP9: Horsea Island Strategic Open Space - Council response

How the representations have been taken into account:

- The comments from Natural England are welcomed by the Council. No change to the policy has been requested. A statement of common ground has been prepared with Natural England (dated February 2026) to address the issues they have raised.
- In response to RSPB's comment on the omission of P48c, the Council has proposed that is added to the policy in the Schedule of Changes to the Pre-Submission Portsmouth Local Plan Addendum 2025.
- In response to RSPB's point regarding surveys, a change is proposed by the Council in the Schedule of Changes to the Pre-Submission Portsmouth Local Plan Addendum 2025 to address this.
- In response to RSPB's comments on the western parts of the site, the Council will ensure that future project level proposals for Horsea Island and Port Solent will assess the impacts on the supporting habitat and provide mitigation if required.
- Regarding RSPB's comment on the landfall of the proposed bridge, the Council considers that this will be dealt with at a project level issues and does not require policy change in the Local Plan.
- In response to RSPB's request for amendment to reference damage as well as loss, this has been addressed through a change proposed to criterion 3 (c) in the Schedule of Changes to the Pre-Submission Portsmouth Local Plan Addendum 2025.
- The Council does not propose any changes in response to RSPB's comments regarding impacts from the bridge landfall within SWBGS core area P75 as the Council considers it appropriate to deal with this at the project level.
- A statement of common ground has been prepared jointly with the RSPB and HIWWT (dated February 2026) to address the issues they have raised.

Chapter 5: Site Allocations

	Number of respondents
Total number of respondents	0
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A4.17 No comments were received regarding Chapter 5: Site Allocations.

Chapter 5: Site Allocations - Council response

How the representations have been taken into account:

- No comments were made on Chapter 5: Site Allocations.

PLP10: Land West of Portsdown Technology Park

	Number of respondents
Total number of respondents	6
Respondents who raised soundness	3
Respondents who raised legal compliance	3
Respondents who raised Duty to Cooperate	3

A4.18 The following main issues were raised by the **site promoter Heritage Property Southern Limited** on Policy PLP10: Land West of Portsdown Technology Park:

- They support the allocation and believe it to be sound and legally compliant.

A4.19 The following main issues were raised by specific consultation bodies on PLP10: Land West of Portsdown Technology Park:

- **Fareham Borough Council (FBC)** support the site-specific requirements to develop a landscaping scheme and comprehensive landscape design strategy. They welcome further opportunities for joint working.
- **Hampshire County Council (HCC)** support the site allocation. They recommend the inclusion of a new policy criterion to read: 'provide enhanced pedestrian and cycle links connecting Portsdown Technology to the B2177 to provide sustainable transport options between Hampshire and Portsmouth's highway networks.' They note that this is highlighted as a local route in the adopted Winchester City Council Local Cycling and Walking Infrastructure Plan, would support Policy HP1 of Hampshire's Local Transport Plan (LTP) 4 and align with the aim of the Portsmouth LTP4.
- **HCC** highlight their previous response to the 2024 Regulation 19 consultation which requested that PLP10 will need to be assessed and addressed in the future via a site-specific Transport Assessment. They note that this comment remains extant.
- **Historic England** suggest two amendments to PLP10 and its supporting text to refer to the significance of heritage assets. They suggest amended wording to policy PLP10 criterion 2.i) to state that 'Any new build development proposals for the site will respond positively to the presence and significance of the following heritage assets:' They also suggest an amendment to paragraph A159 to state 'Careful consideration should be given to ensure that proposals respond positively to the presence and significance of heritage assets.'
- **PCC as Lead Local Flood Authority (LLFA)** note that the policy objectives should include SuDS and minimising run-off from the site. The LLFA state that there may be a requirement for additional foul water infrastructure to deliver any development, which is limited in the vicinity of the site.
- **Winchester City Council (WCC)** raise concern regarding the range of uses proposed and the enlargement of the developable area having the potential for increased adverse impacts which may affect the WCC area. They would prefer it if the area of development be limited to the part of the site comprising the existing previously developed land and request to be kept informed of development proposals at the site.

A4.20 There were no comments received from general or other consultation bodies on PLP10: Land West of Portsdown Technology Park.

PLP10: Land West of Portsdown Technology Park - Council response

How the representations have been taken into account:

- No response is required to the comments raised by Heritage Property Southern Ltd as they support the policy. A statement of common ground was prepared with them (dated August 2025) in advance of the consultation on the Portsmouth Pre-Submission Local Plan Addendum 2025 opening.
- No response is required to the comments raised by FBC as they support the policy.
- No change is proposed in response to HCC's comment regarding the addition of a new policy criterion for enhanced pedestrian and cycle links. The Council considers this is sufficiently addressed by policy criteria 2.c), d) and e) of PLP10.
- In response to comments from Historic England, the Council has proposed amendments to criterion 2.i) and to para A159 in the Schedule of Changes to the Pre-Submission Portsmouth Local Plan Addendum 2025.
- The comments from PCC as LLFA are noted, however, the Council does not consider that further policy-specific criteria related to SuDS and minimising run-off are required as this is already covered by policies PLP31: Flooding and PLP32: Sustainable Drainage Systems.
- No change is proposed in response to WCC's comment regarding the range of proposed uses and developable area. The Council recognises that the proposed allocation is a sensitive site with prominent views to south and north, however, it considers the matter has been robustly addressed through the policy criterion 2.f). A statement of common ground has been prepared with WCC (dated February 2026) to address the issues they have raised.

PLP11: Port Solent

	Number of respondents
Total number of respondents	6
Respondents who raised soundness	5
Respondents who raised legal compliance	5
Respondents who raised Duty to Cooperate	5

A4.21 The following main issues were raised by the **site promoter Premier Marinas and CBRE IM (represented by CBRE Limited)** on PLP11: Port Solent:

- They argue that the site could deliver up to 1,300 dwellings within the plan period, as part of their mixed-use masterplan-approach to the site allocation.
- They suggest that the policy should allow for greater flexibility in terms of the anticipated number of dwellings. They indicate that final numbers should be agreed with the Council at the planning stage.
- They request that table 5.3 is updated to show 1,300 dwellings as being deliverable within the plan period, i.e. within the first 5-10 years of the Local Plan period. They state that the site is available and ready now.

A4.22 The following main issues were raised by specific consultation bodies on PLP11: Port Solent:

- **Historic England** suggest that the supporting text be amended to highlight the importance of heritage significance in regards to Portchester Castle, rather than just focusing solely on the matter of views. They suggest the following amendment to paragraph A183:

  '…The application should be supported by a Landscape and Visual Impact Assessment to show how key viewpoints have been taken into consideration. This includes the protection of wider views, towards the site including from Portchester Castle and other key landmarks. Any development proposals for the site should seek to understand the heritage significance of the Castle, including the contribution to significance made by its setting, and the scheme design respond sensitively to that significance.'
- **Fareham Borough Council** request to be consulted on any future proposals for the site given its proximity to Portchester Castle.

A4.23 The following main issues were raised by general and other consultation bodies on PLP11: Port Solent:

- The **Residents Association of Port Solent (RAPS)** consider the policy legally compliant and that it meets the Duty to Co-operate, but consider it to be unsound.
- **RAPS** contend that adding 500 homes by 2040 (and 400 thereafter) will double Port Solent's population and consequently put pressure on the existing infrastructure and local services, such as health, education and employment. They suggest that paragraph A167 should be amended to address how local services will be improved to cope with such demand.
- **RAPS** state that the policy does not acknowledge the ground instability of the site, despite evidence of subsidence and recent issues with existing sewerage infrastructure along Port Way. They indicate that a new paragraph should be added to the supporting text to reflect this.
- **RAPS** argue that paragraph A165 should outline the options for improving emergency access and egress arrangements.
- **PCC Drainage** note that there may be a substantial requirement for additional foul water infrastructure to deliver at development at Port Solent.
- **An individual** states that the proposal to deliver 500 homes at Port Solent, with a further 400 to follow, is unsound. They contend that high rise tower blocks will not be feasible on reclaimed land and as such, any new development would cover the majority of the site boundary. They highlight the policy fails to address how such development may result in a loss of marina facilities that would undermine Port Solent's role and function as a marina. They suggest that Premier Marinas should provide a statement to confirm that they will still be able to operate a functioning marina that does not result in a loss of amenities for boat owners. They say that an increased population would put further strain on key routes, such as Portway access road, which would exacerbate existing traffic congestion issues. They highlight that there is no provision in place for new local services, such as a doctor's surgery, school and convenience store, to accommodate the increased demand that would arise from such population growth.
- **An individual** highlights that the pedestrian walkway over the lock in its current state is not accessible to all and would not be able to cope with additional foot traffic.

PLP11: Port Solent - Council response

How the representations have been taken into account:

- Regarding the representation by the site promoters Premier Marinas Ltd and CBRE IM, it is the Council's opinion that a change to the number of dwellings and/or phasing at this stage of the plan making process is not appropriate as this would be a significant change which has not been subject to consultation. Paragraph A144 of the PLP Addendum 2025 also notes that the quanta of development set under the site allocation policies are indicative and subject to change. Therefore, the Council considers that the policy wording is already worded flexibly to allow more dwellings to come forward. A statement of common ground has been prepared with Premier Marinas Ltd and CBRE IM (dated March 2026) to address the issues they have raised.
- In response to Historic England's representation, a Heritage Statement is required as part of the LPA's validation submission checklist for any proposals that that would affect the setting of a Scheduled Monument, which would apply to Port Solent in the context of Portchester Castle. Therefore, the Council do not consider it necessary to amend paragraph A183.
- The Council will ensure that Fareham Borough Council are consulted through future development proposals for the Port Solent. No changes are considered necessary to the policy.
- The Council considers that concerns raised by RAPS in regard to pressure on existing infrastructure, including foul water infrastructure, and local services are sufficiently addressed through the respective City-wide policies PLP50: Infrastructure Delivery (criterion 1) and PLP32: Sustainable Drainage Systems (criterion 6) of the 2024 Pre-Submission Portsmouth Local Plan. The Infrastructure Delivery Plan (IDP) also sets out the infrastructure that is required to be in place to unlock development on the site. RAPS' concerns in regard to emergency access and egress arrangement details would be addressed through policy PLP31: Flooding. Therefore, the Council does not consider it necessary to make any amendments to the policy.
- The Council considers that the concerns raised by PCC Drainage are sufficiently addressed through criterion 6 of Policy PLP32: Sustainable Drainage Systems of the Portsmouth Pre-Submission Local Plan 2024.
- The Council considers that the concerns raised by a member of the public in regard to traffic congestion, the existing pedestrian walkway and potential loss of amenities/marina facilities are sufficiently addressed through criteria 2.h), I), j) and m) of Policy PLP11. Their comments relating to the need for new local services are also considered to be sufficiently addressed through policy PLP50: Infrastructure Delivery (criterion 1) and supported by the IDP. Therefore, no changes to the policy are considered necessary.
- The Council does not consider it necessary to change the proposed housing numbers for the allocation in response to the point raised by a member of the public regarding the capacity of the site as this can be resolved at the planning application stage.

PLP16: Housing Target

	Number of respondents
Total number of respondents	3
Respondents who raised soundness	3
Respondents who raised legal compliance	2
Respondents who raised Duty to Cooperate	2

A4.24 The following main issues were raised by specific consultation bodies on PLP16: Housing Target:

- **Fareham Borough Council (FBC)** acknowledge the challenges PCC face in seeking to meet the City's housing need calculated under the standard method and confirm that FBC have made provision for 800 homes to meet part of Portsmouth's unmet housing need as referenced in their statement of common ground with PCC.
- **East Hampshire District Council (EHDC)** acknowledge that they did not respond to the previous consultation on the Portsmouth Pre-Submission Local Plan 2024 but highlight that they did sign a statement of common ground with PCC in July 2024. The statement of common ground referred to collaborative work by the Partnership for South Hampshire (PfSH) but EHDC have since withdrawn from membership of PfSH (as of March 2025). The statement of common ground acknowledged the constrained nature of the sub-region, the overall shortfall of housing to meet needs, as well as work that collectively looked at broad areas of search to potentially accommodate some needs. EHDC acknowledge that PCC wrote to EHDC in January 2024 requesting assistance to meet housing needs, but it was agreed that EHDC cannot fully meet the unmet housing needs of PCC. It was further agreed that EHDC will consider the identified unmet needs of PCC (and others) as it continues preparation of its Local Plan, though it currently remains unknown whether EHDC will be able to meet its own housing needs and therefore, due assessment will need to consider to what extent EHDC can meet unmet needs from elsewhere in their Local Plan. Should a surplus of housing capacity be identified, it is envisaged that unmet needs from the South Downs National Park in East Hampshire would be prioritised. More recently (October 2025), together with Havant Borough Council and Gosport Borough Council, PCC requested assistance from EHDC with unmet housing and employment needs.
- **EHDC** note that the housing market relationships with Portsmouth and Havant are confined to their southern parishes of Horndean, Clanfield and Rowlands Castle.
- **EHDC** raise concern that the plan-period does not reflect the NPPF requirement that strategic policies cover a minimum period of 15 years from adoption, therefore, the policy as drafted is unlikely to be consistent with national policy. However, they acknowledge that extending the plan period is only likely to exacerbate the amount of unmet need.
- **EHDC** recognise the development constraints faced by Portsmouth and the efforts made to identify and quantify unmet needs. They support the various sources of housing supply identified in policy PLP16 especially in regard to deliverable and developable HELAA sites, windfall allowance, and future neighbourhood plans. They encourage that these sources are actively monitored throughout the plan period.

A4.25 The following main issues were raised by general and other consultation bodies on PLP16: Housing Target:

- **Home Builders Federation (HBF)** recognise that a stepped housing target is justified for Portsmouth on the basis that there are insufficient sites available and without the step the Council will not have a five year land supply. However, they stress that the Council will need to ensure that it has left no stone unturned with

regard to development in the early years of the plan, and in particular that it has looked to allocate smaller sites that could deliver in the first five years of the plan wherever possible.

- **HBF** agrees with the approach to amending the start date for the plan period to 2025, but raise concern that the end of the plan period is 2040, which will not give 15 years from adoption as required by paragraph 22 of the NPPF. They suggest that this is unsound, and the Plan period needs to be extended by two years to 2041/42 to ensure consistency with national policy.
- **HBF** recognises that PCC is constrained with a tight boundary to its urban edge making it difficult to identify new development opportunities to meet its housing needs in full. Given the shortfall in housing needs, they highlight that the Council will need to be able to fully justify the exclusion of any sites submitted for development and that other opportunities that may present themselves following this consultation or prior to submission are included in the Local Plan.
- **HBF** are pleased to see that 800 homes will be provided in Fareham to address some of Portsmouth's unmet needs, but express disappointment that the remaining unmet needs have not been addressed in neighbouring areas, though they acknowledge that PCC has actively engaged with its neighbours on the issue of unmet housing needs as part of PfSH.
- **HBF** welcome the inclusion within paragraph A199 of the Addendum that the Council has a shortfall of 3,116 homes that must be delivered elsewhere, but they note that over an extended plan period this is less likely to increase.

PLP16: Housing Target - Council response

How the representations have been taken into account:

- No response is required to the issue raised by FBC as they support the policy. A statement of common ground has been prepared with FBC (dated February 2026) which includes matters of agreement regarding housing numbers.
- In response to the concern raised by EHDC and HBF that the plan period does not cover 15 years from adoption, the Council has not extended the plan period as it has taken a pragmatic approach. The end date for the plan period is in line with advice provided by the Planning Inspectorate in August 2025. If the Council had extended the plan period further it would have necessitated further evidence gathering which in turn would have necessitated further delay in plan-making.
- A statement of common ground has been prepared with EHDC to address the issues they have raised (dated February 2026).
- A statement of common ground has been prepared jointly with other authorities of South East Hampshire (Gosport Borough Council, Havant Borough Council, and Fareham Borough Council, dated March 2026) regarding unmet housing needs across the area, amongst other matters.
- In response to the issue raised by the HBF that the Council will need to be able to fully justify the exclusion of any sites submitted for development, the Council presents this in the latest HELAA (2025) and discusses this further in the Housing Background Paper.
- A statement of common ground has been prepared with Gosport Borough Council (dated February 2026) which includes matters of agreement regarding housing numbers. They did not make any representations against this policy via the consultation on the Portsmouth Pre-Submission Local Plan Addendum 2025.
- A statement of common ground has been prepared with Havant Borough Council (dated February 2026) which includes matters of agreement regarding housing numbers. They did not make any representations against this policy via the consultation on the Portsmouth Pre-Submission Local Plan Addendum 2025.
- A statement of common ground has been prepared with South Downs National Park Authority (dated February 2026) which includes matters of agreement regarding housing numbers. They did not make any representations against this policy via the consultation on the Portsmouth Pre-Submission Local Plan Addendum 2025.
- A statement of common ground has been prepared with Winchester City Council (dated February 2026) which includes matters of agreement regarding housing numbers. They did not make any representations against this policy via the consultation on the Portsmouth Pre-Submission Local Plan Addendum 2025.

PLP25: Employment Target

	Number of respondents
Total number of respondents	1
Respondents who raised soundness	1
Respondents who raised legal compliance	1
Respondents who raised Duty to Cooperate	1

A4.26 There were no comments received from specific consultation bodies on PLP25: Employment Target.

A4.27 The following main issues were raised by general and other consultation bodies on PLP25: Employment Target:

- **Langstone Harbour Board** comment that they would like to see Langstone Harbour included as a local asset that Portsmouth benefits from, along with other waterfront sites. They suggest the following amended wording to para A203: 'The City is key to the Solent's growing marine and maritime sector. Portsmouth benefits from the presence of the International Port, and HM Naval Base on the west of the island and Langstone Harbour to the east. The City has ~~and~~ a number of waterfront access sites including Trafalgar Wharf, Port Solent, ~~and~~ The Camber Southsea Marina and the Eastney landing pontoon. Portsmouth City Council is one of the City's major employers alongside the Naval Base, the University of Portsmouth, Airbus Defence and Space, BAE Systems and Pall Europe. Lakeside North Harbour Business Park in Cosham offers a premier office, research and development space, which draws businesses from across the sub-region, while the City's well-occupied industrial estates in Hilsea support a range of sectors.'

PLP25: Employment Target - Council response

How the representations have been taken into account:

- In response to comments from Langstone Harbour Board, the Council has proposed amendments to para A203 in the Schedule of Changes to the Pre-Submission Portsmouth Local Plan Addendum 2025.
- A statement of common ground has been prepared with Fareham Borough Council (dated February 2026) which includes matters of agreement regarding employment. They did not make any representations against this policy via the consultation on the Portsmouth Pre-Submission Local Plan Addendum 2025.
- A statement of common ground has been prepared with Gosport Borough Council (dated February 2026) which includes matters of agreement regarding employment. They did not make any representations against this policy via the consultation on the Portsmouth Pre-Submission Local Plan Addendum 2025.
- A statement of common ground has been prepared with Havant Borough Council (dated February 2026) which includes matters of agreement regarding employment. They did not make any representations against this policy via the consultation on the Portsmouth Pre-Submission Local Plan Addendum 2025.
- A statement of common ground has been prepared with South Downs National Park Authority (dated February 2026) which includes matters of agreement regarding employment. They did not make any representations against this policy via the consultation on the Portsmouth Pre-Submission Local Plan Addendum 2025.
- A statement of common ground has been prepared with Winchester City Council (dated February 2026) which includes matters of agreement regarding employment. They did not make any representations against this policy via the consultation on the Portsmouth Pre-Submission Local Plan Addendum 2025.
- A statement of common ground has been prepared jointly with other authorities of South East Hampshire (Gosport Borough Council, Havant Borough Council and Fareham Borough Council) (dated March 2026) regarding employment needs across the area, amongst other matters.

Chapter 12: Monitoring

	Number of respondents
Total number of respondents	0
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A4.28 No comments were received regarding Chapter 12: Monitoring.

Chapter 12: Monitoring - Council response

How the representations have been taken into account:

- No comments were made on Chapter 12: Monitoring.

Appendix 2: Deliverable and Developable sites from the 2025 Housing & Economic Land Availability Assessment (HELAA) (excluding strategic sites and allocations)

	Number of respondents
Total number of respondents	0
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A4.29 No comments were received regarding Appendix 2: Deliverable and Developable sites from the 2025 HELAA.

Appendix 2: Deliverable and Developable sites from the 2025 HELAA (excluding strategic sites and allocations) - Council response

How the representations have been taken into account:

- No comments were made on Appendix 2: Deliverable and Developable sites from the 2025 HELAA.

Appendix 3: Housing Trajectory

	Number of respondents
Total number of respondents	1
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A4.30 There were no comments received from raised by specific consultation bodies on Appendix 3: Housing Trajectory.

A4.31 The following main issues were raised by general and other consultation bodies on Appendix 3: Housing Trajectory:

- **HBF** welcomes the inclusion of a full housing trajectory within the Local Plan, saying this is consistent with paragraph 78 of the NPPF providing the necessary transparency as to when sites will come forward and the rate at which they will deliver new homes.

Appendix 3: Housing Trajectory - Council response
How the representations have been taken into account: • No response is required as the only comment on Appendix 3 was positive.

Policies Map

	Number of respondents
Total number of respondents	0
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A4.32 No comments were received regarding the Policies Map.

Policies Map - Council response
How the representations have been taken into account: • No comments were made on the Policies Map.

Habitats Regulations Assessment

	Number of respondents
Total number of respondents	4
Respondents who raised soundness	3
Respondents who raised legal compliance	3
Respondents who raised Duty to Cooperate	2

A4.33 The following main issues were raised by specific consultation bodies on the Habitats Regulations Assessment (HRA):

- **Natural England** supports the updated plan-level nutrient budget set out in the HRA.

A4.34 The following main issues were raised by general and other consultation bodies on the HRA:

- **PCC Drainage** highlights that section 5.40 of the HRA omits mention of Farlington Marshes Gutter. They note that HIWWT may have undertaken land management, installing shingle banks in some of the ponds along the east side of Farlington Marsh for bird breeding purposes and PCC should check with HIWWT if this is the case.

- **PCC Drainage** states that section 4 of the HRA on water quality assessment omits consideration of SuDS, which may improve runoff quality, reduce sewer flows, and lower the risk of sewage spills and eutrophication.
- **PCC Drainage** state that paragraph 4.55 of the HRA refers to South East Water supplying water in the north east of the City without specifying its location, creating ambiguity in the assessment.

- The **RSPB** states that the policy's Recreational Pressure Impact Assessment in the HRA focuses only on how the Horsea Island Strategic Open Space allocation could reduce recreational pressures on SPAs and Ramsar sites without exploring measures to avoid impacts on core support areas within the allocation. They add that the policy rules out indirect recreational impacts to Horsea Island SWBGS sites by stating 'little to no potential for the Local Plan to result in recreational disturbance in these sites' (paragraph 6.67), which they ascertain conflicts with draft Local Plan policy proposals for Horsea Island which promotes recreational use of the site.

- The **RSPB** considers that the HRA only appears to consider the role of the Horsea Island Strategic Open Space allocation in reducing recreational pressures on the SPAs and Ramsar sites, but not how this can be achieved without affecting the Core/Primary Support Areas within the allocation site itself.

- The **RSPB** indicate that the HRA focuses on reducing the future recreational burden on wider supporting habitat parcels around the City, whilst not focusing upon those on the site itself.

- The **RSPB** state that the HRA fails to identify potential disturbance impacts from construction and operation of the proposed bridge link landfall to Tipner West, which lies within a core area for waders and brent geese sensitive to disturbance. Disturbance Impact Assessment may therefore require further consideration of how construction and operational activities could affect these species.

- The **RSPB** argue that the City Council should secure suitable replacement habitat for Tipner Range SPA/Ramsar supporting habitat lost through draft Local Plan policies at the earliest opportunity.
- **An individual** highlights that the survey methodology focused exclusively on birds at Tipner West. This narrow scope may omit other species and habitat considerations necessary for a comprehensive HRA.
- **An individual** states that the HRA may not have fully identified hexapods, spiders, lizards and birds of prey at Tipner Firing Range, though these species could be protected under the Wildlife and Countryside Act 1981.

Habitats Regulations Assessment - Council response

How the representations have been taken into account:

- The Council welcomes Natural England's support of the Nutrient Budget. A statement of common ground has been prepared with Natural England (dated February 2026) to address the issues they have raised.
- In response to PCC Drainage comments the following amendments to the HRA are proposed: addition of further reference to SUDs in section 4; removal of reference to South East Water supplying part of the northeast of the city (paragraphs 1.14, 6.124 and 6.125); addition of reference to the Farlington Marshes Gutter into the HRA (paragraph 5.40). No change is required regarding the shingle banks as HIWWT have been consulted on the Local Plan and have not raised an issue with this.
- In response to RSPB's comments in respect of how recreational pressure and the impact upon supporting habitat at Horsea Island has been addressed in the HRA, it is proposed that wording in the HRA is strengthened at paragraphs 6.38 and new paragraphs 6.42, 6.68, 6.69 and 6.70 are added to the HRA.
- In response to RSPB's comments in respect of provision of suitable replacement habitat for the Tipner Range SPA/Ramsar, the Council consider that this is detail that can be provided at the project level.
- A statement of common ground has been prepared jointly with the RSPB and HIWWT (dated February 2026) to address the issues they have raised.
- In response to the comment from an individual regarding the focus on birds at Tipner West, the Council considers that the HRA fully considers all of the Local Plan policies and proposals, not just those at Tipner West.

Sustainability Appraisal

	Number of respondents
Total number of respondents	2
Respondents who raised soundness	0
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A4.35 The following main issues were raised by specific consultation bodies on the Sustainability Appraisal (SA):

- **NHS Hampshire and Isle of Wight Integrated Care Board (NHS Hampshire and Isle of Wight ICB)** comments that whilst the SA provides a thorough appraisal of housing, employment, transport and environmental considerations, they are concerned that primary healthcare capacity, particularly GP surgery provision, has not been adequately addressed. They say that this omission is significant given the scale of growth proposed in the Local Plan. They indicate that the SA does not assess the implications of housing growth on primary care infrastructure nor reference mitigation measures to address existing capacity constraints.
- **NHS Hampshire and Isle of Wight ICB** flag that current evidence indicates that Portsmouth already faces insufficient GP surgery capacity, with all practices, except two surgeries, operating beyond their limits. They suggest this concern is reinforced by the SA framework which includes SA6: To promote health communities, asking whether development will "improve access to health community facilities and other services." Despite this, they conclude that the SA does not meaningfully address GP

provision or the cumulative impact of housing growth on healthcare services. They suggest that the SA be updated to: acknowledge the current shortfall in GP capacity across Portsmouth and the potential impact of proposed housing growth; assess the cumulative effect of new development on primary care services, identifying risks to health outcomes; and set out mitigation measures such as requiring developer contributions for new or expanded GP facilities, co-ordinating with NHS H&IOW ICB to align housing growth with health infrastructure planning, and including health infrastructure as a key component in site-specific policies for strategic sites.

- **PCC Lead Local Flood Authority (PCC LLFA)** comment that the SA should include surface water and SuDS elements and how they can be used to tackle climate change and reduce flooding. They also suggest that SA9 can look at how SuDS can be used to enhance the natural environment e.g. raingardens/ tree pits.

A4.36 No comments were received from general or other consultation bodies on the Sustainability Appraisal.

Sustainability Appraisal - Council response

How the representations have been taken into account:

- Responses relating to the SA are addressed by the consultants who prepared the SA (Aecom) in Table 1 of the SA Submission Statement (2026).[1]
- The comment from NHS Hampshire and Isle of Wight ICB repeats their comment on the whole Local Plan made in their response to the Portsmouth Pre-Submission Local Plan 2024, to which the Council's response was that discussions with the H&IOW ICB are ongoing in relating to submissions for CIL funding for healthcare premises. Engagement on how future GP premises need to deliver Local Plan growth is set out in the Interim Infrastructure Delivery Plan. However, reference to a lack of GP surgeries has been added to the baseline information section of the SA Report (Submission version).
- In response to the comments from PCC LLFA, reference to surface water and SuDS and how they can be used to tackle climate change and reduce flooding has been added to the SA, particularly in relation to assessment against objective SA9.

[1] https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/Portsmouth-Local-Plan-SA-Submission-Statement_Feb-2026_final.pdf

Evidence Based Studies

	Number of respondents
Total number of respondents	5
Respondents who raised soundness	1
Respondents who raised legal compliance	0
Respondents who raised Duty to Cooperate	0

A4.37 The following main issues were raised by specific, general and other consultation bodies on Evidence Based Studies:

Housing and Economic Land Availability Assessment (HELAA)

- **Sustainable Conservation Trust** comments that within the HELAA, demolition of existing buildings, particularly on Council-owned sites, is treated as an assumed or default pre-development condition, without evidence that alternative, lower-carbon or heritage sensitive approaches have been considered which has implications for the soundness of policies PLP2, PLP3, PLP16, PLP11 and PLP35. They suggest that the omission of retrofit-first analysis and whole-life carbon evaluation means the Plan is not justified, effective and not consistent with national policy. They list Council-owned sites in the HELAA where buildings have already been demolished, or permission granted to be demolished (Horatia House, Leamington House, and Gibson Centre - Somers Orchard). They also list sites where demolition is implied or required (ST01 City Records Office, CD07 Bridge Centre, Fratton, CD36 & CD37 Arundel Street parcels, and PA01 Port Solent where redevelopment is achievable only through clearance). They request that the HELAA is modified to include a whole-life carbon assessment for each site where demolition is proposed or implied, and to amend the HELAA methodology to incorporate retrofit-potential scoring and embodied-carbon impact.

Infrastructure Delivery Plan (IDP)

- **HCC** request further information on how the Tipner Bridge will be delivered in the timeline of the Local Plan. They raise that uncertainty around delivery of the bridge may delay the South-East Hampshire Rapid Transit Network (SEHRT) to the north and its cross-boundary connections. HCC notes the bridge's delivery plays a fundamental role in promoting active travel and public transport links between Hampshire and Portsmouth.

Interim Duty to Cooperate Statement

- **Winchester City Council** state that the figures in the Interim Duty to Cooperate Statement need to be updated to reflect a contribution from WCC to PCC of 150 dwellings rather than 87, and an unmet needs allowance for WCC of 495 instead of 290.

Interim Strategic Transport Assessment Addendum (ISTAA)

- **Hampshire County Council (HCC)** comment that the ISTAA does not state if the wider impact of the local plan development beyond the PCC boundary has been examined. HCC request clarification on what has been scoped into the assessment.

Evidence Based Studies - Council response

How the representations have been taken into account:

- In response to comments from the Sustainable Conservation Trust regarding the HELAA, the Council notes that demolition is referenced in numerous places in the HELAA. However, the HELAA does not insinuate demolition is required, as landowners are always open to develop a site as they see fit, including by retrofitting existing buildings. However, it is inevitable that on some sites, the buildings will no longer be fit for purpose, or have structural issues which require demolition, as was the case at Horatia and Leamington Houses, where there were significant problems with the concrete structures leading to them needing to be demolished. The HELAA is a high-level evidence base document, and as such the Council does not consider that it would be appropriate or necessary to go into detail to incorporate retrofit potential scoring.
- In response to the comments from HCC regarding the IDP, funding for the Tipner bridge has not yet been secured. The Council will continue to work in partnership with HCC to secure delivery of the bridge.
- In response to HCC and WCC's comments regarding the Interim Duty to Cooperate Statement, the Council will include the most up to date figures in respect of Winchester City Council's unmet need in the final version of the Statement. A statement of common ground has been prepared with WCC (dated February 2026) to address the issues they have raised.
- In response to HCC's comments in respect of the Strategic Transport Assessment, the Assessment is based on the Solent Transport Model. The impact on the wider Strategic Road Network is considered through the Assessment.
- A statement of common ground has been prepared with National Highways (dated March 2026), which includes reference to the Strategic Transport Assessment and Infrastructure Delivery Plan. They did not make any representations on the Portsmouth Pre-Submission Local Plan Addendum 2025.

Appendix 5: Statements of Common Ground (listed alphabetically)

Bellway and Homes and Communities Agency (promoters of Tipner East):

- 'Statement of Common Ground Portsmouth City Council, Bellway & Homes and Communities Agency (trading as 'Homes England') in respect of Land Off Twyford Avenue and Tipner Lane, Portsmouth as part of the Tipner East Strategic Site', September 2024[1]

City and Regional Ltd (promoters of The News Centre, Hilsea - northern parcel)

- 'Statement of Common Ground between Portsmouth City Council & City & Regional Ltd in respect of the News Centre, Hilsea, Portsmouth (Northern Parcel) as part of The News Centre Site Allocation in the Pre-Submission Portsmouth Local Plan 2024', November 2025[2]

Defence Infrastructure Organisation (DIO) (for MoD):

- 'Statement of Common Ground Portsmouth City Council & Defence Infrastructure Organisation (DIO) in respect of the Pre-Submission Portsmouth Local Plan Strategic Site Allocation policies PLP3 (Tipner West and Horsea Island East), PLP6 (Portsmouth City Centre) and PLP9 (Horsea Island Open Space)', December 2024[3]
- 'Statement of Common Ground Portsmouth City Council & Defence Infrastructure Organisation (DIO) in respect of the Pre-Submission Portsmouth Local Plan Addendum Strategic Site Allocation policies PLP3 (Tipner West), PLP6 (Portsmouth City Centre), PLP9 (Horsea Island Strategic Open Space) and PLP11 (Port Solent)', January 2026[4]

December 2024 statement of common ground (SCG) superseded by January 2026 SCG.

East Hampshire District Council:

- 'Statement of Common Ground Portsmouth City Council & East Hampshire District Council', July 2024[5]
- 'Statement of Common Ground Portsmouth City Council & East Hampshire District Council', February 2026[6]

July 2024 SCG superseded by February 2026 SCG.

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[1] https://www.portsmouth.gov.uk/wp-content/uploads/2024/12/Bellway-Homes-England_Tipner-East-SOCG-September24-FINAL.pdf
[2] https://www.portsmouth.gov.uk/wp-content/uploads/2026/01/FINAL_SCG_PCC_City-Regional-Ltd_signed_redacted.pdf
[3] https://www.portsmouth.gov.uk/wp-content/uploads/2024/12/PCC_DIO_SCG_DefenceSites_VFINAL_SIGNED.pdf
[4] https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/PCC-DIO-SCG-DefenceSites_v.FINAL-SIGNED.pdf
[5] https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/Statement-of-Common-Ground-EHDC-PCC-July-2024.pdf
[6] https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/Feb-26-SCG-with-EHDC-Final.pdf

Environment Agency:

- 'Statement of Common Ground Portsmouth City Council as Local Planning Authority & Environment Agency', October 2024[7]
- 'Statement of Common Ground Portsmouth City Council as Local Planning Authority & the Environment Agency', February 2026[8]

October 2024 SCG superseded by February 2026 SCG.

Fareham Borough Council:

- 'Statement of Common Ground Portsmouth City Council & Fareham Borough Council', July 2024[9]
- 'Statement of Common Ground Portsmouth City Council & Fareham Borough Council', February 2026[10]

July 2024 SCG superseded by February 2026 SCG.

FRG Properties Limited (promoters for 194-198 Commercial Road, Portsmouth City Centre):

- 'Statement of Common Ground between Portsmouth City Council & FRG Properties Limited in respect to 194-198 Commercial Road, Portsmouth, PO1 1HB as part of the Portsmouth City Centre Strategic Site', March 2026[11]

Gosport Borough Council:

- 'Statement of Common Ground Portsmouth City Council & Gosport Borough Council', July 2024[12]
- 'Statement of Common Ground Portsmouth City Council & Gosport Borough Council', February 2026[13]

July 2024 SCG superseded by February 2026 SCG.

Havant Borough Council:

- 'Statement of Comon Ground Portsmouth City Council & Havant Borough Council', July 2024[14]

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[7] https://www.portsmouth.gov.uk/wp-content/uploads/2024/12/EA-Statement-of-Common-Ground-Nov-2024v.2.pdf
[8] https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/EA_SCG_Feb26.pdf
[9] https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/June-24-Statement-of-Common-Ground-FBC-PCC-v1-Signed-FINAL.pdf
[10] https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/Feb-26-SCG-with-FBC-Final-signed.pdf
[11] https://www.portsmouth.gov.uk/wp-content/uploads/2026/03/Statement-of-Common-Ground-194-198-Commercial-Road-FINAL-VERSION_REDACTED.pdf
[12] https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/Statement-of-Common-Ground-GBC-PCC-July-2024.pdf
[13] https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/FINAL_SCG_PCC_GBC_Feb-26.pdf
[14] https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/Statement-of-Common-Ground-HBC-PCC-July-2024-HBC-signedFINAL.pdf

- 'Statement of Common Ground Portsmouth City Council & Havant Borough Council', February 2026[15]

July 2024 SCG superseded by February 2026 SCG.

Heritage Property Southern Limited (promoters of Land West of Portsdown Technology Park):

- 'Statement of Common Ground Portsmouth City Council & Heritage Property Southern Limited', September 2024[16]
- 'Statement of Common Ground Portsmouth City Council & Heritage Property Southern Limited', August 2025[17]

September 2024 SCG superseded by August 2025 SCG.

Historic England:

- 'Statement of Common Ground Portsmouth City Council & Historic England', 2025[18]

Homes England (promoters of St James' Hospital element of St James' and Langstone Campus):

- 'Statement of Common Ground Portsmouth City Council & Homes England in respect to land south east of St James' Hospital as part of the St James' and Langstone Campus Strategic Site', June 2024[19]

Isle of Wight Council (IOWC):

- Statement of Common Ground Portsmouth City Council & Isle of Wight Council', July 2024[20]

James Brothers, Wellingborough Limited:

- 'Statement of Common Ground Portsmouth City Council & James Brothers, Wellingborough Limited in respect to 200-204 Commercial Road, Portsmouth, PO1 1HB as part of Portsmouth City Centre Strategic Site, May 2024[21]

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[15] https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/Final_SCG_HBC_PCC_Feb-26_SIGNED.pdf
[16] https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Land-_West_of_Portsdown_Technology_Park_SCG_September-2024-Final_Signed.pdf
[17] https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Signed_Land-_West_of_Portsdown_Technology_Park_SCG_August_2025.pdf
[18] https://www.portsmouth.gov.uk/wp-content/uploads/2025/02/SGC-between-HE-and-PCC_final-version-with-appendices-for-publication_Redacted.pdf
[19] https://www.portsmouth.gov.uk/wp-content/uploads/2024/09/Statement-of-Common-Ground_Homes-England-Final_signed_Redacted-1.pdf
[20] https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/IWC-PCC-IPS-Statement-of-Common-Ground-June-2024.pdf
[21] https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/200-204-Commercial-Road-SOCG-May-24-FINAL.pdf

Marine Management Organisation:

- 'Statement of Common Ground Portsmouth City Council as Local Planning Authority & Marine Management Organisation', December 2024[22]
- 'Statement of Common Ground Portsmouth City Council as Local Planning Authority & Marine Management Organisation', February 2026[23]

December 2024 SCG superseded by February 2026 SCG.

Milton Neighbourhood Forum:

- 'Statement of Common Ground Portsmouth City Council & Milton Neighbourhood Forum', August 2024[24]

National Highways:

- 'Statement of Common Ground Portsmouth City Council & National Highways', February 2025[25]
- 'Statement of Common Ground Portsmouth City Council & National Highways', March 2026[26]

February 2025 SCG superseded by March 2026 SCG.

Natural England:

- 'Statement of Common Ground Portsmouth City Council as Local Planning Authority & Natural England', February 2026[27]

Network Rail:

- 'Statement of Common Ground Portsmouth City Council & Network Rail', November 2024[28]

Orangestar Capital (Portsmouth) Ltd (landowner of Fraser Range, represented by Pearce Planning Limited):

- 'Statement of Common Ground Portsmouth City Council & Pearce Planning Ltd (on behalf of Orangestar Capital (Portsmouth) Ltd) in respect of Fraser Range, Fort Cumberland Road, Southsea', January 2025[29]

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[22] https://www.portsmouth.gov.uk/wp-content/uploads/2024/12/MMO-Statement-of-Common-Ground-Dec-2024v.Dec-FINAL.pdf
[23] https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/Feb-26-SCG_MMO_LP-Addendum_FINAL.pdf
[24] https://www.portsmouth.gov.uk/wp-content/uploads/2024/09/Final-Signed-SOCG-September-2024-with-appendicies.pdf
[25] https://www.portsmouth.gov.uk/wp-content/uploads/2025/02/National-Highways-SoCG-21.02.25-Signed-signed.pdf
[26] https://www.portsmouth.gov.uk/wp-content/uploads/2026/03/National-Highways-SoCG-March-26-final.pdf
[27] https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/PCC-NE-SoCG-Feb-26.pdf
[28] https://www.portsmouth.gov.uk/wp-content/uploads/2025/01/Network-Rail-SoCG-November-2024.pdf
[29] https://www.portsmouth.gov.uk/wp-content/uploads/2025/02/SCG_Fraser_Range_January_2025_signed.pdf

PCC Children, Families and Education:

- 'Statement of Agreement Portsmouth City Council Local Planning Authority & Portsmouth City Council Children, Families and Education Directorate relating to the Portsmouth Local Plan & the Infrastructure Delivery Plan', July 2024[30]

PCC Local Highway Authority (LHA):

- 'Statement of Common Ground Portsmouth City Council as the Local Planning Authority & Portsmouth City Council as the Local Highways Authority', November 2024[31]

PCC Promoter (Tipner West):

- 'Statement of Comon Ground Portsmouth City Council (Local Planning Authority) & Portsmouth City Council (Promoter) in respect of Tipner West (Policy PLP3) Pre-Submission Portsmouth Local Plan Addendum 2025', March 2026[32]

PCC Promoter, Landowner, and PCC Transport (Tipner East):

- 'Statement of Common Ground Portsmouth City Council as Local Planning Authority & Portsmouth City Council Transport as landowner and site promoter in respect to Tipner Interchange, Tipner Lane, Portsmouth PO2 8AN as part of the Tipner East Strategic Site', November 2024[33]

PCC Promoter (City Centre North):

- 'Statement of Common Ground Portsmouth City Council & PCC Representative Developer and Landowner in respect to City Centre North as part of Portsmouth City Centre Strategic Site', August 2024[34]
- 'Statement of Comon Ground between Portsmouth City Council as Local Planning Authority & Portsmouth City Council as Site Promoter in respect to City Centre North, as part of the Portsmouth City Centre Strategic Site', March 2026[35]

August 2024 SCG superseded by March 2026 SCG.

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[30] https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/Statement-of-Agreement_IDP_Education_accessible.pdf
[31] https://www.portsmouth.gov.uk/wp-content/uploads/2024/11/Statement-of-Common-Ground-PCC_LHA-Nov-2024.pdf
[32] https://www.portsmouth.gov.uk/wp-content/uploads/2026/03/PCC_Promoter-Local-Plan-Addendum-Feb-2026-SCG-v2FINAL-with-Delivery-Approach.pdf
[33] https://www.portsmouth.gov.uk/wp-content/uploads/2024/11/SCG_PCC_PCC_Transport_Tipner-East_Nov_2024.pdf
[34] https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/City-Centre-North-Statement-of-Common-Ground-Signed-August-24-FINAL.docx.pdf
[35] https://www.portsmouth.gov.uk/wp-content/uploads/2026/03/SCG-CCN-FINAL-inc.-appendices_Redacted.pdf

PCC Promoter (56 Arundel Street - Shopmobility, Portsmouth City Centre)

- 'Statement of Common Ground between Portsmouth City Council as Local Planning Authority & Portsmouth City Council as Site Promoter', March 2026[36]

PCC Promoter (Lakeside North Harbour):

- 'Statement of Common Ground Portsmouth City Council Local Planning Authority & Portsmouth City Council Property in respect to Lakeside North Harbour, Western Rd, Portsmouth PO6 3EN', August 2024[37]

PCC Promoter (Somers Orchard):

- 'Statement of Common Ground Portsmouth City Council & Portsmouth City Council, Housing Revenue Account in respect to Somers Orchard, Wiltshire Street, Portsmouth PO5 4DE', June 2024[38]
- 'Statement of Common Ground between Portsmouth City Council Local Planning Authority & Portsmouth City Council Housing Revenue Account', March 2026[39]

June 2024 SCG superseded by March 2026 SCG.

PCC Public Health:

- 'Statement of Common Ground Portsmouth City Council (LPA) & Portsmouth City Council (Public Health)', February 2025[40]

Portsmouth Football Club (Fratton Park):

- 'Statement of Common Ground Portsmouth City Council & Portsmouth Football Club in respect to Fratton Park and adjacent land as part of the Fratton Park and the Pompey Centre Strategic Site', October 2024[41]
- 'Statement of Common Ground between Portsmouth City Council & Portsmouth Football Club in respect to Fratton Park and adjacent land, Portsmouth', August 2025[42]

October 2024 SCG superseded by August 2025 SCG.

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[36] https://www.portsmouth.gov.uk/wp-content/uploads/2026/03/Site-Allocations-SCG-Arundel-Street-Shopmobility_INC-APPENDIX_FINAL.pdf
[37] https://www.portsmouth.gov.uk/wp-content/uploads/2024/09/Final_SCG-Lakeside_August_2024_signed.pdf
[38] https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Somers-Orchard-SOCG-August-24-MW-Signed-FINAL.pdf
[39] https://www.portsmouth.gov.uk/wp-content/uploads/2026/03/SCG-Somers-Orchard-inc.-appendices_Redacted_FINAL.pdf
[40] https://www.portsmouth.gov.uk/wp-content/uploads/2025/02/Final-SCG-Public-Health-March-25-signed.pdf
[41] https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Statement-of-Common-Ground_PFC_October_2024_Final-Redacted-1.pdf
[42] https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Signed-Statement-of-Common-Ground-180925.pdf

PJ Livesey (site promoter of St James' Hospital element of St James' and Langstone Campus):

- 'Statement of Common Ground Portsmouth City Council & PJ Livesey in respect to St James' Hospital as part of the St James' and Langstone Campus Strategic Site', June 2024[43]

Premier Marinas (represented by CBRE) (promoter of Port Solent)

- 'Statement of Common Ground between Portsmouth City Council, Premier Marinas Limited & USF Nominees Ltd c/o CBREIM in respect to the Port Solent Site Allocation', October 2024[44]
- 'Statement of Common Ground between Portsmouth City Council, Premier Marinas Limited & CBRE Investment Management (CBRE IM) in respect to the Port Solent Site Allocation', March 2026[45]

October 2024 SCG superseded by March 2026 SCG.

RSPB & HIOWWT:

- 'Statement of Common Ground (and Areas of Disagreement) Portsmouth City Council (Local Planning Authority) and jointly the Royal Society for the Protection of Birds (RSPB) and Hampshire and Isle of Wight Wildlife Trust (HIWWT) in respect of the strategic site allocation at: Tipner West & Horsea Island East (Draft Policy PLP3) Pre-Submission Portsmouth Local Plan', February 2025[46]
- 'Statement of Common Ground (including Areas of Disagreement) Portsmouth City Council as Local Planning Authority & Royal Society for the Protection of Birds (RSPB) & Hampshire and Isle of Wight Wildlife Trust (HIWWT)', February 2026[47]

February 2025 SCG superseded by February 2026 SCG.

Slindon Street Portsmouth Ltd (promoters of Portsmouth Mail Centre, Portsmouth City Centre):

- 'Statement of Comon Ground Portsmouth City Council & Slindon Street Portsmouth Ltd in respect to Portsmouth Mail Centre, Slindon Street, Portsmouth, PO1 1AB as part of Portsmouth City Centre Strategic Site', March 2024[48]

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[43] https://www.portsmouth.gov.uk/wp-content/uploads/2024/09/Statement-of-Common-Ground_PJ-Livesey-Final-Signed_Redacted-1.pdf
[44] https://www.portsmouth.gov.uk/wp-content/uploads/2024/12/Final_Port_Solent_SCG_Premier_Marinas_USF_Nominees_Ltd_CBREIM_redacted.pdf
[45] https://www.portsmouth.gov.uk/wp-content/uploads/2026/03/SCG-Port-Solent_FINAL_REDACTED.pdf
[46] https://www.portsmouth.gov.uk/wp-content/uploads/2025/02/SCG-RSPB-HIWWT-Tipner-West-PLP3-vFINAL-21Feb2025-SIGNED.pdf
[47] https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/RSPB-HIWWT-SCG-Addendum-PolicyPLP3-and-PLP9-FINAL-vSIGNED.-Feb2026.pdf
[48] https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Portsmouth-Mail-Centre-Statement-of-common-Ground-Final-Draft-3-004-FINAL.pdf

South East Hampshire (PCC, GBC, HBC, FBC):

- 'Statement of Common Ground between the South East Hampshire Local Authorities of Fareham Borough Council, Gosport Borough Council, Havant Borough Council and Portsmouth City Council', March 2026[49]

South Downs National Park Authority:

- 'Statement of Common Ground Portsmouth City Council & South Downs National Park Authority', February 2026[50]

Southern Water:

- 'Statement of Common Ground Portsmouth City Council & Southern Water', September 2024[51]

Southsea Village Limited (promoter of former St John's College):

- 'Statement of Common Ground Portsmouth City Council & Southsea Village Limited in respect of Former St John's College, Grove Road South, Portsmouth, PO5 3QW', August 2024[52]

Sport England:

- 'Statement of Common Ground Portsmouth City Council & Sport England', February 2025[53]

University of Portsmouth (promoter of Langstone Campus part of St James' and Langstone Campus allocation):

- 'Statement of Common Ground Portsmouth City Council & University of Portsmouth in respect to Langstone Campus as part of the St James' and Langstone Campus Strategic Site', October 2024[54]

Winchester City Council:

- 'Statement of Common Ground between Winchester City Council and Portsmouth City Council', August 2024[55]

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[49] https://www.portsmouth.gov.uk/wp-content/uploads/2026/03/Final_SCG_SEH_Mar-26.pdf
[50] https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/Final_SCG_SDNPA_PCC_Feb-26_Signed.pdf
[51] https://www.portsmouth.gov.uk/wp-content/uploads/2024/09/Statement-of-Common-Ground-PCC_Southern-Water-Septemeber-2024-FINAL-signed.pdf
[52] https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Final_SCG_St_Johns_College_August_2024.pdf
[53] https://www.portsmouth.gov.uk/wp-content/uploads/2025/02/SOCH-PCC-Sport-England-Final-Feb-25.pdf
[54] https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Statement-of-Common-Ground_UOP_Final_Redacted.pdf
[55] https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/Statement-of-Common-Ground-between-Portsmouth-and-Winchester-PCC-signed-August-2024.pdf

- 'Statement of Common Ground between Winchester City Council and Portsmouth City Council', October 2024[56]
- 'Statement of Common Ground Winchester City Council and Portsmouth City Council', February 2026[57]

August 2024 and October 2024 SCGs superseded by February 2026 SCG.

[56] https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Statement-of-Common-Ground-between-Portsmouth-and-Winchester-PCC-updated-October-2024-FINAL.pdf
[57] https://www.portsmouth.gov.uk/wp-content/uploads/2026/02/Final_SCG_PCC_WCC_Feb-26_Signed.pdf