

## **Planning Policy Team Reg'n 19 Consultation**

A test of "Soundness" was a key element in the Milton Neighbourhood Plan (MNP):-

<https://www.portsmouth.gov.uk/wp-content/uploads/2022/10/Milton-Plan-Final-adopted.pdf> and is just as relevant as the test request for the Reg'n 19 Consultation. The difference is that the Milton Plan has a more sympathetic approach to the social and environmental dimensions relevant to its proximity to Langstone Harbour.

The Milton Neighbourhood Forum commented by e-mail under Reg'n 18 in Autumn 2021. We explained how and why from a Milton-centric perspective, the draft Plan conflicted with National Objectives on improving designated habitat sites and air quality, and compromised improvements to health and well-being from losses in open space. See:-

<https://democracy.portsmouth.gov.uk/documents/s37180/Appendix%201%20Draft%20Reg%2018%20consultation%20response%20summary%20report%20v2.pdf>

Our Statement of Common Ground of August 2024 addresses these in respect of the Strategic Allocation for St James' and Langstone Campus under PLP 8.

The MNP was examined post Reg'n 18 and was heavily reliant upon the Portsmouth Plan evidence papers, particularly on Open Space, Green Infrastructure and conservation of designated coastal habitat:-

[https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Green-Infrastructure-background-paper-Sep21\\_compressed.pdf](https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/Green-Infrastructure-background-paper-Sep21_compressed.pdf) and

<https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-open-spaces-assessment.pdf> where the open space deficits of 60% against national standards and other green infrastructure shortfalls are clearly identified.

The MNP is therefore fully compliant with the Strategic Policies on Green Infrastructure PLP38; Biodiversity PLP39; Solent Waders and Brent Geese PLP 42; and Recreational Stress and Disturbance PLP43. The Local Plan draft says under its "Design Vision":- *In 2040 Portsmouth will be a thriving, vibrant City with a strong maritime history, a rich cultural heritage, and an incredible waterfront. Portsmouth will be a City that celebrates its rich cultural and maritime heritage, with a focus on respecting and celebrating the City's historical, environmental, and coastal features. This involves appreciating the City's iconic landmarks and their settings, such as the Guildhall and the Spinnaker Tower, by preserving and enhancing important key views, as well as conserving important environmental features such as Langstone Harbour and Farlington Marshes.*

The Milton Plan tries to do the same. However the housing figure of 13,600 remains a difficult number to accept when the 2021 Census reported a population increase of just 1.4% to 208,000 up from 205,100 in 2011:-

<https://www.ons.gov.uk/visualisations/censusareachanges/E06000044/>

In May 2019 there were 89,800 households in the City:- see para 1.1.7

<https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/207.9-Local-plan-2021-document-FULL-ACCESSIBLE.pdf> up from 79,000 in 2001 (see para 1.18 <https://www.portsmouth.gov.uk/wp-content/uploads/2021/12/Portsmouth-City-Local-Plan-Accessible-except-colours.pdf>) The inability to create any more than 10,800 homes in 18 years hasn't been the LPA's fault:- there just isn't the physical capacity or infrastructure.

There have been no significant highway improvements since the 2001-2011 Local Plan. At p 9 <https://www.portsmouth.gov.uk/wp-content/uploads/2021/12/Portsmouth-City-Local-Plan-Accessible-except-colours.pdf> the aims were to make Portsmouth an accessible City, free of unnecessary traffic with a choice of effective public transport and alternatives to the car, facilitated by LTP1. Objective 2 in the 2012-2027

Plan (see p14) <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/The-Portsmouth-Plan.pdf> was to make Portsmouth an accessible City with sustainable and integrated transport. On the west of the City an improved Hard Interchange (Portsmouth Harbour Railway Station; Bus Terminus; and Gosport Ferry), together with the Tipner Park and Ride offer alternatives to the private car but otherwise, public transport means buses sharing an already congested highway network on the Eastern Corridor. Despite the well-intentioned Transport Plans and strategies, they've made no noticeable difference so that in 2000 there were 622.8 million miles travelled within Portsmouth by cars and taxis and 602.1m in 2023 (up from 460.7m during Covid):- <https://roadtraffic.dft.gov.uk/local-authorities/82> The issue is that we're only 15.5 sq miles in area, and road space for cyclists is extremely limited. The slight downward trend in journeys is more a consequence of the increased tendency/preference of/toward working from home, rather than active transport interventions. Parents remain extremely unlikely to want their children to cycle to school:- the road space just isn't there.

The Transport Strategy:- <https://www.portsmouth.gov.uk/wp-content/uploads/2021/11/74.633-Local-Transport-Plan-2021-Final-Accessible.pdf> is sufficiently laudable but the possibility of achieving them is wildly optimistic. A local image is attached of stationary vehicles in both directions at the Locksway Rd/Milton Rd junction on an ordinary early Spring morning in 2023 outside of the Portsmouth FC season. It illustrates how traffic levels are not going to be remedied through "optimisation" of traffic signaling. If there's no space to move into on a green light, vehicles simply have nowhere to go.

Our concern on the insufficiency of capacity is exacerbated by the allocation of the nearby Fraser Range for 134 homes and 224 car-spaces which will rely upon the road-space in the attached image. In any case, it seems to assume the conditional planning consent for that same number of homes can be complied with. The site wasn't included for residential use at Reg'n 18:- <https://www.portsmouth.gov.uk/wp-content/uploads/2021/09/207.9-Local-plan-2021-document-FULL-ACCESSIBLE.pdf> 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.

There's no evidence that Travel Plans in new developments make sufficient difference to the levels of car-dependency.

The Strategic Environmental Appraisal to the MNP of June 2020 at para 5.4 identified that "Increases in housing, employment and other infrastructure growth proposed though the emerging Local Plan are likely to increase traffic flows and therefore associated levels of pollutants, which are likely to contribute to exceedances of the NAAQO".

PCC's Health & Well-Being Strategy:- <https://www.portsmouth.gov.uk/wp-content/uploads/2022/05/health-and-wellbeing-strategy-january-2022-accessible.pdf> recognises the impacts of poor air on life expectancy but we don't see sufficient linkage between densification of dev't compounded by paucity of open space, with the Healthy City Vision for Portsmouth 2040. The draft Plan ought to have more regard to the City's poorer than average health outcomes. Figure 5 in the ONS Healthy Index Score relative to England 2016-18 in the H & Well-Being strategy shows a sad decline from poor to worse health statistics for the City. The Report says:- *"Exploring sub-domains within the Health Index suggested a number of areas where outcomes are much worse in Portsmouth than in England. These helped to inform the selection of priorities, alongside other outcome data and local intelligence. For example, out of 149 local authorities, where 1 is the best, Portsmouth ranks 98th for child poverty, 112th for household income, 113th for children's social, emotional and mental health, 133rd for GCSE achievement, 135th for air quality, 139th for self-harm, 141st for pupil absence, and 145th for road traffic volume. Many of these areas will have been significantly impacted by Covid-19 and existing disparities are likely to have been exacerbated"*.

The 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.

Although we welcome the proposed reduction in the housing allocation for Strategic Policy PLP 8 from 436 to 417, the lower figure ought to be amended to 208 to account for the 209 new homes already approved since Reg'n 18 and currently under development following the 2023 successful Appeal:- under reference APP/Z1775/W/22/3302931 and APP/Z1775/Y/22/3302927.

The issue also remains, that to achieve the quantum of dev't proposed there is almost certain to be a loss in biodiversity overall. The intensification of usage for recreation has already stressed fragile local wildlife sites. The requirement of the minimum 10% Net Gain on individual dev't sites is meaningless to residents if off-setting, and mitigation means having to deliver biodiversity enhancements elsewhere. Compensation is not enhancement. We don't see that accounted for in the draft Plan:- see below in our comments on PLP39.

The HRA to Reg'n 19 of April 2024 differs from the HRA to the MNP. Both were prepared by AECOM. The Neighbourhood Forum were encouraged to undertake a Neighbourhood Plan by the former MP for Portsmouth North so that we could unite National objectives around habitat "protection" with identified local needs in greater detail than the LPA. It was the LPA's insistence that a second HRA be undertaken which, in April 2020 (see p17), identified that moving new dev't away from Langstone Campus to the Sortsfields to the west of Furze Lane in exchange for open space re-provision on the Campus has significant biodiversity benefits. The benefits to community health would be higher still from integrating the proposed new housing at St James' with new development on the Sports-fields, accessible by foot and cycle only. This potential is frustrated by PLP 8 and para 4.167 (see August 2024 Statement of Common Ground with Milton Neighbourhood Forum).

The proposed increase in open space provision in PLP 45 from 15m<sup>2</sup>/1,000 people on sites of 50 dwellings or more to 16.5m<sup>2</sup>/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.

Similarly, 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. Criteria 4 undermines the objectives of PLP38 and should be deleted.

Biodiversity priorities under PLP 39 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. We recommend the text "*unless exceptional circumstances outweighing the adverse effects are clearly demonstrated*" in para d) ii be deleted.

The single biggest lesson from the Covid Pandemic was that people's health and well-being could be improved through access to open space and nature.

At Reg'n 18, the Coastal Zone Policy S10 identified that "*Portsmouth has a significant length of coastline within its boundaries which brings a range of benefits for the city. The coastline environment will need management to address predicted sea level rise. On the eastern coastline, the intertidal and connected on-shore areas form an integral part of the protected Langstone Harbour environment. This area features some of the city's more extensive areas of open space that help to support roosting and feeding sites for Brent Geese and Waders and the intertidal zone supports a range of species*".

Reg'n 19 Coastal Zone Boundary on the other hand 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.

**To summarise**, there could be many benefits from the draft Plan including:- the City Centre regeneration (PLP6) with its good rail and bus links; Lakeside North (PLP5) as an employment site; and Tipner East (PLP4), as it makes good use of previously developed land. "The Pompey Centre" PLP7 is challenging from a housing allocation perspective, but the proposed off-road pedestrian and cycle route to Fratton Station will provide a very valuable, and environmentally sustainably, active travel alternative.

We think however, that there are significant social and environmental disbenefits from the scale of densification on what's essentially an Island City surrounded by SPAs and lacking green spaces, that **the "soundness" test is not met.**

It's as if repeating past mistakes in *not* having sufficient regard to Portsmouth's physical and geographical constraints in the 2001 and 2012 Local Plans, *will somehow be different this time round.*

Continually undermining the negative impacts on coastal wildlife habitat from increases in population which cannot be adequately remedied through mitigation, is not what's intended in the UK's Environment Plan of 2018. Tipner West Policy PLP3 is environmentally unsound.

Especially for Milton, but also for the Eastern Seaboard generally, there ought to be far more cognisance of the harmful effects of increased housing dev't to people and habitat.