

## 2014 Milton Site Consultation Responses - PART 1 - Residents' Comments

### Infrastructure - General

Proposed development is inappropriate as there is inadequate infrastructure to support such large scale development

Development of this scale will store up social problems for the future that the council will not have the resources to address. We are an Island that CANNOT keep adding people without it affecting the system that is already in place, and the more you add the more it will cost the council over all. Stop looking at the short term effects and look at the long term.

Not against new building but believe that the current proposal is for too many houses and this will have an adverse effect of the local area. There are not enough local services to support the existing population, let alone an increase in population. Understand the need for more houses, but this should not be at the expense of those already living in the area. Infrastructure impacts MUST be considered. Opposed to the scale of development without major improvements to the basic infrastructure.

The extra demands on infrastructure created by close to 500 dwellings will be the equivalent of placing a small village into an already highly populated area.

Whilst it is probably too late to stop development of the St James hospital site and probably also the University Campus at Langstone, can every effort be made to minimise the impact. It would seem very short sighted to allow these developments to go ahead with the current numbers of housing suggested until solutions to these issues have been addressed first.

### Infrastructure - Traffic & Transport

This part of the city has restricted access. Development will lead to more congestion on the roads. It is already a nightmare getting in and out of the city; rush hour travel times area already unacceptable. When there is an accident or a road is closed, or there is a special event on, there is already gridlock. Traffic in the summer season is busy, and in the winter there is the football traffic. The new Tescos will make this worse. More houses will just compound the problem.

The Eastern Road, Locksway Road, Warren Avenue, Moorings Way and the surrounding smaller roads won't be able to cope - it's already terrible; the roads are too narrow for additional traffic; there are already constant traffic jams;

On Street Parking means that the roads are difficult to negotiate, and parked cars slow down the traffic, meaning that it takes a long time to get in or out of these roads. These roads are hugely problematic already, and traffic flows should be reviewed - let alone with additional development

Want some reassurance that plans ensure the roads for these new houses are not just being feed into Moorings Way, Locksway Road and Warren Avenue

Additional traffic / congestion will cause additional traffic hazards; Children playing in the area or going to school and cyclists are particularly at risk. There may be the need for some pelican crossings and / or a crossing Assistant on the Locksway Road crossing.

Portsmouth is already one of the most unsafe places in the south to ride a bicycle due to the congestion and lack of space on the roads.

Road safety - currently already very dangerous turning into Warren Avenue and Locksway Rd due to parked vehicles obstructing views to left and right.

Additional traffic will lead to increased rat running in the roads between Warren Avenue and Locksway Road - (impact on residents; road safety)

Bus access needs to be improved - more buses and later into the evening and extended routes (eg the full length of Eastern Road).

Is this an opportunity to require the developer to fund the re-introduction of public transport to the area?

Hope there will be multiple points of access to the development sites, and that as part of it, Furze Lane would be utilised for Two Way traffic. This would ease the traffic in Warren Ave and Locksway Road.

Opening the bus only route at Furze Lane to become a through route will have a huge impact on local residents who have

<p>been used to living on a quiet street without traffic. People would use this as a rat run between the Eastern Road and Locksway Road.</p> <p>Portsmouth City Council has an active policy of promoting public transport, cycling and walking. Revoking a bus only route back to through traffic would be a direct contradiction of PCC policy.</p> <p>In 1988 planning permission was rejected for the St James' site redevelopment even though it included a link road from the Eastern Road into Moorings Way by Furze Lane. This was refused due to insufficient road systems and junction widths. If the roads and junctions were deemed too small for the increase of traffic even with a new road with the 1980's traffic how can this authority contemplate this site without even a road inspection or major road improvements with the massive increase of vehicles since the 1980's and the hundreds of new properties which have been built in the area since the initial planning request was refused! The traffic jams and increased pollution the development of this site would cause are unacceptable.</p> <p>Would be opposed to any attempt to resurrect the coast road proposals raised and defeated in the 1980s.</p> <p>Any assessment of the traffic and transport in the area should assess increased CO2 emissions, especially with added congestion and destruction of open green spaces, and have a plan to ensure that CO2 neutral (or better) is achieved.</p> <p>All assessments on traffic and transport must include the effects of the new Tesco Store at the Pompey Centre.</p> <p>Drivers currently take no notice of the 20 mph limit. Need better enforcement of the limit along this road.</p> <p>All these extra people and their children will surely increase the current high level of those cycling on the Locksway Road pavements which is not monitored or controlled.</p> <p>Roads will not be able to accommodate construction traffic (heavy digging equipment, lorries and large trucks) Contractual obligations must be obtained from developers to limit the use of construction traffic to within the hours of 9:30am – 2:30pm (say) Monday to Friday.</p> <p>What will be done to ensure the quality of our roads doesn't drop? The roads in Portsmouth are in a poor way, and extra traffic will impact further on the road surface; Locksway Road is an old road which is constantly under repair, being patched up, having pot holes, and one set of road works on top of another. If this plan goes ahead who will over the cost of all the road reconstruction?</p> <p>The argument that Solent Trust want to encourage people not to use cars is ridiculous, people cannot rely on (very expensive) local transport and as jobs are scarce, people may travel longer distances to work, most people will always use their car if they own one.</p> <p>Rat running through residential streets of Locksway Road, Moorings Way, Warren Avenue and Velder Avenue is prevalent. Likely to become worse, particularly if roads are opened up to serve the development.</p> <p>The NHS are claiming some 4000 vehicle movements per day into/out of St James. Residents question these figures. E.g. Survey in Locksway Road appears to have been made during the middle of the day and the people were only there for a few minutes.</p> <p>The NHS attempt to demonstrate that the traffic from the hospital will be reduced when the hospital buildings close, negating the traffic consequences of the new development. Some of the hospital is to remain and some staff will be relocated at St Mary's Hospital, still in Milton. Appreciate that with the closure of the various NHS facilities, staff and patients will not be using the roads but still feel the new residents will by far outnumber these.</p> <p>Much of the current traffic serving the hospital will be throughout the day and not at peak times, which would be the case for a residential housing development where most cars leave to go out in the morning and return in the evening. In addition, the hospital is virtually empty at night and during the weekend.</p> <p>Question whether any measures (speed bumps, one-way systems, parking restrictions, additional roads, attempts to disperse traffic) would be a satisfactory solution given the level of the problem already, even before these developments are added.</p>
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<p><b>Infrastructure - Parking</b></p> <p>Parking - need to make sure there is enough parking in the new development. If there are not enough parking spaces they will have to either park on Locksway Road or in the side roads opposite and these roads already have problems with parking so adding to that is not a viable solution.</p> <p>Previous new developments have not had adequate parking provision, which has led to overspill parking into surrounding streets.</p>
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<p>There must be a requirement that the builders provide off-road parking places for each individual property – permission should not be given for a scheme with insufficient parking. Given that the proposal is for family homes, and from the experience of the local area, this is likely to be 2-3 vehicles per house. As an alternative how about requiring a covenant in the freehold that restricts the number of vehicles the property occupiers can keep in the area?</p>
<p>Where will the parking for the conversion of the Main Hospital Building go?</p>
<p>There is potential for new residents of the proposed developments to have more cars than the allocated spaces within the developments, and over spill in to Locksway Road and surrounding areas. Therefore, consideration should be given to a residents only parking scheme on all residential roads with in the affected area. Potentially using a time limiting system, similar to those around the Campbell Road area in Southsea, with Residents only parking between 5pm and 7pm. This will help ensure that existing local residents can park in the area after working hours. This would also help residents park on evenings when Portsmouth FC play at Fratton Park.</p>
<p>University Playing Fields -Parking: need to consider very carefully the parking facilities for the site. The car parking on the campus is already insufficient. On evenings when the fields are in use by football/netball/hockey teams, the cars already completely congest Locksway Road, Broom Close and the car parks for Langstone Harbour Fishing Association and the Thatched House pub, and the road becomes completely blocked at times. This also restricts access for emergency services and could be fatal.</p> <p>Residents and customers to local business cannot park</p> <p>If the University is to retain the use of the fields (which I think is a good idea for both the University and the community teams) - an ample car parking facility for the fields MUST be provided.</p>
<p>Possible mitigation for parking problems could be to make one side of Locksway Road double yellow lines for its entire length</p>
<p>Simply painting double yellow lines down one side of Locksway Road will not solve the problem. It will ease the flow of traffic, but not alter the AMOUNT of traffic. In fact it will DECREASE the amount of parking that is currently available - therefore making the parking issue considerably worse. It would be impossible to restrict parking on one side of the road; this is a residential area which is already at the point of saturation with vehicles so there would be nowhere to relocate them to.</p>
<p>NHS Property Services are hurriedly moving all the services presently using it, out. I note that many of the services are moving to St Mary's site, where parking is already difficult and expensive as against parking at St James' which, although sometimes difficult to find, is at least free! What arrangements are being made for more and cheaper parking at St Mary's, I wonder?</p>

<p><b>Infrastructure - Schools</b></p>
<p>There will be a lot of pressure on schools - will need more places, and possibly a new school.</p> <p>Schools in the area are already full to capacity, and the city council is already spending a lot of money of extra classrooms etc to make space for existing pupils</p> <p>Does the council have funds to provide another school? Where in the area is there land to build a new school?</p> <p>It could also mean bigger class sizes, which is not good for pupils</p> <p>If children are unable to attend local schools within walking distance then they will be driven to schools further away, again impacting on traffic.</p> <p>This current planning does not take account of any other external impact, such as the proposed family housing development at the St James' site. How then, can it be demonstrated that such housing is sustainable if there are no supporting educational facilities provided?</p> <p>Relocating the harbour school to Cosham is an unnecessary expense to the tax payer - the facility could be bought out for the cost of relocation.</p> <p>The Harbour Schools should not be moved. Not just because of the cost to the tax-payer, but because it would have a detrimental effect on those pupils who need constancy and stability at an important time in their lives.</p> <p>Can the Harbour School in St James grounds be purchased, leased or taken over by Portsmouth City Council?</p> <p>Together with the 191 homes that are currently being built at St Mary's hospital, Milton Cross school will not be able to cope with the children from this area and the proposed houses at St James, as there is nowhere to extend the school.</p>

Would we have a repeat of the Admiral Lord Nelson school that was built to help the population of Milton primarily and that most of the children it was intended for never got a place and so Milton Cross had to be built?

Moorings Way Infant school sits on a relatively large site, for the size of the school. If this site were to be re-developed, it could potentially provide the necessary infant and junior spaces for the additional residents in the area. This would include the additional residents predicted. The current building is all on one level and has extensive grounds. Plenty of room to extend. There is even room for a secondary building. Perhaps a possibility to avoid children being sent across the city to schools that are already struggling with numbers. It would also mean that local people could walk their children to school - not drive them around town increasing the traffic congestion at peak times. Perhaps the developers of the sites could do this building work as part of the overall plan?

### Infrastructure - Other

Portsmouth has a situation where the health service is failing the city which has been well publicised in the media. GP & dental services are already stretched and with no plans for increasing the level of these facilities will decline; QA is also already overstretched - The standards at QA are below satisfactory if you look at their yearly report. There would also be the need for children's clinics and midwife support.

If the current healthcare system cannot cope, how can it with an extra 1000 people added to it?! Provision of increased healthcare services **will** be required and **must** be considered before any further development. The document states that it 'may' be required.

Additional housing will certainly have an impact upon the water and sewerage services provided in the area. The sewage system in Milton will not be able to cope - the combined surface and foul water system already struggles to cope at times of heavy rainfall and has failed in the past; The number of new dwellings will significantly lead to flows into the system, particularly as the development will take place on areas that are currently green;

The local area also has a heavy clay soil, and being at sea level is prone to localised groundwater flooding. Building on such a scale will exacerbate localised groundwater flooding.

Are Sustainable Drainage Systems being considered? Previous developments have a lot of hard surfaces;

Sewage is already often pumped into Langstone Harbour, having an impact on the quality of the harbour, wildlife, smells. Surely this is unacceptable practice, and should not be allowed to continue? How can this current service be deemed to be appropriate and sustainable?

The site is at or close to sea level, does the development increase the risk of flooding, not just the new buildings, but the existing homes?  
The threat of rising sea levels from global warming / climate change must also be considered. Why are houses being considered so close to the sea? This area of Milton was once a flood plain and could well be again.

There will be a need for additional community centres, local shops playgrounds, nursery care, welfare and social workers, police & fire service etc. etc. etc. Many services are stretched already - with additional people they could be crippled?

What about a cinema for entertainment or a swimming pool or a tennis court or a gym for a healthy lifestyle.

There will be the need for local shops too. Provision needs to be made for modern corner shops too which would keep households shopping locally, and give new small businesses the opportunity to serve this enormous development.

The other issue of course is jobs, where are people going to work and how do they get there? Development will not bring in new jobs or industrial outlets, just overpopulation.

Has additional pressure on waste collection be considered?

A few of years ago there were articles in the press about fears that Portsmouth's electricity infrastructure was not able to cope with additional demands when the new aircraft carriers arrive. If this remains unresolved will this massive development create problems. Is there an opportunity to demand that all new properties are built to the highest energy efficiency standards such as apply in Scandinavia, including requiring energy generation capability such as solar panels? – Actually should this not be applied to every new building in the city to protect our stretched infrastructure?

### Health & Social Impacts

The development will have a significant detrimental impact on the quality of life of current residents

We humans should have the same protection that is given to birds and wildlife. We need open space, beauty, trees and

<p>more than anything peace and quiet in order to lead a happy healthy life, our children need these things in order to thrive. Portsmouth is already a very dense island we cannot expand anymore and we cannot build on what little land is left in the city.</p>
<p>Previous developments in the area have brought with them problems of vandalism, increased traffic and pedestrian movements.</p>
<p>Additional traffic will lead to more noise &amp; pollution - a big concern for health;</p> <p>This is already a concern for residents; It is not possible to have the windows to the front of the house open on roads like Locksway Road, Moorings Way and Warren Avenue, due to the noise &amp; pollution from the huge volume of traffic; Curtains require frequent washing to remove the smell and dust caused by traffic.</p> <p>Believe the traffic pollution levels at nearby Velder Avenue exceed ECC levels, the additional traffic this proposal will bring will only increase those levels. The Planning Department should take time to reacquaint themselves with the contents of the Council's Supplementary Planning Document on Air Quality and Air Pollution (March 2006).</p> <p>Of course the simple way of reducing air pollution from traffic lies with having as many trees as possible.</p>
<p>This is a relatively crime free area and one has to ask if that would be under threat at a time when the Police are being cut to an unbelievable number and are pushed to their limit. With an increase of 800-1000 people in this area and potentially a mixed community and fewer places for people to come together and little for young people to get involved in, crime and anti-social behaviour is likely to increase. Policing is already overstretched.</p> <p>Increased crime will damage the reputation of the city as a whole, which is just improving.</p>
<p>Our garden is constantly littered by passersby and the surrounding area is despite being well cared for by the council always full of unsightly detritus</p>
<p>The assessment of planning applications/submissions must include score weightings for quality (not just cost) that include criteria for provision of betterment to the surrounding area and existing residents.</p> <p>Where a development that has an adverse effect on a small group for the perceived greater good, such as large infrastructure projects (e.g. HS2) there is a long established principle that those who gain (developer) compensate those who lose out. What are your plans in this respect?</p>
<p>Milton is an area where many young families live and at the moment, there are times when children are playing on the streets, which I think is lovely. The increase in traffic will make this more dangerous, and will result in children staying indoors.</p>
<p>The Dementia Units will stay within the grounds of the hospital. These people are elderly and sick and I can't see how they can be 'helped' by being surrounded by family homes.</p> <p>Development will cause St James's patients a lot of stress and anxiety. Patients of St James's require facilities like gardens, trees and green spaces to enable some form of normal life.</p>
<p>It is ironic that St James Hospital is a mental health facility and that there is much talk that nature, peace and quiet is salve to a troubled mind and yet it is proposed that this tranquil area with many lovely trees is to be taken away and built on. There is irrefutable evidence that over-development and its consequent overcrowding causes mental health problems. It would be ironic if the disposal of a site initially designated to help mental illness sufferers should directly lead to poor mental health outcomes</p>

<p><b>Character of Milton</b></p>
<p>Milton is a great area to live and we do fear it being changed. Milton has a village feel, which makes the area and attractive place to live. We have a unique community spirit in the area, with very active clubs societies and other community groups, community events. This spirit is being diminished day by day with crazy decisions that seem determined to wipe this out. A massive influx of new people threatens the way of life in the area.</p> <p>The unique character of the Milton area is marked by the availability of communal open space. This character will be lost;</p> <p>The character of Milton in its uniqueness is worth preserving for future generations to enjoy. The development of these sites for homes will lead to the irrevocable change of Milton, for the worse. If you study an aerial view of our City, the density of the already developed area is staggering. What possible good can come from building on the final remaining areas of green space? Please, consider this development very carefully. The decisions you make will impact not only the current residents but the future generations who will be deprived of a beautiful resource.</p>

Parts of the city are a concrete jungle and not places which are desirable to visit, let alone live in. Do not want this for Milton. Remember that Milton was once called Milton Village...not Milton City.
Accept principle of development in Milton - houses are needed all over the city - but the proposed number is too high for the area and will bring problems with it. Please reconsider the amount of houses that is planned for this site and reduce this amount drastically.
Small, unofficial communities have built up around the area of Milton. For example, all in the area who have dogs see at as the perfect area to socialise and exercise. I know this as I walk my own dog routinely over St James which is a beneficial activity after a busy day amongst the bustle of Portsmouth. To go ahead with the plans, the community would struggle to function in a way that it has done for many years.
I think that the vision for Milton should not include further development, but conserving all green spaces we have!
There has been considerable development in Milton in recent years. What remains should be dedicated to public use: recreation, parkland, walking and wildlife study/observation. In fact, the Portsmouth Plan and other adopted policies highlight the importance of such public amenities.
It is of note that in recent years there has been significant development in the Milton area.
It could be suggested that development in the Milton area is out of control. It is clear that Milton has been over developed.

<b>Loss of the St James's Hospital site</b>
The majority of respondents express their anger / sadness / distress at the potential loss of the St James's Site. Some urge the council to do everything in their power to save the site from development.
The area is heavily used by locals. Some exercise their dogs within the boundaries of the proposed developments; some bring their children to play; some run through, some learn to ride their bicycle and some simply pass through to listen to the birds and ponder. The site in its present form is a community resource for all residents of this teeming city. It has unquantifiable but untold benefits for us, encouraging locals to exercise and to improve their mental as well as their physical health.
If you have ever had the chance to walk through St James Hospital grounds you will see it has its own unique environment with beautiful mature trees lining the paths and roads, it provides a safe habitat for wildlife such as foxes, squirrels, bats, birds and a host of smaller animals like frogs and toads that all make it their home.
This is a special place on Portsea Island and quite different from the other open green areas in and around the city. Its like having the countryside on your doorstep. The University of Portsmouth Langstone Campus site also provides a scenic shoreline walk, passing by the playing fields where the student play football or rugby and the Brent geese use to nest and feed.
Not only do these places provide a safe haven for the wildlife, but most of the local residents have always used these areas, taking regular walks and enjoying the peace and tranquillity that they both have to offer.
Dog walkers have always used the St James Hospital grounds and now use it even more so, getting to and from the designated dog walking area in St James green.
This delightful piece of green land is so important not only to people of Milton but also all residents of Portsmouth. It is also important to those with mental health problems in Portsmouth and their Carers. Object to the closing of psychiatric facilities when there are not enough beds for patients already. A fifth of GPs say that they have had a patient come to harm as a result of not being able to get appropriate psychiatric care, and for the people still left on this rapidly shrinking site the loss of peaceful surroundings could have a detrimental effect on their recovery.
The ideal solution is for the site to remain as it is but, having studied the logistics and comments regarding the development, I reluctantly accept that this unlikely to happen.
The parkland around St James hospital gives children a great, safe area to play and explore - its loss would be a great shame.
Redevelopment of the St James' site also means losing a true local landmark. I understand that that the hospital itself is a listed building, but turning it into housing means we will lose a lot of local history. A real shame.
Once the building work goes ahead where will be no turning back the clock - the damage to this beautiful site and the wildlife within it will be irreversible. The environment must be the first concern of any forward thinking city council and must be protected for now and for the future. If the grounds are decimated by development then the unique ecological system that exists will be no more. It is not something that can be toyed with;

<p>Building on St James Hospital grounds would be a huge mistake. Over the years it has always been well loved and respected by residents. It is vital to the area as a haven for peacefulness and animals of all types, it is naturally beautiful and helps reduce noise from all the busy surrounding areas. Despite all of this, its monetary value seems to be all that is seen by people in power, to change it to something that would certainly increase noise, pollution, traffic, and disrupt our environment. As a resident of the area I ask: "Please do not build on St James."</p>
<p>We know the Brent Geese feeding area is protected by law, as are bats and newts, but this does not stop them being relocated. The wildlife living in St James brings great pleasure to many people in the area and a feeling of peace and wellbeing. To lose all this is to lose the heart of Milton itself.</p>
<p>Will this proposed development prevent public access? Many local people walk, cycle or drive through the hospital site each day and enjoy it.</p>
<p>It is like a whole different place there, it's like being in the countryside when you are in the city! Please think about this and the destruction it could cause to us residents and the city of Portsmouth. Leave St James be and let us and future generations enjoy this land now and in the future.</p>
<p>The local residents of Milton have also always used St James Hospital as a public right of way to walk or drive directly through the grounds to Ironbridge Lane and then on to Southsea seafront.</p>
<p>This particular area of Milton is something for Portsmouth City Council to be proud of, so please do think very hard before 'Money Madness' takes over. We need this wonderful green area particularly now for our sanity, as we are all so busy rushing around like people possessed. Life will not slow down so please also think of the children of the future they will need this 'sanctuary'.</p>
<p>The St James site is also a beautiful and well established park; one of the few in Portsmouth. It is a haven for walkers, families and a sanctuary for wildlife. Even London has its glorious parks – so why can't we? Nature is slowly being pushed out of our city, and it is important we preserve what we have for future generations of Portsmouth.</p>
<p>This space, once lost, is lost forever.</p>

<p><b>Impact of the loss of open spaces / nature conservation</b></p>
<p>Open spaces are integral in maintaining a sense of community and very important for children and young people especially.</p>
<p>We are rapidly losing green areas in what is already an incredibly built up city, with a disproportionately high number of flats, so a huge number of people without their own garden.</p> <p>Portsmouth is billed as the Waterfront City... perhaps it should retain some green areas inside its city limits.</p> <p>We need green space it's running out across our great city.</p> <p>How much more Green land is planned to be destroyed? The people I spoke to could not give a definitive answer?</p> <p>In a city with little green space, surely destroying more is against public policy? Certainly the City Plan alludes to protecting the limited green areas that we have, so why not take action now? Is it the city's intention to simply become grey?</p>
<p>Very important green areas will be destroyed; Green open spaces are of vital importance in an urban city. This is the only authority in Hampshire to have not increased open land. Therefore it seems to me that we will continue to see an increase in people with mental health problems!</p> <p>Many people see the St. James' site as a peaceful haven, which was the intention when the 'asylum' was first planned and built. As with all such havens once our public green spaces on this overpopulated Portsea Island are lost, they are never regained.</p>
<p>The destruction of wildlife would be astronomical (Brent Geese, hedgehogs, toads and frogs, mice, stoats, voles, sparrows, (pipistrelle) bats, slowworms, kestrels, herons, Dartford warblers, foxes, jays, barn owls, squirrels, pheasants, rabbits, dragonflies, skylarks, sparrowhawks, giant green grasshoppers, greater spotted woodpeckers, green woodpeckers, chiffchaffs, numerous songbirds / birds not found anywhere else on Portsea Island are all mentioned)</p> <p>Some wildlife (such as hedgehogs) would become extinct on Portsea Island whereas the vermin population would multiply (rats and mice).</p>
<p>Lack of foresight and awareness of the importance to the entire city of this site. Apart from Hilsea Lines and Farlington marshes, it is probably the last site providing a wildlife habitat happily co-existing with people who can walk and enjoy the tranquillity offered. The density of housing within Portsmouth must now be at crisis point and it is so important to bear in</p>

<p>mind the need for the retention of as many open spaces as possible. I am suggesting that the Council should commit to a total re-think on this development and it would be a great thing if this was totally non-political. It would be a wonderful incentive for the Council to show a commitment and 'Go Green' over this by having the strength and foresight to stand up to the financial interests currently being recommended as the only alternative.</p>
<p>Wildlife on Portsea Island greatly relies the few remaining pockets of relatively undisturbed habitat, even small areas like St James act as corridors or stepping stone between them.</p>
<p>Understand that some 'green areas' will stay as they are protected but still feel that, with the amount of properties being proposed, an awful lot of our green space and trees will disappear and we do need to try and keep as much of it as possible - we need green spaces and we also need trees as they provide this planet with the oxygen it needs;</p>
<p>Langstone Campus site is very important for the wellbeing of Waders / Brent Geese and every consideration must be given to the site.</p>
<p>The Furze Lane Campus is an incredibly important site for migrating birds with particular reference to the Dark Bellied Brent Goose. Any construction on either site will disturb these birds and displace them from their feeding grounds. If the birds cannot feed then they will not be able to migrate to their breeding grounds in the Arctic Circle. The numbers here are significant, so much so that building, or opening up the Furze Lane bus route to traffic, could well drive them to extinction.</p>
<p>Most of the Langstone Campus site is characterised by open space playing fields and views across Langstone Harbour. It is an important Brent Geese over-wintering feeding site, is in the City Council's Langstone Harbour Open Space Coastal Area, and any additional development infringes DCLG'S Planning Policy Framework on Open Space conservation unless equivalent open-space provision can be accommodated elsewhere. It can't be because Langstone Harbour isn't going anywhere!</p>
<p>There are legal obligations to consider and protect some special (European protect birds; bats etc)</p>
<p>Dog walkers dominate St James green. This includes individuals as well as commercial dog walkers. The Village Green at St James has been taken over by professional dog walkers who advertise that they have a secure area exclusively for dog walking. Children are often scared to visit the green. Setting aside more green space for a more substantial play area for local children would be desirable.</p>
<p>The Council report states that the "Developer will need to provide mitigation" This is unworkable. Mitigation is not setting aside a small piece of land that the Geese already use and patting ourselves on the back and saying that we are protecting the geese. Mitigation means actively providing suitable NEW sites for them to use and this is precarious in terms of the Geese actually using new sites. I am unaware of this having previously been used. You would need to contact Hampshire Wildlife Trust and the RSPB regarding this matter.</p>
<p>We can't replace this natural habitat and hope the Geese and other RESIDENT wildlife will move somewhere else. This is not the way nature operates. "Mitigation plan" sounds like an excuse to do whatever the hell they want and say "well the geese have a "mitigation plan" to follow"!</p>
<p>The University has been slowly destroying the local endangered habitats of the Brent Geese for years, in particular using astro turf. It seems to me it's all down to them making MONEY!</p>
<p>At the moment the cricket pitch is on long term lease, how will this be protected from future development?</p>
<p>Concerned that the sports field and St James cricket ground are to be built on. Surely we owe the children and sports people the opportunity to have these facilities for now -and for future generations to come. With obesity a great problem in the city we need to be encouraging people to exercise more rather than decrease their opportunities.</p>
<p>Will the council consider imposing wildlife friendly building on the property developer in their plans? Bat boxes and swift boxes can be incorporated in new builds very cheaply, we have a rich and varied wildlife at the hospital site, they need trees and bushes, not a concrete jungle, please consider this!</p>
<p>The wildlife area north of Moorings way will have increased traffic on its door step, and through it with people on foot.</p>
<p>At the drop-in on the 24<sup>th</sup> of September the NHS provided no surveys on trees, bats or any other animals such as slow worms</p>
<p>The survey that the NHS has done said there was no evidence of bats in the buildings that they had surveyed but they do not just live in buildings, they live in trees etc and I do not think that this has been taken into account especially as there are plans to take down some trees.</p>
<p>You are saying with one breath that the open space on the Langstone Campus and the adjacent playing fields are protected both through local policy and European regulations on nature conservation, but that the developers of these areas may wish to reconfigure the site, which could involve swapping some of the developed area with land which is</p>

currently open space!! How can you possibly allow this and how are you going to tell the wildlife that they must move? There is a need to ensure that the feeding areas for the Brent Geese are safeguarded for the long term and that swapping area for area is not an easy solution to ensuring that this safe guard is effective. Keeping current feeding areas out of the development plan would seem more effective.
I believe you are suggesting you will not build on the cricket field in St James. Do you actually think your electorate are so stupid they do not realise you CANNOT build on this land as it is privately owned - non NHS property, having been sold off earlier. Opposite the cricket field is land which is used by the public. Again, this is not available due to being publicly owned.
Regarding Brent Geese on Milton Common, is this not covered by current E.U. regulation
There are some very large horse chestnut trees on the site, on the boundary with residential properties. Should these trees be removed, not only will it ruin the beautiful landscape, but is there a possibility that properties in the vicinity of these trees will suffer subsidence once the roots die?
As a fairly old aged pensioner no longer able to use a bicycle to enjoy a trip to the seashore, the St James's Hospital Grounds is the only place close enough to go for a nice walk and meet other lonely people to have a chat for an hour or so. Please do not clutter these wonderful green areas up with hundreds of extra houses.
Residents in the area are interested in keeping the area green - identifying and preserving green spaces and mature trees. Hope the developers will work with them.
A precedent has been set RE the habitats of Brent Geese, when PFC lost its appeal to build a new stadium at St Johns Field at Farlington because it was used by Brent Geese.
People of all ages need green space to lead a healthy life both physically and emotionally. A recent study from the university of Exeter suggests that green space in towns or cities leads to sustained improvements in mental health. To remove this from us all is a step in the wrong direction. Portsmouth is already heavily urbanised. Green spaces are few and far between and little to share out among the 205,100 (2011 census data) inhabitants.
Bring back park keepers, because night times after dark our parks are meeting places for undesirables

<b>Form of Development</b>
Development should be for fewer houses - this urban space is not that big and we would end up with similar dense housing stock as most of the city already has.
Consideration should be given to types of houses on the site - high density housing is not In keeping with the area - if the land is to be developed for residences fewer larger properties would have less impact on the sewer and flood infrastructure than many small houses (based on head count alone).
Suggest no building whatsoever on any part of the hospital but believe that the main building could handle around 70 homes or retirement apartments. This would preserve the existing grounds including all of the vital flora and fauna found there.
Preferred alternative plan would be to redevelop existing buildings within the complex for housing and to retain the green areas for our and our children's futures and enjoyment. The main building and villas or the existing sites of villas with more creative development would make outstanding accommodation whilst still maintaining the grounds for its outstanding natural beauty and wildlife for the benefit of all.
If it has to be developed a school should be a priority and purpose built ambulance station for southern part of city and possibly twenty prestige homes four and six bedroomed detached houses.
Any social housing should be located away from existing housing to avoid depressing the value of those houses.
The level of affordable housing that new sites bring is a big concern, and will bring anxiety and conflict to existing residents (many of whom moved to this neighbourhood and paid premiums to move away from issues caused from people who have no affinity for the areas they reside in).
What percentage of these 'new builds' will have to be social housing?? House prices are likely to drop in this area as a result.
The original plan was for 545 houses, the number of houses now has reduced from the original plan. Please can PCC provide the data on which 480 houses been calculated? What is the confidence behind 480 now being the "right number"?
Obviously we would like to avoid any development ending up like the rubbish strewn East Shore Way. Can this be guaranteed?

Very concerned about the proposed housing to be built on the Light Villa site. 57 houses is too many.
If development goes ahead on the Langstone Campus site, it should only be allowed on the currently developed area and not outside of it. The consultation document seemed to indicate that there is a proposal to build not where the existing buildings are – this is alarming to homes adjacent to the playing fields
Concerned about development at Langstone Campus. The coast is entirely peaceful and natural and a wonderful place to walk. Would be concerned if developer were to build on the coastal open space and swap it with the developed area. As well as altering the tranquillity and damaging wildlife, properties would be vulnerable to flooding and damage.
With regard to the University Langstone Campus site, I'd like to know why the cricket ground is excluded from any redevelopment and the fields that Brent Geese and other wildlife use is up for sale to the highest bidder?!
Planning permission should be refused for the two villas site and phase 1, and the scale of phase 2 should be reduced dramatically
Without a fence to separate the hospital from the new housing it will be used as a rat run.
Would expect that as St James will no longer to be a hospital, the entrance from Edenbridge Rd should no longer be a gated entrance that closes in the evenings.
There are Listed Buildings on the site.  Will sufficient care be taken to ensure that the aspect and outlook of the Listed Hospital Building will not be tainted by a totally incongruous housing development simply 'plonked' around it, without regard for aesthetic compatibility or sensitivity? Are we really going to allow this fine example of local architecture to be 'swallowed up' by a housing estate without carefully considering the detrimental impact it could have upon this veritable oasis of inner-city calm?
What provision will be made for the Shaw Trust Beneficial Centre that is situated in the grounds?
There are Tree Preservation Orders on the site.
It would be lovely to have some of the hospital grounds left as green for people to walk through, sit; What will happen to the current woodland walks on the site?
There is some common land on the site
Need to make sure there are no 'accidents' of protected trees being cut down. Will a caveat be placed if this happens the builder must replant to an equivalent of the crown area of the original tree(s) they have destroyed? In the past the council has not enforced the replacement of trees damaged during construction

<b>Alternative Development Proposals for these sites</b>
Sites should be protected not allocated. Surely the most suitable use for this site would be to retain it as a green lung. Save this precious area and spend time and resources to improve on existing developed areas within the city that are sitting vacant and derelict.  PCC could be a shining example to its residents and to other cities if we save this site and use it as a wildlife haven, to show how we can live together with nature. Also be using it as an educational site for schools and clubs, we can educate the adults of tomorrow of the importance of conservation. Because without nature, we do not exist. Many local residents will rely on Councillors to make the right decision for the City and not just build because the Government says so. So why not protect the trees and wildlife which have no one to stand up for them apart from you.  There is no other green area with so much wildlife anywhere else in Portsmouth. Give something back to the next generation, involve schools; take groups into the grounds to see the lovely trees and wildlife, use the chapel as a classroom where they can draw and paint, press flowers, plant bulbs and grow young trees.
A mixed use of leisure, recreation, education and health for St James's Hospital would be more sustainable and more appropriate. The site is characterised by its open spaces, mature deciduous trees and by its "Villa" style buildings. Portsea Island does not have a public park with such a variety of trees in such a well landscaped setting. The mix of uses I have suggested could be adopted within a park setting and could probably utilise many of the existing buildings. These uses would also be far less environmentally damaging.  Community facilities to enhance the site and directly benefit local people would be more appropriate.
The peacefulness of St James makes it ideal to aid recovery, or if building is essential, then for a hospice or care home.

<p>The Main Hospital building could be turned into a residential care home by the NHS or a private developer with the park land setting retained in its current situation for the benefit of all.</p>
<p>A dementia Care Centre should be provided in this unique setting. Maybe look at how Holland treat dementia patients.</p>
<p>Due to the calm nature of the environment it would make an ideal retreat facility for a legitimate religious organisation perhaps also offering much needed respite/convalescence in this frantic world.</p>
<p>Homeless resident building to replace the out-of date one at St Mary's</p>
<p>Daycare, nursery, pre-school or primary school places - alleviating stress on the existing number of places available locally</p>
<p>Surely the land would be better put to use at St James by building a large infant and primary school releasing the sites of meon and moorings way school for development instead. The children would have the lovely surroundings of St James to play and learn in and the empty sites the schools are currently at could be developed instead.</p>
<p>Rethink Tesco's at Fratton Way and put a Tesco store somewhere on the St James's hospital site, and use the Fratton Way site for housing with green spaces</p>
<p>It is not any more houses that we need in this area but a small convenient grocery store.</p>
<p>Langstone Campus: This land is a prime candidate to be turned into a community asset/health centre. You could have a modern medical centre, cum community centre cum social venue which does not currently exist within the area. There could be a youth club for the younger element of our community. QA Hospital cannot cope with demand so it would make sense to have more GP surgeries and help for the frailer element in the south of Portsmouth. Since St. Marys has had facilities removed services are lacking on the South side of Portsmouth.</p>
<p>The best use for the Langstone Campus site will be retirement homes in the more modern accommodation blocks and the Tower Block be demolished to improve the visual amenity of the Harbour. There is no good planning reason to support an allocation of 110 houses.</p>
<p>Allow the redevelopment of the St James's Main Building into a reasonable number of flats, possibly to include an area for a doctors surgery. Alternatively the Main Building could be converted into residential accommodation for the elderly.</p>
<p>I would like to propose that the housing proposed for this site should be majority one bedroomed accommodation designated for the elderly who are currently living in accommodation too large for their needs, thus freeing up 2/3 bedroom (much needed) homes for families. As the majority of residents would be elderly there would be no extra burden on the local schools or particularly the roads. There would probably be increased need for GP services, but one could be built on the grounds or an existing building used for this purpose and perhaps an increase in the local bus service may be necessary.</p>
<p>How about a retirement village, bungalows if you must build.</p>
<p>The location would provide a peaceful, sylvan environment for the over sixties with a mixture of properties to buy and to rent. A dementia unit could be incorporated and some support services too. This would free up family homes elsewhere, and would generate far fewer cars.</p>
<p>Why did you not consider building affordable homes for the elderly in these areas? There are many elderly people in Portsmouth still living in large family homes who would, I am sure, prefer to 'down size' to a pleasant green area such as the Langstone and St James sites rather than to the flats recently built on Milton road for example.</p>
<p>The area of Milton has a long association with vulnerable people and the hospital was put here for good reason. I would hope that would continue in the new use in some way, perhaps some sheltered accommodation.</p>
<p>I strongly object to the St James Cricket Field, the University Rugby Field and University field fronting Langstone Harbour being released for housing. When the two latter fields are no longer needed by the University, I would like to see enclosed Nature Reserves.</p>
<p>The area could to be set aside as an area of outstanding natural beauty – leaving it as it is and set up a Wildlife Resource Centre where generations can come to appreciate it. (perhaps retaining the school premises?) Funding could come from charitable organisations. One which could be approached is the Wildlife Trust who have already developed 47 smaller trusts throughout the UK containing protected wildlife sites. Working with members, trustees and volunteers (and there are plenty of those in Milton!), they ensure that the animals, trees and flowers are allowed to flourish. Could not the University Of Portsmouth be involved with this project?</p>
<p>The Langstone campus area could be preserved for green open space and returned to nature to expand the "green lung" function of this area.</p>

<p>Whilst we are being told that Portsmouth needs new housing, but we are equally or perhaps even more so, struggling for well-paid higher skilled employment – we desperate need new jobs that are not just low paid, often part time, retail and restaurant work. The mature parkland setting of the hospital grounds would be a lovely base for a high tech or office based business. I can think of a couple of fine examples that my work has taken me to: the Lucent Technology Park in New Jersey and Fidelity Investment at Tadworth in Surrey but I am sure that there are many others, both high skill high paying employers that recruited and trained locally. Portsmouth used to be the base for financial and high tech firms such as Zurich, IBM and Schroder Life so we were able to support such businesses in the past, why not again?</p>
<p>Research Centre for scientific health or animal studies.</p>
<p>If not for the elderly then why not keep the Langstone site for further education, run keep fit and dance classes there, art and photography classes etc etc and open the playing fields up to the public. Build a doctor and dental practice there also.</p>
<p>It would be much more suitable to retain the site for continued public use, as well as retaining more of the current usage for health and education, or perhaps care.</p>

<p><b>Need for these developments</b></p>
<p>Why does it need to be developed?</p>
<p>There does not seem to be any evidence of need for these homes</p>
<p>Portsmouth is the only Island city and very densely populated already. Portsmouth is the most densely populated city in the whole of Europe besides inner London, therefore, Portsmouth should be designated like inner London so that no more houses can be built.</p>
<p>During a recent consultation on proposed developments in the Milton area of Portsmouth, it was explained that the government policy sets a target of a minimum of 5% year on year for additional new housing for each local council whether or not there is a significant impact on the existing environment. It was also indicated that London is exempt from this target.</p>
<p>Due to the city's restricted boundaries (an island) and the fact that it's more densely populated than London the pressure is far greater than that on London. With such a detrimental environment and uniquely restrictive situation it seems imperative that Portsmouth becomes exempt from further house building requirements. To prevent further encroachment on our valuable green spaces is it possible to pursuing the option of asking the government to change the housing policy targets for Portsmouth in view of its unique situation. If we are to save our city from deteriorating further into a grid-locked concrete jungle and a depressing, unhealthy place to live then this is something that must be seriously considered.</p>
<p>Portsmouth has already met the Government Housing targets, so Portsmouth should refuse future developments.</p>
<p>a) The current site allocations including the Langstone Campus is 217.  b) The Housing target set in the Portsmouth Plan for the period to 2027 is 12,254 and the City Council's Strategic Housing Land Availability Assessment (SHLAA) update in November stated that these numbers would be exceeded.  If b) is predicated on a) where is the need for 480 houses?</p>
<p>There must be areas on the outskirts of Portsmouth that should be considered. There are areas out of the city, or at least north of the city which is off of the island, where development would be more appropriate.</p>
<p>This part of Portsmouth has many properties for sale and to let; and vacant / unused properties. Why are these not used first?</p>
<p>Support the expansion of the site</p>
<p>Who are these houses for? Most of the new residents probably do not already live in Milton?</p>
<p>The social demographic of Portsmouth is completely unrecognisable to that which it was 15 years ago, All of these new people are coming from far flung corners of Europe, to the detriment of young local people looking for housing &amp; Employment.</p>
<p>I know immigration is a “taboo” subject but if you took away the number of people in Portsmouth due to this issue I would not be surprised if it turned out there was no issue regarding building further properties in Portsmouth as a whole, indeed we would have a surplus of housing.</p>
<p>What other sites have been considered by PCC? Please can PCC provide information on why the St James’ and Langstone University sites are the “right sites”</p>
<p>These allocations amount to 25% of the whole city’s allocation and is not required by government.</p>

Population - The city plan for Portsmouth reports that sustainable housing in the area require development of some 12,800 houses by 2027, however we live in an area which is recorded as being either more than, or running second only to London as the most densely populated city. New developments on the scale proposed will certainly attract people from outside the city. It is not a development, it seems, intended to manage the City's current population. At what point does it become recognised by the City Council and/or the government that in fact the whole area of Portsea Island is saturated, and whilst land may be identified for development, it is in fact in no way sustainable in light of the whole impact upon the city? What is the requirement or standard set to argue this point and has this in fact been considered and argued to date? The City Plan makes reference to PUSH and working with neighbouring authorities to share the burden of residential housing however we are seeing no sign of this being brought to the fore to protect this area. Why not?

There does not seem to be any evidence of a financial imperative for this land to be developed in this way.

### **Need for Further Work**

Need proper consideration of infrastructure needs

Before this development is considered, an in depth report/study must be carried out into what facilities such as Schools, Doctors, Dentist, Shops, Buses and Recreation will be included in the plans to cater for the new residents; This must include previous recent permissions and developments

The council should carry out a study into the effects of the project, then improve the access/facilities to the proposed site

Question neutrality of NHS figures on transport, wildlife etc - call for independent assessments

I would like the council to close Velder avenue for one week so that the traffic would be filtered more appropriate into the city to see what the outcome would be.

The document states that primary education is most likely to be affected by the proposed development. Secondary and further education will also require a full assessment with a sustainable capacity increase plan being developed.

In conclusion there clearly needs to be a complete halt to the plans until all thorough assessments have taken place, including Habitats Regulations Assessment. There needs to be more time for residents and professionals to express their opinions.

There are pipistrelle bats on the site. When demolishing old buildings a S80 notice has to be completed - this usually does not include the question of protected species. I request a bat survey be undertaken.

There are newts in the pond at the Shaw Trust site. I request a survey to ascertain if these are crested newts; another protected species.

Algal blooms in the Langstone harbour have become more prevalent to the naked eye. Any assessment for the effluent being discharged should consider the environmental impact and changes to the marine ecology. Studies should be carried out to ensure the biological oxygen demand as a result of the additional effluent does not exceed manageable levels. Algal blooms can dominate and drastically and often irreversibly impact marine environments. We have no right to assume 480 houses can be managed without further study as the council would be neglecting its duty of care to the environment.

There is Japanese Knotweed on site of which the gardeners apparently just cut it down and done nothing about it beyond that. I believe that a considerable time is needed to remove it safely. This is on one of the development sites and was reported by a resident as it would appear to be encroaching on their property. This should be fully investigated.

### **The Consultation**

What is the purpose of the consultation? - Planning officer has said that nothing can be done to prevent these developments. Is the consultation purely a box ticking exercise? Waste of public money.

The official attitude at the Milton Forum appeared to be that, because the Hospital is a "brown field site", there is nothing that can be done to stop residential development and that makes this resident very suspicious of any apparent consultation.

Can I formally ask why the council states that it is a proposal when councillors say the decision has been practically made already on the future of the site?

Can I formally ask why the council invites locals to discuss the proposal via consultation meetings, giving the impression their views are listened too, when councillors state the decision is already made?

<p>Hope that the consultation will persuade the planning department to do all in their power to prevent the proposed development. Planners should give more consideration to the residents in the area and the impact that this number of houses will have on them before proceeding with this scheme.</p>
<p>I would urge you to have more consultations before making a rushed decision which will affect many, many peoples quality of life. Suggest you take more time to plan and maybe spend some time up our area and speak to locals</p>
<p>This development looks like it is being rushed through using stealth with the hope that no one notices! Well it's been noticed!</p> <p>I do not believe the council have thought this through properly and feel that yet again they are pushing planning through via the back door by giving little notice for the public to be able to respond.</p> <p>This development is being agreed with very little opportunity for people to comment. Is the administration trying to sneak this through? The PCC document "Portsmouth Plan, Further Proposed and Amended Site Allocations at Locksway Road, Milton and St James' Hospital and University of Portsmouth Langstone Campus" is available for public consultation from 15th August yet the council meeting on the planning decision is scheduled for 14th August 2014. How can the public comment and be consulted on the Plan when the planning decision will be made prior to the Plan being available for public viewing?</p> <p>A full traffic survey and public consultation was requested before the Site Strategy Document was to be published but these have not taken place. Why?</p> <p>I do believe that the consultation document capture the key concerns of, access, traffic, infrastructure, environment, and probably most important the fundamental change to the character of the area in which we live. Unfortunately, whilst the summary provided recognises the challenges it is offers no explanation on how these might be addressed.</p> <p>We understood that the city council is required to consult with residents and listen to their views and concerns when considering planning applications: we do not feel that the city council is having due regard to the strength of feeling of residents over this large development, where existing green space is being lost.</p> <p>I would also like to note my disappointment towards PCC as an employee. Working at the St James' site, I did not receive any notification or communication regarding the proposals to close down the hospital site. This is leaving those who work there in limbo and I do not think is fair on a work force that PCC supposedly cares for.</p> <p>Thank you for putting on these further opportunities to talk with planning officers; we attended the Beddow Library question and answer session on 28th August, we found it very helpful talking to James Sandy, I think it was who gave us some very good insight to the situations and dilemmas facing the City Council.</p>

<p><b>Planning Policy &amp; Process Matters</b></p>
<p>As the National Planning Policy Framework and other guidance acknowledge, any new development will increase the strain on the local infrastructure, including the road network, local amenities, and levels of pollution. Therefore, it is vitally important that, in the event of the development being approved, the developers must be required to pay in full the money due under the Community Infrastructure Levy Regulations. This will pay for the costs of upgrading the infrastructure so that none of the burden will fall upon the local Council and therefore, the council tax payer. Such upgrading will be expensive. It is important that the levy is collected in full.</p> <p>I see the Tesco store at Fratton Way was passed as an "out of town development", does this mean the PCC are extending their "let's concrete over the city policy" to urban suburbs?</p> <p>The Local Plan/Core Strategy states that</p> <p>a) The majority of new housing development will be directed towards the strategic sites of Port Solent, Tipner, Horsea Island, Lakeside Business Park and the City Centre for ease of access to goods and services.</p> <p>b) The plan aims to maintain a good distribution of health-care facilities across the City.</p> <p>Neither a) or b) is satisfied with this magnitude of housing development:- public transport is poor, essential services are concentrated at Fratton and the City Centre and doctors surgeries are overrun (locally they are not adequate).</p> <p>Portsmouth Plan Core Strategy doesn't allocate any housing for the University Campus and only 150 for St James's Hospital. The Core Strategy is the Council's (as in yours and mine) vision for development until 2027 and the Strategic Housing Land Availability Assessment shows it has the capacity to deliver between 11,500 and 12,800 new homes between now and then including the 150 at the Hospital Site.</p> <p>The same Core Strategy directs development towards the City Centre and public transport hubs and Langstone Harbour isn't in that category is it?</p> <p>Housing Site Allocations come through the development Management process and that's where we are. The Council have every reason to reject additional housing numbers in Milton because otherwise it is inconsistent with its own Core Strategy</p>

Getting back to our Local Plan, the policies pertinent to the Langstone Harbour Coastal Zone and those for St James's Hospital are preserved in the latest one. These are policies MT2/3 & 4 and LH 1 & 2. The Hospital Building is considered for a number of alternative uses including, continued health-care, private hospital use and educational use. It is not restricted to residential conversion. Look it up: - you're on the Planning Committee!

I am objecting to the allocation for 410 houses in this neighbourhood. Should the Council allocate the area for this number it restricts the opportunity to appeal when the landowners do make a future application for development and it would undermine any alternative more sustainable uses. Such an allocation is in any case inconsistent with the Council's own democratically prepared Plan. That is why I said you were mistaken in proposing that an allocation of that magnitude is the best way of controlling development for the residents of Portsmouth: - that proposition makes no sense at all.

I think the Council is better to refuse the allocation and deal with any application if and it comes along. If it's by the NHS for housing (or for another use) it can be decided in the usual and proper way. The Housing Allocation directs future development towards housing and we both attended the Forum on 17th September:- the vast majority in the hall that night didn't support housing did they?

The current guiding legislation is the Planning Policy Framework and the presumption is in favour of SUSTAINABLE development. A housing allocation for these sites changes the presumption in favour of housing but this is inappropriate.

I most strongly object to the development of the St Johns' Hospital site due to the many areas of the site being developed or green field, never been built upon. These areas should not be developed. Keep to the existing areas of building.

Object to St James's being considered a brownfield site. This is morally and environmentally wrong and the site should be re-classified as a greenfield site with the utmost urgency. There is so much diverse wildlife within St. James' and the University QEQM campus that I fail to see how you can state that this is a 'brown field site'. You will acquire more kudos from endorsing this area than from destroying it.

Brownfield land should be used first.

There is not the political will to protect green spaces and facilitate development on brownfield sites instead.

I suggest the Council look to develop brown field sites, where the existing infrastructure can cope with additional numbers, i.e. The News Centre in Hilsea.

It is stated that greenfield and brownfield sites are not differentiated between for planning purposes; however, there is a difference that cannot be ignored. An Industrial (brownfield) site of the size of the St James Hospital and Portsmouth University sites would require an existing substantial road network to serve it, however, this network does not nor has it been in place.

In 5 or 10 years time the council will doubtless be undertaking the same site allocations exercise to establish sites of interest for future dwellings to be developed up to 2034. Will you be looking at all the remaining green spaces, parks, Southsea common, Great Salterns golf course, Milton common!, how about the cemeteries?

What other areas of Milton and Eastney are being eyed up by hungry developers to develop more housing, create further overcrowding, add to an increasing local population, and promote more social and environmental issues that will be left unresolved?

Could designating it as a conservation area give additional powers, as I certainly believe the area is of special architectural and historical significance?

Agree that the two sites must be considered as a single issue. They are inextricably linked due to the geography and the environmental effects that will impact on the area.

Understand that at this stage this is not a planning application, but all the issues must be considered at this stage and clearly not left for deferred consideration.

Developers should be required to submit planning requests for the whole site instead of in a piecemeal fashion.

I believe piecemeal development like this is the most dangerous type of development as it is done little by little, and little by little our city is becoming greyer and more barren.

I was, and still am, horrified by the size of the total residential housing planned for the area, including the University site. It worries me that the planning application and committee may not take the total development into consideration when looking at the first part of the planning application.

I do feel that writing this is probably a wasted effort on my part and that the development will be pushed through whatever the effect on residents of the area, loss of habitat, strain on roads and services, etc, but would make the plea that the

Planning Committee look at the whole development proposed and not just the first one in isolation.
I have noticed you have just approved a decidedly ugly building in the centre of Portsmouth as part of student halls of residence. Even though several councillors have expressed concerns about design, this was still passed. Is this not because it would cause you problems regarding development of the Milton Campus?
A blanket government policy to build more homes should not preclude sane and coherent planning at a local level, particularly in such a congested area.
I would like to know why phase 1 of the proposed development is being brought forward to commence in 2014-2015 with very little in the way of thorough assessment of these sites? This phase, according to the proposal map, appears to be the construction of new housing on the green open areas of the St James's Hospital Site.
I believe you intend to build 200 flats on the old Southsea Community land. Also, I believe the Brook Centre is relocating to the new Southsea Community Centre and this land will be used to build flats.
An opportunity may have arisen, but would it not be better to take the time to plan it properly rather than proceed with haste?
We do not believe that the city council has taken on-board the requirement for residents to have a "quality place to live": the city council should be aiming to provide "a healthy city" within a "greener Portsmouth".
We do not believe that the planning department has the required skills and vision to effectively undertake the planning role for such a large city: political and member interference is obvious to all residents, with significantly important developers seemingly being able to obtain permission for inappropriate developments. This is particularly apparent from the fiasco of approving the Ben Ainslie monstrosity in Old Portsmouth, effectively ruining the wonderful and historic area around "Spice Island". Such a decision must reflect a lack of respect for residents and their environment - the Ben Ainslie building is totally out of character with the area and much too large, but is approved because of the perceived importance of the developer.
The City Plan should only be produced and monitored by officers and members who have the required experience and skills, knowledge and vision to take the city forward - not backward - by concentrating on the basics for the city.
Communications from the council with regard to and quoting adherence to the National Planning Policy Framework and the fear of losing appeals against this legislation are not correct. The NPPF when examined in full does give ample and specific scope within several of its sections to allow for a local council to consider the issues where the public and environment are adversely affected. The NPPF should not be looked on negatively by the council and treated as a fait accompli or used as a default position. It should be looked at proactively and creatively scrutinised. British law is ultimately created by appeals and challenges in its development.

<b>Democracy &amp; Representation</b>
The council are elected to speak for the community and the community does not want it.
With the continued influx of immigrants, this country will never be able to satisfy the needs for sufficient housing, schooling, Doctors, Hospitals, water and highways. It is time our local politicians spoke to their colleagues from all political parties in central government regarding this issue. To continually ignore these issues can only result in more and more people turning to UKIP when the General Election is upon us. Bear in mind now, your actions will undoubtedly come back to haunt you.
This proposal will alienate voters and drive them to the more extreme parties. Now, surely, is the right time for the Council, and all those in politics, to make a significant gesture and to show that they actually care for the communities who are here and who voted them into power in the first place. By refusing the proposed development of 480 homes at Milton, the local Council and politicians would seize a golden opportunity by showing they care for their local people and put their local communities and the quality of life here in Milton at the top of their agenda. General Election looms - please do give any more ammunition to the extreme parties!
To ignore the electorate now can only result in the electorate voicing their disapproval more forcefully at the General Election.
The council has a priority to gain profit over what is right environmentally and in the best interest of the community.
Selling for residential use is blatant profiteering at the expense of the local area
The Local Plan is a democratically prepared document. There is no overall majority in the Cabinet and no-one has the authority to recommend an allocation in excess of the 217 already approved.
The Council is behaving recklessly by continuing to embark on such projects. Milton is being systematically ruined by

<p>successive Councils, as is Portsmouth in general. The population in Portsmouth is spiralling out of control. Indeed, Portsmouth is now becoming a “slum” in many areas.</p>
<p>At what point in the future will the Council have the courage to stand up and say Portsea Island is full?</p>
<p>I have seen the usual blame game between Councillors and heard excuses, almost as if the deal is already done, for why the numbers cannot be restricted. I would prefer Councillors work together, actually for the good of local residents, to come up with a better solution for the use of these sites.</p>
<p>What the Council and the Government need to do is address the issues of a growing population and its resident population's quality of life</p>
<p>Under the 'freedom of information' do we know if the people agreeing to this development live in the local area ??? As if they don't then it is likely for them to agree to additional housing as this will have no impact on them !!</p>
<p>If you cannot work out why it is impractical to put this amount of housing into this area, then you either cannot be bothered to take a look or consult with residents, or you are just incapable of understanding (or listening?) and therefore unfit to be in a position of power making such important decisions.</p>
<p>Promises are being broken and I would deplore the members of the cabinet to take a long hard look at this situation when making a decision on the development in Milton.</p>
<p>We live in a democracy so listen to the people that live in the area after all we are all council tax payers and you are elected representatives. Don't let this decision go like recent projects where it looks like the people were ignored.</p>
<p>Who will benefit from these houses? With the council rent them out at reasonable rents? Or if they are for sale, who will be able to afford them, with mortgages so difficult to get?</p>
<p>Since I have become aware of these plans to destroy my local area, I have attended the St James Church meeting and was very surprised to hear that the Conservative led Portsmouth City Council and the Liberal Democrats are all actually against the proposed development. However it appears that at this late stage there is very little that can be done to prevent this development from going ahead. Please help us find a way to stop the building of 480 houses and the destruction of St James Hospital and Portsmouth University Langstone Campus.</p>
<p>I do not believe you comprehend the strength of feeling from people who live in the area.</p>
<p>Over the years we have consistently seen the views of local people ignored. The norm seems to be that developers apply for more homes than they expect to be given permission to build. If the original application is refused, they submit an amended application for the number of homes they wanted in the first place, giving local people the false impression they have had some influence over the process. They also have a habit of making a financial contribution to small local projects as 'sweeteners', which in reality are no more than bribes. There seems to be little or no accountability since developers do not have to answer to local people. They rarely live in the area they want to develop so do not have to live with the consequences of their actions. We who do are desperate to have our voices heard. Please will you hear them?</p>
<p>We look to the local council to stand up to government diktat and be seen to be doing so.</p>
<p>I have heard the leader of the council (Conservative) claim she is totally against the Milton development and the Lib Dems have also created a petition against the development (foisted on them by the Conservatives??). So lets hear a very clear and strong message from the council on this and not weak words and the blaming of party politics.</p>
<p>Take a vote as to who is for and who is against this development and make the results known.</p>
<p>The cry for growth will never cease until a major catastrophe happens. This won't be the last call on Portsmouth to take on large developments so a stand needs to be made now. It was said at a previous Milton meeting 'if only we had stopped the Milton development when we could'. Well you can now. Just say NO. Also at that meeting were people saying 'what can we do' – if that is the case I suggest they get another job and let room for people who will actually try.</p>
<p>If the proposed development to St James' Hospital goes ahead with no changes after the large number of locals who have expressed their deep opposition, we have proof City Council only go through the motions of listening to residents with never an intention to listen.</p>
<p>As a responsible planning committee I am sure you will carry out your own impartial and independent wild life risk assessments and traffic surveys and report fully to council tax payers.</p>
<p>Also there has been so much ward closure and reduced staff levels in the local hospitals. Q.A. Hospital is already unable to cope with patient intake and very little is now left of St Mary's. Has enough thought been given to the few services remaining for mental patients at St James? And also to the loss of such a wonderfully therapeutic setting with its historic trees and wildlife?</p>
<p>A lot of money would be wasted by the NHS as they have modernised most of the buildings on the Hospital site</p>

I recently paid a visit to the Shaw Trust horticultural site within St James' Hospital grounds. I spoke to a gentleman who works there, who told me the whole of this beautifully cultivated landscape would be obliterated if planning permission is obtained for it to be razed to the ground after 27 years of careful nurture and therapeutic industry for Portsmouth residents with special needs. Similarly I spoke to a childhood acquaintance who works in the St James' Hospital kitchens, and who told me an identical story of pristine buildings and brand new decor being destined for the scrap-heap if re-building goes ahead.
Generally we are appalled at the way all consecutive Councils have treated the Milton area, the whole infrastructure has not been considered over many years. Surely residents' well – being should come before massive financial profits.
Please reconsider your plans; take the time to consult local residents and councillors; and be brave enough to think of long-term solutions for our city and not just grasp at short-term gain.
An opportunity is being missed to use the buildings and land for the greater benefit of the residents of the area and for Portsmouth in general.
The presentations to date, from your department, have pretty much focused on why "we cant stop this". I fully appreciate you will be partially restricted to what you can stop & not allow. But you DO have the ability to heavily INFLUENCE or DICTATE what COULD be done on this site. I appreciate you are doing your jobs, but all of, including the leader of the council, have the ability to heavily restrict what goes on at this site. I'm not asking you for no development. I am asking for the absolute minimum & for you to keep the are as one of the few green spaces protected, in the city that you serve.
The proposed development really does have to be done right at this and at every future stage of the application process. The council needs to be sure that all the issues are appropriately considered. The effects of decisions the council makes now will have wide implications for now and for many years to come. What is decided now cannot be undone in the future. Getting it right is paramount for the local community the council represents.
It is not only older people that are concerned about these developments. Worries and concerns about the impact of the development lie among the younger generations of Portsmouth too. For example on the train to Havant college students discuss the issue but I have noticed that few have bothered to take action. This is because young people have seen so much building around Portsmouth in their time they believe it will happen regardless of their opinion. Those who are local to the site talk as if the houses are already built with the thought that they our powerless.
Believe this is already a done deal
Thank you for all your hard work, which I guess gets very little thanks

<b>NHS / Property Services</b>
It is wrong for the NHS to sell a site so magnificent and beautiful and which is a perfect surrounding for people who are ill as well as being a much loved part of the community. With an increasing and ageing population and ever growing city it is wrong to decimate another hospital. St Marys has already been reduced in size by over half and the diminishing of St James means hospital space within Portsea Island will be down to less than a quarter! Although QA has increased in size in the last few years it is not by as much as the loss from the other hospitals.
The NHS should be thinking more of the well-being of the residents here.
The only reason for building homes here is so that NHS Property Services can make maximum profit for the Government with more houses meaning more profit. Milton people don't matter to them.
The Plan shows that very little of the existing St James' hospital site will be retained by the NHS. How does this align to the rationalisation of services between St James' and St Mary's announced by PCC several months ago? At that time, the announcement stated there would be no loss of services but surely the sale of such a large area of the St James' site will mean exactly that? Who will benefit financially from the site sell-off?
The fact that NHS Property Services Limited, the company set up by the Department of Health to sell off St. James' at as much profit as possible, served notice on the Harbour School completely beggars belief and shows that we are dealing with a ruthless organisation that lacks any moral compass. This will not just cost millions of pounds to relocate the school, it will also take these vulnerable young people out of an environment where they are safe. With the scandal of Rotherham I firmly believe that the school should be allowed to remain in its present setting and not demolished to make way for more profit.
As a taxpayer I am also concerned about the amount of money that has been spent by the NHS over the last few years on an extensive refurbishment of the main building at St James Hospital both externally and internally. Just for them to be put up for sale
I read last January the Financial Times report on the short but chequered history of NHS Property Services where financial and operating incompetencies have been investigated by The National Audit Office amongst others. I also

attended the Milton Neighbourhood Forum on 17th September and now have very serious doubts on the reliability of this politically driven organ of government to produce unbiased data on traffic surveys and bat and other wild life appraisals which may curtail or even prevent the development.

The NHS Property Services state that on the creation of the NHS in 1947 all land occupied by them was transferred over to their ownership. However, there appears to be no primary or secondary legislation concerning this and there is no existence of documentary evidence. The 75 acres of land, some of which encompassing the St James' site was purchased in 1879 from James Goldsmith by Portsmouth Council. There is a record of an application to tender for the 'construction of a lunatic asylum at Milton, near Portsmouth (Contract No. 2) in the Hampshire Telegraph dated September 13th 1875. I do not believe that there is any evidence of a transfer of property to the NHS, thus, rather than transfer ownership it is a case of a transfer of stewardship of the hospital and grounds to the NHS, now that the NHS has made the decision to vacate the property their stewardship ends and the land should be returned to its owners, Portsmouth City Council.

**Effects on City Image**

Has anyone taken into account that although short term this will provide money, long term the economic effects could negatively spiral. High unemployment levels could occur due to overcrowding let alone a knock to the sizable tourist industry. It is unlikely that tourists will come to an overcrowded, polluted, heavily congested, low quality city especially if they have children. I had hoped to have a career within Portsmouth as it is my home city. However, the destruction of some of its best aspects is off putting and it is developments like this that would push me away in search of a better quality of life.

Businesses will move out of Portsmouth if they cannot simply move around the already congested Portsmouth

We are always hearing the national cry for 'growth' and the fear that businesses will not come to Portsmouth. Businesses will come if Portsmouth is a pleasant place to live and that pleasantness will be destroyed if planning is only for growth.

Of course there is a demand for housing, it is national news and there is an obvious pressure on councils to meet targets, but surely the emphasis should be on developing brownfield sites and preserving such areas of green space that are rapidly disappearing from our cities. Wouldn't you want Portsmouth to be seen as an attractive city to visit and reside in, rather than an amorphous mass of concrete, brick and tarmac, a city with constant traffic and social problems that this proposal would be a major step towards?

Sea water quality is also affected by the sewerage, under current pollution testing it is considered acceptable, however, even if you ignore the tightening of the water quality rules from 2015 without additional remedies the quality of the sea water will decrease presenting the danger to health of further pollution would be increased. Southsea beach is still popular with bathers, what proportion of local trade would be harmed if the beaches were considered unfit for bathing?

## 2014 Milton Sites Consultation Responses - PART 2 - Statutory & Other Consultees

### Hampshire Fire & Rescue

Give advice on: Access for Firefighting; Water Supplies for Firefighting; Installation of Sprinklers; Fires Safety for Timber Framed Buildings

### Langstone Harbour Board

It is difficult to imagine how the inevitable negative impacts upon the Chichester and Langstone SPA which will arise from an increase in dwellings of such magnitude in this location could be mitigated for.

The proposal recognises that wading birds and Brent Geese utilise fields upon the Langstone Campus for feeding and loafing, and additionally use many other fields in the vicinity of the proposed development. In addition, the mudflats and shingle banks and spits in Eastney Lake (adjacent to the proposed sites) provide a food source and roost sites for further SPA bird species.

The proposed development will cause great disturbance to SPA birds during the construction phase, will result in a much higher number of people recreating upon sites currently important to birds (thereby making them unusable to the bird species) and is also likely to disrupt flight lines and therefore the connectivity between these and other important feeding and roosting sites in the vicinity.

Creating meaningful mitigating for the loss of SPA bird feeding sites and likely dramatic increase in human disturbance in this location is likely to be extraordinarily difficult, if not impossible.

### Southern Water

Southern Water provides sewerage and wastewater services to the area. Paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance, requires that an assessment is made of the capacity and capacity of infrastructure and its ability to meet forecast demands.

As you will be aware from our previous correspondence with your Department, Portsmouth City is served by a combined surface water and foul sewerage system (which dates back to Victorian times) and is at capacity. Any additional development would require improvements to the existing sewerage infrastructure, or a reduction in current surface water/highway drainage entering the system. Accordingly, we consider the need for additional local sewerage infrastructure should be included in any development proposal and propose that the following wording is included under the Section on 'Infrastructure Needs' for both sites:

Local sewerage network: The capacity in the local sewerage network is insufficient to service the proposed development. The discharge from the redevelopment should be no greater than the existing levels or involve the removal of surface water runoff from the foul system. If this cannot be achieved, an upgrade of the existing local sewerage infrastructure would be required before the development can connect to it. It is expected that this matter will be addressed by the developer to the satisfaction of the local planning authority.

### Hampshire & Isle of Wight Wildlife Trust

The Trust remain concerned that the allocation of St James Hospital and the University of Portsmouth will result in a likely significant effect on the European protected Brent goose population.

The Trust believes that the Portsmouth Plan is premature in allocating these sites as there is no certainty that the geese will be protected from disturbance arising from the development proposals.

We recognise that that the plan requires a project level Habitat Regulations Assessment and requires developers to provide for a mitigation plan covering the impacts on the protected sites and species. However we would look to Portsmouth City Council to provide high-level strategic solutions to address the levels of uncertainty. To date we do not see the evidence that would provide us with the certainty required to find the plan sound on this point.

As you are aware the evidence gathered as part of the Solet Disturbance Mitigation Project identified that housing growth can lead to disturbance of waders and Brent geese. When we met, together with the other nature conservation organisations (RSPB, Natural England and your own ecologists) we explored the options of how the protection of the geese from disturbance could be achieved and concluded that in the short term it would be a major challenge and probably impossible.

There may be options in the future to find long-term strategic solutions at Milton Common and elsewhere but these would

have to be in place and being used by the geese ahead of any development to provide us with sufficient certainty required under the Habitat Regulations.

As such we question whether the sites are sufficiently deliverable to be allocated at this time.

### **Environment Agency**

Having considered the new site at St James's Hospital and the extension of the site boundary at the University of Portsmouth Langstone Campus I can confirm that we have no issues to raise regarding either of them.

### **Liberal Democrat Ward Members for Milton and Baffins**

We recognise that the 2000 Planning Inspector judgement, which upheld an appeal against the refusal of up to 200 homes on the St James' Hospital site, means housing has to be part of any future development on these sites. However, the Council has failed to think creatively about ways in which development can be minimised.

We know the numbers proposed are the Council's figures, not the NHS'. We believe them to be flawed in five ways:

1. There has been no independent examination of whether the roads can cope. The 2006 Local Plan says no residential buildings can be built unless it can be proved that the highway network can cope. The Council has not done the modelling work required to find out the number of homes that fulfils that planning policy requirement. Until it does, it simply cannot know whether its numbers are right or not. To get the NHS to do it instead, as is the case now, is not acceptable.
2. The impact on Brent Geese of developing the Langstone site in particular is not certain, as the Hampshire and Isle of Wight Wildlife Trust has pointed out. This version of the Site Allocations document allows development on land where Brent Geese are likely to congregate, something the 2013 version did not. Until those assessments are made, we agree with the Wildlife Trust that it is premature to allocate these sites.
3. The Council has not examined potential alternative uses in line with the city's future needs. We know we need more sites to deal with our city's increasing care needs. Yet the Council has refused to provide the money to buy land to bring that about or spoken with potential private partners to do so. When running the Council, we looked at the Two Villas site for a care home precisely because we knew this was coming. We were told it was not needed then. It will be soon and it is negligent of the Council to ignore that.
4. The numbers proposed exceed the five-year housing land supply the 2013 version put forward, therefore are homes we do not need.
5. There is no connection between the cumulative impact of development on these sites and others in Milton, such as that at St Mary's and the recently-granted store at Fratton Park. This is especially relevant with regard to traffic, as they share the same road network.

Instead, we propose a vision for the site that deals with these environmental, housing and care issues:

1. We ask that previously protected green space on both sites continues to be protected through its removal from the Site Allocations document. This will protect green space and minimise the impact on local wildlife.
2. Include a presumption against unsustainable development across both sites.
3. Conduct independent traffic and air quality surveys before allocations are confirmed to see what level of housing the area can handle. This would bring any allocation in line with the 2006 Local Plan restrictions. These surveys should also take into account the cumulative impact of the developments at St Marys and Fratton Park.
4. Buy the Harbour School site, alone or with partners, and continue to use it for education and healthcare uses. Constructive discussions should be opened immediately to deliver provision that meets the city's care needs.
5. Reallocate the 58 homes set aside for the Harbour School site in the 2013 version of the document by redeveloping other buildings on the site.

Given that no-one knows the number of homes that will meet the 2006 planning policy restrictions on traffic, allocating 370 homes is premature. Instead, we should use this document to deliver a vision that will meet the housing, education and healthcare needs of our city, not the financial demands of the NHS.

### **Natural England**

### **University of Portsmouth Langstone Campus**

In our response to site 70028 in the Site Allocations consultation (our ref. 81686 dated 5 July 2013) we stated: It is Natural England's advice that this allocation has the potential to have a likely significant effect due to proximity to a number of sites used by Brent geese and waders, and also proximity to the Chichester and Langstone Harbour SPA. The amendment to the site boundary to include the playing fields/SPA supporting habitat is likely to increase the potential for likely significant effect, and was not included when the site was considered by the Habitats Regulations Assessment (HRA) of the Portsmouth Site Allocations.

### **St James's Hospital**

As this site was not included within the HRA for the Portsmouth Site Allocations it cannot currently be ascertained that the site can be delivered without likely significant effect on the nearby Chichester and Langstone Harbours SPA and Ramsar sites, and Solent Maritime SAC. We note that the Sustainability Appraisal states that the conclusion of the previous HRA for 8102 (Two Villas) can be applied to this proposed allocation, however given that 8102 related to 38 dwellings and the St James's Hospital site is proposed for 370, we don't not agree that this is the case.

It is Natural England's advice that due to the fact that no information is currently available with regard to the deliverability of mitigation measures for the St James's Hospital or Langstone Campus sites, due to the absence of a Habitats Regulations Assessment, there is insufficient information to conclude that the additional allocations can be delivered without likely significant effect to the nearby European sites.

### **Highways Agency**

The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. In the case Portsmouth relates to the M27, M275 and A27. We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth in Portsmouth without careful consideration of mitigation measures. It is important that Site Allocations Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. The HA in general, will support a local authority proposal that considers 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.

The additional sites at Milton St James's Hospital and University of Portsmouth Langstone Campus will unlikely have a material impact on the safe and efficient operation of the SRN individually. However, any proposed additional sites will need to be considered in the context of the cumulative impact from already proposed development on the SRN.

Refer to background document: Department for Transport Circular 2/2013 (The Strategic Road Network and the Delivery of Sustainable Development)

### **Marine Management Organisation**

The MMO has no comments to submit in relation to this consultation

### **Portsmouth Climate Action Network**

PCAN as a group do not think this redevelopment should go ahead in its present format. There needs to be some sort of plan to make sure that as much of the biodiversity is spared. There aren't many green spaces left in Portsmouth. It would be better if the residents of Portsmouth had this site left as parks / city farm / nature reserve. Money isn't everything. You can't live on money alone. Biodiversity is very important for a habitable planet. At present 200 species are dying out every day. Let's try and slow this down and put a halt to our demise.

### **Portsmouth Society**

Agree that the two sites should be considered together and believe that considerations and constraints identified in the document are comprehensive and potentially helpful to developers. Pleased that constraints related to the Hospital Building itself i.e Grade II Listed, and requiring a conversion scheme, have been pointed out and we are glad that a conservation audit of the building and grounds is to be undertaken. Also, that attention has been drawn to tree preservation orders and the need for schemes to be sensitive to leafy green spaces as well as the need for an ecologic survey.

Suggest that a Community Land Trust might be encouraged for the affordable homes on the site. Information on the commercial use of Listed Buildings ought to be provided.

### **NHS Property Services**

NHS Property Services Ltd (NHSPS), own the freehold of a significant part of the St James' Hospital site. The remainder of the site is owned by Solent NHS Trust.

The background to the Council's consultation is the site's planning history, saved Local Plan policies and the earlier Site Allocations consultation in 2013:

- the site has been the subject of a number of planning permissions for its development, including residential and healthcare development on the eastern part of the site and residential development on the site's Locksway Road frontage around Forest Lodge;
- the saved (and extant) Local Plan policies MT3 and MT4 allocate the eastern part of the site for a mix of healthcare and residential development (with up to 170 homes) and permit the re-use of the main grade II listed building for a variety of purposes, including residential; and
- the earlier Site Allocations consultation sought to promote the residential development of the former Light/Gleave Villa and Harbour School/CDC sites to provide new homes.

We welcome the proposal to allocate the land that we own at St James' Hospital for about 370 new homes. The land identified in the document is, or will become, surplus to the NHS requirements and available for development in two phases:

- the land and buildings in phase 1 will become available in 2015; and
- the land and grade II listed buildings are likely to become available in 2016/17.

We think that the phase 1 land could accommodate about 100 new homes.

We think that the land and buildings in phase 2 are most suited to residential use and development. In particular it will be important to find a viable new use for the grade II listed main building and residential use is likely to be most appropriate. Although the grade II listed building could be converted in a number of ways to provide new homes on the site, it has a GIA of approximately 18,500 square metres and we think that the Council's assessment that phase 2 is capable of accommodating about 235 new homes is reasonable.

We recognise the importance of considering the whole site's development in a comprehensive manner, particularly when considering access and transport, and are therefore in the process of developing a masterplan. We do not however think that a masterplan is a pre-requisite to the submission of a planning application for the residential development of phase 1. A planning application for this site could be brought forward independently of the second phase of the site's residential development. The requirement for an overall masterplan should therefore be encouraged rather than a pre-requisite for determining a planning application for phase 1. We do however agree that any planning application for the phase 1 site's development should consider the impacts of the wider site's development (and the University site's potential development (although no timescale is indicated in the document for that site's development)) on, for example, traffic and transport in the area.

### **Open Space**

Although we acknowledge the need to protect the cricket pitch from development and to retain it as an open space, we object to the allocation of the land around Forest Lodge as "open space" in the proposed allocation. This area is separated from the cricket pitch by a driveway and has previously been granted outline planning permission for the development of 8 terraced houses and 14 flats (A\*34719/AD; Granted September 2002). The principle of this site's development has therefore previously been established through the granting of an outline application for its residential redevelopment, and that the site has not historically been the subject of open space policies, and is not currently used for this purpose. Although there are currently no proposals in respect of the services provided in Forest Lodge, the land around it should not be allocated as open space. We therefore request that this area of the site be removed from the open space designation in the Further Proposed Site Allocations draft.

### **University of Portsmouth**

UoP strongly supports the continued allocation of the Site for residential development. This is consistent with UoP's own assessment of an appropriate alternative land use once the accommodation and other Campus facilities have re-located.

UoP also supports the expanded Site boundary for the Allocation. This reflects the ownership boundary of the Site and the potential developable area. In this regard, UoP supports the recognition given in the Allocations Document to the potential for reconfiguration of the present land uses on the Site. This offers an important level of flexibility to UoP in formulating an appropriate development scheme for the Site.

We note in the Allocations document a stated preference for "Houses and some flats". UoP supports the identification of these forms of residential development, as it reflects their expectation of the potential form and mix of scheme that could be delivered. The term "some" does however imply that flats will be a lesser proportion of the total number of residential units. This preferred mix does not appear to have been thoroughly justified or tested at this stage. In order to provide the policy allocation with an appropriate level of flexibility, we recommend "some" is deleted from the eventual detailed policy.

This will then allow the final form, mix and type of residential development to be examined, tested and justified.

UoP note in the Allocations document that it is anticipated that the Site could accommodate 110 dwellings. This figure is derived from the 2013 SHLAA. The actual developable area and capacity of the Site has not been completely assessed by PCC as part of this Plan process or by UoP. The Site therefore has the potential to provide an additional number of dwellings, subject to assessing the impact on the protected Open Space and Ecological designations and wider infrastructure. To ensure the opportunity presented by the Site is recognised in the Plan and importantly is positively prepared, we recommend that any eventual policy either allows for a potential increase in units and developable area or does not impose a cap on the number of units. We acknowledge this would need to be subject to demonstrating compliance with Open Space and Ecology policy requirements and other material considerations. This can be undertaken as part of a planning application in any event.

UoP note the Allocations document anticipates the scheme being delivered within 11-15 years. Subject to UoP identifying relocation sites(s), there is the potential for the Site to be delivered in earlier phases than this specified period. We therefore recommend that adequate allowance is made for an earlier timescale in an eventual policy, as provided any scheme is appropriately justified, there is no reason to withhold earlier releases of the Site.

UoP note the expectation that the Site is 'best planned' with the SJH site in the context of an overall masterplan. PCC's intention is understood and we acknowledge the importance of a comprehensive approach to scheme layout and assessing impact. There does however need to be a degree of caution applied to the masterplan approach, based on the differing timescales for delivering each site; the multiple ownership; and differing challenges presented by this sites. Insisting on such an approach may consequently have the effect of creating additional uncertainty and delay for both sites.

To overcome this and still achieve a co-ordinated approach to development, we recommend that future versions of the Allocations document include the following:

- Detailed yet flexible policy wording which outlines the potential highways, design and infrastructure requirements for the Sites both individually and collectively. This will offer clear guidelines on how a site is to be brought forward individually and to complement wider development taking place.
- Such a policy should encourage each land owner or developer to consult with each other in formulating a scheme. The steps taken to achieve a scheme that relates to its surroundings (both existing and planned) should then be clearly presented and justified in the eventual planning application.
- A requirement for Impact Assessments submitted as part of a planning application to consider the development capacity and potential of the adjacent Allocation. This will ensure a clear and transparent approach to identifying and planning site / area specific infrastructure impacts and contributions. The stated requirement for the SJH Traffic Assessment to take into consideration the Site's allocation is supported as an interim measure in advance of the formulation and adoption of such a policy requirement.

The use of these measures would then remove the requirement for a comprehensive masterplan based approach for both sites, while acknowledging that this could be considered as the preferred option.

We note that PCC is preparing an Education Needs Assessment. We would be grateful if a copy of the final Assessment and recommendations could be issued to us once it has been published.

### **Milton Neighbourhood Forum**

Despite the many meetings at which details of the above proposal to vary the 2013 Site Allocations Strategy have been presented, I and the residents of Milton, remain unconvinced it is necessary to include the University Playing Field and the St James Cricket Pitch in the Site Allocation Strategy Document. These are valuable local assets which have an essential function in the locality by offering feeding grounds to protected species, helping to maintain a wildlife corridor and offering healthy recreation to many local people who reside in cramped streets in other parts of the city.

We request that these sites are excluded.

Further, these 2 sites are not included as development sites in the Portsmouth Plan. In the City's Portsmouth Plan approach to a green and healthy city document, it is stated that "*the key points of the Portsmouth Plan approach to a green and healthy city are*

- *protecting the limited amount of green space we have and enhancing it wherever possible*
- *taking every opportunity to provide new green space*
- *working to tackle the health inequality in the city.*

*The environment in which people live can impact on their health and wellbeing in many ways. High quality parks and open spaces have a number of social economic and environmental benefits from providing opportunities for social cohesion and biodiversity to promoting healthy living. High quality green spaces are not simply desirable but essential to the city's*

*continued development"*

Why is the green space in Milton, suddenly excluded from these policy statements? It feels like an unjustified political move.

We also remain totally unconvinced of the need for housing to be built on the St James and university sites. We believe that the City Plan permits other uses such as educational or health use here and that these should be pursued much more energetically and effectively to demonstrate that our council is a responsible body acting in the interests of existing Council Tax payers.

We believe that the Harbour School in which the Council Tax Payers have invested should remain in this location and that there should be a transfer of land to the city. Many sites previously owned by establishments such as the former Teacher Training College at Furze Lane have simply transferred over to the Polytechnic and then University, why cannot sites be transferred back when the NHS no longer needs them?

Our reasons for advising you that the proposal for such a high number of houses on these 2 sites is unacceptable and impractical is that the proposal cannot be defended as a sustainable one. Sustainable development is development that meets the needs of the present, without compromising the ability of future generations to meet their own needs. ie it has no highway problems, traffic issues, lack of health facilities, lack of schools. This cannot be said of Milton.

Our area is already suffering from

- Insufficient school places in Milton
- Very congested roads as we need to use the city's trunk roads Eastern Road and Rodney Road, as local roads to get about the city. The Velder Avenue junction is currently at 1.3% over capacity which will rise to 5.4% with Tesco opening in 2015.
- The threat from continuing high air pollution levels at Velder Avenue where the Air Quality Measurement Station has shown no reduction over the past 5 years.
- Southern Water made a huge outflow of raw sewage only 2 weeks ago following heavy rain and it is acknowledged our sewers cannot cope.

In the immediate future it will be suffering further from

- Impact of 200 new homes being built in St Mary's Hospital which will share the same major accesses in Velder Avenue, Milton Road, and Rodney Road.
- Tesco development with 579 parking spaces plus large scale delivery lorries and internet delivery vans will be using the local roads 24 hours a day

The principal of sustainable development may be acceptable in cities set in countryside which can offer land for future expansion for these facilities but I argue coastal cities such as ours, which is in fact an island with no spare land, that the development being proposed here will prejudice future generations as there will be no land left to provide these essential services.

There is a huge wealth of wildlife on the St James site. It has breeding foxes, hedgehogs, squirrels, birds not found anywhere else on Portsea island such as Jays, woodpeckers, owls and has a population of bats for which a breeding roost and summers roosts have just been provided following the demolition of Light Villa, under licence. The local homes immediately adjacent to the hospital site enjoy visits from these creatures, but they do not stray any further. St James is an enclosed site large enough to sustain their existence there and building on the site will remove their habitat.

The large mature trees on St James are necessary to take up ground water and provide oxygen for this city. Without the open land, there will be more run-off and flooding for the city to cope with and the sewage system must be at breaking point due to the unauthorised overflows every time we have heavy rain and it is not just rainwater which is discharged straight into a harbour alongside the marina berths and water sports area.

The local roads were never designed for the level of traffic they take. Local people in Lockway Road do not open their windows facing the road now, due to noise and fumes.

The UK is currently failing to meet European air quality targets. How will more homes, more cars and nowhere for them to get out onto a creaking road network help the country and the city achieve these standards? Cycling down Lockway Road is hardly an option due to all the parked cars.

The City will have to bring in considerable traffic calming measures along this road to allow the 20mph to be adhered to. It is likely too that Residents Parking will be needed in the Lockway Road area to free up roadspace just to allow people to get around.

Views of local people have been sent to Cabinet when this proposal was first aired, 150 local people attended the last

Neighbourhood Forum Meeting to express very clear views against the development and very many people have taken the time and trouble to write to tell you what they, the residents of this area, would like to see on these sites. It is not unsustainable development. We ask our elected representatives to reflect the views of local people and resist the housing, the number of housing, the allocation of existing protected open space into the site allocations and find better and more acceptable uses for these sites.

### **Royal Society for the Protection of Birds (RSPB)**

Many thanks for the additional time to respond to the Development Sites in Milton consultation.

As explained at our recent meeting with the Council, Natural England and the Wildlife Trust, the RSPB is seriously concerned about the individual and combined impacts of the increased new housing proposed for Milton on the internationally protected wildlife sites in the surrounding area.

As you know, this part of the City is particularly sensitive for wildlife; bounded by the Langstone Harbour SPA to the east, and additionally surrounded on the landward site by a large number of brent goose and wader sites. The ability to demonstrate that these features can be protected from the effects of the proposed new housing will be critical to the Site Allocations Plan passing its Habitats Regulations Assessment, and for the individual applications to do the same.

We are particularly concerned about the proposed additional allocation of the St James's Hospital site, which, combined with two earlier nearby allocations, now totals 370 new houses across the wider site. Individually, and in combination with the other remaining allocations in the area (in particular the Langstone Campus site and the proposed coastal path around Eastney Lake), this extended site will place considerable pressure on important wildlife sites in the surrounding area.

Reliance on the Solent Recreation Mitigation Partnership (SRMP) Strategy alone will not be sufficient to protect the SPA from the recreational effects of the Milton schemes, and considerable further assessment of localised impacts (including local visitor/household surveys) and further local mitigation measures will be necessary to support these applications.

As discussed at our recent meeting with you and the other nature conservation stakeholders, we are seriously concerned that it may not be possible to demonstrate that suitable mitigation (including, for example, the potential to increase both recreational capacity and enhancement for SPA birds at Milton Common without impacting on existing wildlife interests) will be deliverable, before the submission of the Site Allocations Plan. Therefore, by including this new allocation, we consider the Plan is in serious danger of being found unsound.

Due to these uncertainties, we object to the allocation of St James's Hospital for 370 new dwellings. However, we consider that a significantly reduced allocation could potentially be deliverable under the Habitats Regulations, were it to allow the creation of more substantial open space within the site, thereby diverting at least some of the pressure for dog-walking and other recreational needs away from other sensitive sites in the area.

In addition to a significantly reduced allocation for St James's Hospital site, we consider that the proposed coastal path around Eastney Lake should also be removed from the Plan, and further policy provision put in place to ensure no net loss of habitat and no increased disturbance to the brent goose feeding resource at the Langstone Campus Field, which is now also proposed for formal inclusion within the Langstone Campus allocation site boundary.

I hope these comments are helpful, and thank you again for taking our views on board after the consultation deadline.