



# MILTON NEIGHBOURHOOD PLAN EVIDENCE

<b>Executive Summary</b> .....	1
<b>Foreword</b> .....	3
<b>Our Vision</b> .....	4
<b>Our Aims</b> .....	4
<b>The Milton Neighbourhood Plan Area</b> .....	4
<b>How the Plan was Prepared</b> .....	5
<b>Community Engagement</b> .....	5
<b>The Population of Milton</b> .....	7
<b>Deprivation</b> .....	8
<b>The development and character of Milton’s housing</b> .....	9
<b>National and Locally Listed Buildings</b> .....	13
<b>Housing Needs Analysis</b> .....	15
<b>Employment and Retail</b> .....	15
<b>Education</b> .....	18
<b>Health</b> .....	19
<b>Adult Social Care</b> .....	20
<b>Infrastructure</b> .....	21
<b>Air Pollution</b> .....	26
<b>Community Facilities</b> .....	30
<b>Local Green Space Designation</b> .....	31
<b>Coastline</b> .....	34
<b>Coastal Area Special Designations</b> .....	38
<b>Coastal Conservation and Conflicts</b> .....	40

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# Executive Summary

Neighbourhood plans enable a community to positively shape its growth and to add value within the context of local plan-making. We want to create a sustainable environment for the benefit of existing and future residents, businesses and landowners. It is planning for future development to enhance the Neighbourhood.

Portsmouth is already the most densely populated city in England. Portsea Island, by its very nature, is a finite resource.

The pages on the development and character of Milton describe how the patterns of development of the area have evolved over time. Development in Milton over the past two decades has, in contrast, been piecemeal and has seen increases in family housing on land that previously provided a source of employment. Together, these two factors have increased the volume of traffic commuting along the Eastern Corridor and has burdened residents with increased levels of air pollution from traffic congestion. This has also increased stresses on the remaining recreational green spaces and threatens the harbour's conservation objectives. The responses from residents to questions on their Neighbourhood indicate how much the coastal and open nature of Milton is still valued.

The persistence of high levels of air pollution mostly from road traffic has required the Leader of the Council in March 2019 to request from the Secretary of State for Environment a relaxation of housing targets to mitigate further environmental degradation and harm to local residents. Indeed on 19th March 2019 Portsmouth City Council declared a "Climate Change Emergency" to initiate a zero carbon emissions target by 2030 in recognition of the scale of the problem

Against this increase in housing, there has been little meaningful infrastructure improvement to support this new development. This has compromised accessibility to local medical and education facilities and increases the pressures on the open spaces that we have left. It is vital that any new development addresses these issues, at the same time as harmonising with the green spaces rather than overwhelming them.

This plan is the first opportunity to achieve these aims.

At its heart is the use of social capital as a tangible and intangible measure of human wealth. Tangibly, it is manifested in the open spaces, parks and the public facilities that our Community has created for the common good. Intangibly, it is about the relationships these have with the health and well-being of our Community.

The re-use of the St James' Hospital and Langstone Campus sites are at the forefront of the Plan. These are the areas where we want to have a positive influence on future development.

The Grade II Listed Hospital, and its grounds have much potential for community centered re-use. Bespoke conversions would be attractive to our elderly residents looking to downsize from under-occupied terraced housing. In turn, this will give a younger generation access to relatively more affordable housing and reduce the need for new build.

The plan area lacks a GP Surgery and this could be located within the former Hospital. A further health care function could be for Adult Social-Care accommodation which would address a projected growing need in the city.

The mature parkland landscape provides a wonderful opportunity to integrate development in and around the Listed Building, taking their design cues from the Hospital itself.

For Langstone Campus, we believe social capital can be increased by continuing to use the

site for education purposes. We know that within the plan period Portsmouth will face a school places deficit and the absence of a Secondary School in the south-east quadrant of Portsea Island is obvious. This can be addressed by building a Through-School for 4-16 year olds. The site is also well placed to offer environmental studies with the potential to enhance the future student intake of the University.

The city has a poor record on obesity and cycle safety. This Plan can be an exemplar for a Portsmouth wide modal shift away from an over-reliance on motorised transport in favour of walking and cycling. The Plan will support the expansion of walking and cycling routes within the area and cycle parking and storage are to be embedded in any new developments. The new Portsea Island Coastal Defence Scheme is a huge opportunity to extend longer distance cycling opportunities separated from traffic congestion

This Plan will encourage new designs affording the greatest opportunity for public access to the mature woodland character of the site and all roadways will adopt the principle of shared-space.

This completes the circle of fulfilling our Vision of a Sustainable Community whilst simultaneously preserving the necessary open-space consistent with the requirements of the Special Protection Area for the benefit of the common good.

This Plan is both thoughtful and ambitious, but primarily it is an attempt to embrace a more environmentally, socially and ultimately economically sound approach to spatial planning and land-use.

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# Foreword

Welcome to the **draft** Neighbourhood Plan for Milton, outlining a way forward for our area for the next 15 years.

Milton is an attractive place to live with much to enjoy including the Common, the Shore-line, Milton Market, the Village Hall, Milton and Bransbury Parks, the Beddow Library and the allotments. Its community spirit is one of the best in the City. We have a lot to be proud of and a lot to preserve.

There is pressure on the area to accommodate more development. We need a Neighbourhood Plan which will encourage development that meets the needs of residents, is benign on the local environment, wildlife and on our health and well-being whilst being economically beneficial to landowners and the City in the long term. We want to encourage development contributing to a sense of place which adopts high-quality designs in keeping with what already exists.

Too many residents and young families cannot afford a decent home. Our local population is ageing and requires more of the National Health Service and more in terms of specialised housing. We cannot travel freely, especially at peak times and weekends, and the chronic traffic congestion is compromising air quality and damaging our health.

We have two main sites for future development here in Milton, St James' Hospital and Portsmouth University's Langstone Campus. This long-term plan includes policies for these sites dealing with the major issues facing our area and our City; providing homes for all ages, families, single people, senior citizens and those with supported-care needs, school-places for children and preserving and enhancing the green spaces, whilst protecting the Internationally Designated Langstone Harbour. This **draft** plan tries to meet these objectives.

Volunteers who care about the future have put it together. It's a community vision formed out of consultation, evidence, and a shared experience and a desire to improve Milton's future.

Rod Bailey  
Chair Milton Neighbourhood  
Planning Forum

Janice Burkinshaw  
Chair Milton Neighbourhood  
Forum

# Our Vision

The following vision guides the plan:

The Milton Neighbourhood Plan aims to reflect the wishes of the residents and provide an environment that helps create a sustainable community where social, economic and environmental imperatives are properly considered. That is a community where families can grow and can access their services locally. It should be an area where children can play, walk, and cycle safely; where a family, across generations, can be accommodated and where green spaces and the historic environment can be retained and enhanced.

To achieve the vision, the plan has the following aims.

## Our Aims

- A. To promote and balance the social, economic and environmental wellbeing of the area.
- B. To meet the needs of current and future generations, including a range of housing, employment and community facilities.
- C. To preserve and enhance the character of the neighbourhood and create well-designed and sustainable places.
- D. To conserve and enhance the area's natural, built and historic environment.
- E. To promote adequate provision of infrastructure.

The policies of this plan have been formulated to deliver the vision and aims.

## The Milton Neighbourhood Plan Area

The Milton Neighbourhood Plan area is located in the south-eastern quadrant of Portsea Island in the Portsmouth City Council Local Authority Area. Milton is 1.4 miles east-west and north south. It is 2.7 miles from the centre of Milton to the City Centre. It is 1.7 miles from the nearest railway station (Fratton), and 3.2 miles from ferry links to Gosport, the Isle of Wight and Portsmouth International Port.

The Milton Neighbourhood Plan will form part of the statutory development plan for the area, together with The Portsmouth Plan, (Portsmouth's Core Strategy) January 2012. Planning applications must be determined in accordance with the statutory development plan, unless material considerations indicate otherwise.

The plan covers a period of 15 years from **(exact dates to be added)**.

The neighbourhood plan will be monitored by the Milton Neighbourhood Forum during its 5-year period of legal force. Consideration will be given to reconstituting the neighbourhood planning forum, to give it a longer-term role, beyond that set out in planning legislation. Consideration will be given to revising the plan, if necessary, in response to changes in national policy, local policy or other considerations.

This neighbourhood plan has been prepared to meet the Basic Conditions set out in planning legislation. These are:

- Have regard to national policies and advice
- Help to achieve sustainable development
- Be in general conformity with the strategic adopted local policies for the area.
- Be compatible with EU obligations

In addition, we have had regard to the need for neighbourhood plans to be compatible with human rights legislation.

The vote to leave the European Union does not affect the Basic Conditions regarding EU obligations in the short-term.

The Neighbourhood Plan has been prepared with local stakeholders in Milton (residents, businesses, landowners and other organisations). It aims to ensure that Milton remains a distinctive, vibrant and sustainable settlement.

## How the Plan was Prepared

The idea of a Neighbourhood Plan for Milton emerged out of a presentation from the then Department of Communities and Local Government, organised by Penny Mordaunt MP, on such plans to some local residents and a Councillor in December 2014. This arose after pressure from Janice Burkinshaw, the Chair of the Milton Neighbourhood Forum, and Rod Bailey, who subsequently became the Chair of the Milton Neighbourhood Planning Forum (MNPF).

Following this, starting a Neighbourhood Plan was raised at a public meeting of the Milton Neighbourhood Forum in February 2015 and a group formed to discuss setting up the MNPF immediately thereafter.

The Planning Forum prepared an application for formal designation including framing a constitution and a proposed area. This was submitted to Portsmouth City Council (PCC) on 30 March 2015. The consultation closed six weeks later and the Milton area was designated a “neighbourhood area” by PCC on 23 June 2015. The Milton Neighbourhood Planning Forum is the body authorised to develop the neighbourhood plan.

The Planning Forum set up working groups to oversee input on individual parts of this Plan. These covered demographics, community infrastructure, transport and design. These groups and the Forum Committee have distilled the data from the consultations outlined below into this draft plan.

## Community Engagement

The following is a summary of key engagement activities:

- **March 2015:** [www.miltonplan.org.uk](http://www.miltonplan.org.uk) set up to let people know more about the Plan.
- **June 2015:** stall at Picnic on the Green to gauge specific issues people wanted to raise in a Plan.
- **Autumn 2015:** surveys of residents and businesses in Milton sent out and put online for people to respond. A Residents’ survey was also inserted into the Neighbourhood Forum’s regular magazine, Milton Matters. People could respond online and by dropping off surveys at accessible points across Milton.
- **December 2015:** survey response deadline extended to February 2016 to help deepen engagement with ‘hard-to-reach’ groups. Contact made with Portsmouth College to increase take-up among young students locally in February 2016.
- **April 2016:** Open Day held at Milton Village Hall on 5 April 2016 to present the survey results, update local people on the Plan’s progress and give them a further chance to give their ideas for the future of Milton. More than 200 people attended.
- **June 2016:** Open Day was presented at a Picnic on the Green stall.

- **March 2018:** Open Day held at Milton Village Hall to present progress on the plan and consult with local residents. Draft plan put up on website for comment along with supplemental reports.

In addition, the Neighbourhood Plan has been a standing item at all public meetings of the Neighbourhood Forum since 2015. This involves presentations and responding to audience questions.

## Stakeholder Engagement

There have been many meetings with key stakeholders between July 2015 and now. These have helped shape this Plan. These stakeholders include:

- Portsmouth City Council's Planning, Adult Social Care, Education, Highways and Transport Officers and the Senior Officer responsible for reducing air pollution in Portsmouth's Environmental Health Department.
- Local elected representatives, including both MPs and all six councillors
- Natural England
- Portsmouth University
- NHS Property Services
- Portsmouth Hospitals NHS Trust
- Homes England, formerly the Homes and Communities Agency.

The Forum and Stakeholders have received and commented on three consultations from the Homes England Consultants on their ideas for St James' and Langstone Campus.

The Forum and Stakeholders have also participated in 2 workshops to discuss principles of development across both major development sites.

In preparing the Strategic Environmental Assessment (SEA), statutory consultees have been asked for their opinion in line with national practice.

## Issues identified from consultations

### ***Residents' survey:***

- The three topics that mattered the most for their quality of life are a friendly and safe environment, parks and open/green spaces and protecting local wildlife and habitats, including Milton Common
- They felt that local doctors', dentists and the sewage/drainage system would not meet their future needs. People felt there were not enough health and tourism-related businesses
- 82.8% of respondents were worried about traffic congestion. 61.9% were worried about parking
- The biggest number of respondents wanted St James' to be used for healthcare and Langstone campus to be used for education. Significant numbers wanted each site used for recreational purposes
- There was opposition to large-scale housing development
- The greatest support for housing was for supported housing for the disabled, homes for older people and semi-detached/terraced properties

### ***Business survey:***

- Most business owners live within Milton and their demand comes from in Milton

- Most have less than 10 employees. Most of them live in Milton and are able to walk to work
- The biggest constraint on them is availability of parking and the road network
- They felt the Plan should support educational, health and retail uses
- 

### ***April 2016 Open Day***

- Respondents, who attended on the day, wanted to have healthcare at the St James' site and for the Langstone campus, recreational use, followed by healthcare

### ***March 2018 Open Day***

- Respondents, who attended on the day, confirmed that their earlier views on the future development of their area had not significantly changed.

## **Key outcomes from consultations**

- **There is a strong preference for development at St James' and Langstone to include healthcare and educational uses, as outlined in the 2012 Portsmouth Plan**
- **Local people want to preserve the 'green' nature of Milton**
- **There is a strong preference for any housing development to focus on people with disabilities and older people**
- **Any housing should be in keeping with the sort of semi-detached and terraced housing seen throughout Milton**
- **Any major development should include healthcare/medical and sewage/ drainage facilities. It should also not exacerbate parking and congestion issues**

## **EVIDENCE**

### **The Population of Milton**

Census data shows the proportion of people in the 16-24 and 25-44 categories in Milton is lower than local and national levels, while the number of people in the 45-64 and 65-84 age brackets is noticeably higher.

There has been a change in the age structure between the last two censuses. The 25-44 age bracket increased by only 0.7% compared to the larger increases at local and national levels and across other age groups. This indicates young families are being priced out of the housing market. The proportion of those aged 65-84 increased significantly compared to Portsmouth; however particularly significant is the comparatively higher increase in the 85 and over age group compared to national level.

### **Household Composition**

Census data shows the overall average household size in Milton (2.48) remains higher than the local and national levels (both 2.4). However, the average household size in Milton over the inter-census period has decreased by 0.5%, whereas the household size in Portsmouth has increased by 1.2%.

Milton has experienced a decrease in the number of persons per room; this contrasts with the increase in persons per room experienced at a local and national level. This would suggest that Milton experiences a higher level of under occupancy compared local and national levels.

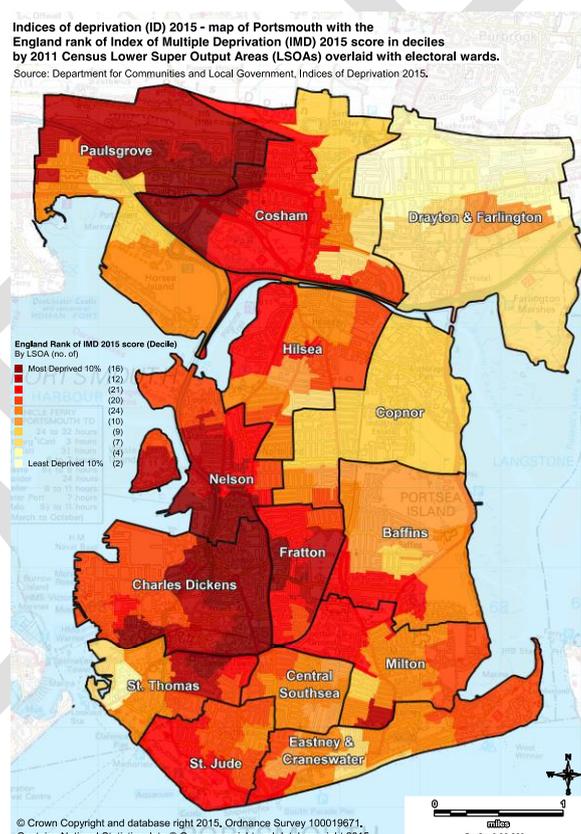
The proportion of one-person households in Milton is slightly lower than the local level but higher than the national level. The proportion of older (65+) one person and one family households in Milton is also higher than the local and national averages.

Milton has experienced a 10.3% increase in one-person households, higher than the 6.2% increase for Portsmouth. This would indicate demand shifting towards smaller housing, both for older households who wish to downsize, and to house the growing numbers of people living on their own.<sup>1</sup>

## Deprivation

Portsmouth is one of the 20% most deprived districts/unitary authorities in England and about 24% (8,800) of children live in low income families. Life expectancy is 9.8 years lower for men and 6.0 years lower for women in the most deprived areas of Portsmouth than in the least deprived areas.

Indices of deprivation indicate that, compared to Portsmouth as a whole, the Neighbourhood Plan area has some areas of increased deprivation. These are clustered around the southern and eastern border areas, as shown in map 1 below. The effects of deprivation are well



Map 1: Portsmouth Deprivation Map

documented and result in lower mortality, lower educational achievement, fewer and poorer life chances and decreased social mobility. Particular problems in Portsmouth are premature deaths related to smoking, and poor air quality, and dense traffic resulting in more road deaths and serious injuries.<sup>2</sup>

<sup>1</sup> AECOM HNA August 2017

<sup>2</sup> Public Health England Health Profile 2017 for Portsmouth 4 Jul 17

The intent of this plan is to give some balance to the area and to improve, where possible, factors that can have a bearing on health and mortality. By seeking to retain and designate green spaces, not make air quality any worse, promote health use and re-use of buildings, we aim to make opportunities to improve the effects of deprivation.

## The development and character of Milton's housing.

Understanding the development of Milton is key to understanding why residents think of the area as a good place to live, work, and raise a family.

The low-lying islands and 'bottleneck' harbours that characterise the landscape of the NE corner of the Hampshire Basin are the inundated remnants of the massive Solent River's flood plain. The drift geology a mix of flinty marine and valley gravels and clay, cover Tertiary age strata. From the south, they are Bracklesham Beds, London Clay, and Woolwich and Reading Beds, Milton is situated largely on the London Clay. The clay has proved highly susceptible to marine erosion and prior to infilling the shoreline was characterised by creeks, inlets and salt marsh.

Outside of recent research on the rapidly eroding islands of Langstone Harbour there have been just two prehistoric find spots on Portsea Island. One at St Mary's Hospital but the second and more important a middle Bronze Age hoard discovered in Milton at St James Hospital. The first mention of Milton dates to 1186 although the name Middletun is an Old English name 'middle farm', perhaps a reference to its location between Eastney and Fratton.

A 1585 map detailing the placement of Armada warning beacons marks the settlement of Milton and De la Fabvoillière's 1665 map, itself a redrawing of 1625 survey map for Charles I, marks Milton Common Pasture. (image 1)

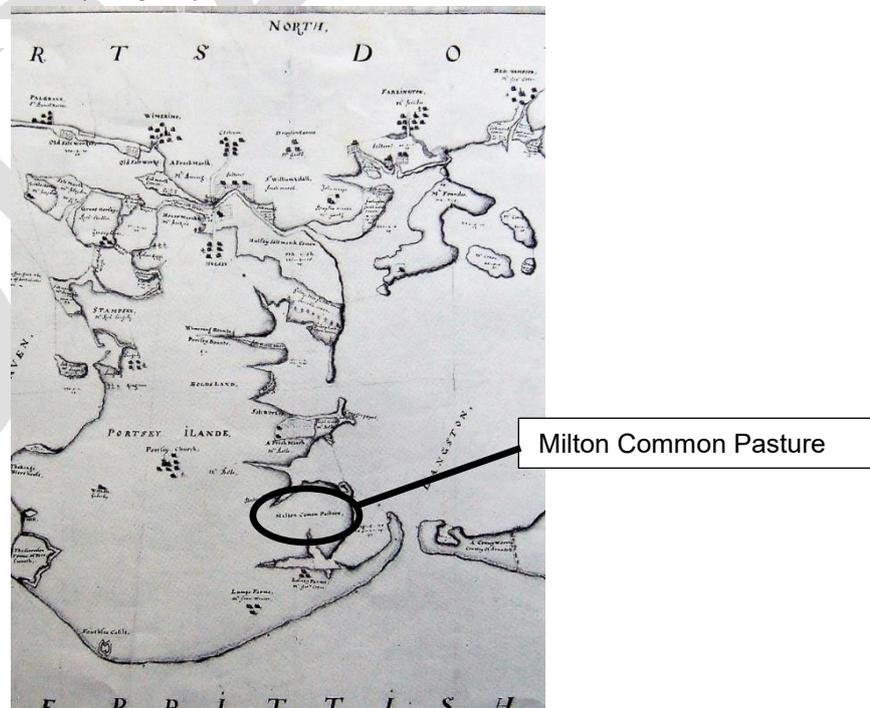


image 1: De La Fabvoilliers Map of 1665 showing the first recorded mention of Milton

For much of its history access onto the island was via the Portscreek Bridge. Once on the island the lane ran due south down the central spine of the island it was along this lane that the small agricultural village of Milton developed. Two streams drained into the harbour via Velder Creek and Eastney Lake. They fix the north and southern extents of the settlement respectively. To the west there are no natural boundaries, the fields of the Milton farms butting

up to those of neighbouring Fratton. As part of an ambitious scheme to connect Portsmouth to the capital a canal was dug east from Portsea to Langstone Harbour. Entering the SW corner of the plan area its course marked the southern boundary (Goldsmith Avenue) until it was bridged by the Milton Road. Here the boundary turns south to follow the road and complete the boundary circuit on the southern watercourse. The canal was opened in 1821 but sea water percolating into the water supply was so serious a problem that the company was forced to drain the canal and it closed in 1831. It was not completely backfilled at the time and remained a landscape feature and influence on the layout of the plan area.

## **Milton Village**

Milton remained rooted in its agrarian past until the early 20<sup>th</sup> Century. The Royal Dockyard was responsible for the development of housing in Portsmouth to the north and west, but farming remained important. The first St James Church was completed in 1843. Previously, parishioners would have travelled north to west across farm land to worship at St Mary's, now in Fratton. The church was known affectionately as the 'runaway church' as it soon became a popular venue for couples who wanted to marry in a more intimate setting than the overcrowding and poverty of Portsea. The population of Milton was growing, albeit slowly, and it could support a small school to the north of the parish but the photographic record from the 1890's still captures an agricultural community within an industrialised city. (image 2) From 1898 and culminating with the death of Jimmy Goldsmith in 1911, the farms of Milton were sold off and the village was rapidly subsumed by the rows of terraced properties that now characterise much of Milton's built landscape.



*image 2: 1890s photo showing early patchy development*

## **Terraced Grid Development**

The canal was eventually infilled in 1896 and made roadworthy as far as Milton Road. Two years later Fratton Park (home of Portsmouth FC) was built on a market garden site and housing spread south and east. A decade later Jimmy Goldsmith sold part of Gomer Farm and terraces infilled the land west of Milton Road and north of Priory Crescent. On Milton Road (Eastney Road) A.E. Cogswell built the locally listed Milton Park Primary School and south again three rows of shops known as Milton Market. A century later, they remain at the heart of the community

From 1911 land north of the canal land was opened to the speculative builder whose temporary brick kilns utilising the local clays sprang up across the fields. Constructed from the west and largely complete by 1914 long straight terraces run north from Locksway Road to Warren Avenue and as far east as the boundary walls of St James Hospital. These streets form the core of Milton but their design shares much in common with earlier terracing in the locality (image 3)



*image 3: Terraced streets showing distinctive development*

## ***Inter War Housing***

After the war, the economy had stalled and the dockyard workforce was largely redundant and therefore little to incentivise private development. The state funded 'Homes for Heroes' campaign, placed a duty on local authorities to provide working class housing. PCC rose to the challenge and by 1921 had completed the terraces and built a new street at the head of the creek. By design these houses replaced their Victorian canted bays with a more cottagey style. In neighbouring Eastney the Henderson Road estate saw a clear articulation of the Garden City Movement ideal. By the 30's this ideal had become too expensive to maintain but the spirit remains in the Salterns Estate of 1934 built on a prominent location overlooking Langstone Harbour and the busy wharfs of Velder Creek. The estate was self-contained, the lozenge shape curtilage had a cruciform axis that allowed for short runs of terraces with back and front gardens. The rear extension, which had typified the urban terrace was replaced to ensure that the back of the house received as much light as the front. (Image 4)



*image 4: Inter war social housing showing distinctive development*

In the late twenties suburban Tudorbethan style houses typified by square double bays, tile hung and topped with timber framed decorative gables were built. Similar dwellings spread east beyond the Edwardian houses on the south side of Locksway Road and in Trevis Road (W) Ironbridge Lane (E).

## ***Reconstruction post Second World War***

The 1950's saw a programme of inner city slum clearance and to address this, on an already overcrowded island, PCC built larger three storey blocks along the Langstone Harbour shoreline fronting the Eastern Road. Each apartment had their own balcony, and were set in communal grounds set back from the road. Of a similar date, Broom Square estate lay to the east of the hospital, built around a square with a mix of three and four storey apartments and houses with garaging included as part of the scheme. (image 5)



image 5: Broom Square Estate showing later development style

## ***Reclamation***

The largest reclamation exercise saw vast amounts of the city's Second World War rubble used to infill Milton Lake behind bunds stretched from the north shoreline of Milton Common to Kendall's Wharf. It has taken the name of Milton Common and is now a Local Nature Reserve.

## ***The St James' Hospital Estate***

By 1965 the hospital farm had been wound down and the land sold off for new housing. Comprising two parallel streets Godwit Road and Moorings Way curved around the former shoreline that faced into Milton Lake. Outline permission was given to develop the hospital playing pitches in two phases. This permission was overtaken by a proposal for the whole estate to include a hi-tech business park, the conversion of the hospital to a hotel and the building of a new hospital. The plan was rejected because it was felt that the existing infrastructure could not cope.

Phase 1 was delayed until 1997, constructed west from Edenbridge Road a mix of two and three bed two storey semi-detached and terraced houses with associated garages and off-street parking. Phase two, followed as a continuation of Edenbridge Road. Anticipating further development Lapwing Road gives access to the hospital's Light and Gleave Villa site. From 2017 Crayfern Homes are delivering two and three storey buildings, a mix of two three and four bed houses along with two one bed flats. The same developer built a small estate of three storey four bed and two storied three bed houses on the former 'Skillploy' site north of the hospitals service block. Off the Locksway Road the Fair Oak Estate was built in 2004 and here 47 dwellings in a mix of two and three storey houses nestle against the edge of the hospitals parkland. Since 2000, the St James' Hospital site has yielded 349 new family homes.

## ***Later Brownfield Development.***

Four brownfield sites have become available for redevelopment. In 1984, 39 houses with 11 garages and car parking was built on the site of White & Newton Furniture Factory. In 1996 the large corner site of University Business School was the subject of a proposal to demolish and redevelop as a supermarket. That plan was rejected and in its stead a three-block

residential scheme, comprising a three storey and a four-storey block which flank, at right angles, the seven-story centrepiece of Admiral House that dominates the Milton Road streetscape. (image 6)



*image 6: Admiral House dominating streetscape*

Completed by 2006 the complex provides 154 flats with associated parking. The former council depot and the East Shore School was redeveloped in 2003 here two four storey gateway blocks with pointed hat roofs provide 42 flats, behind, a mix of two and three storey staggered terraces and semi-detached houses which provide a further 51 units. In 2012 the Linnington's Garage site on the junction of Alverstone Road with Milton Road was developed for a total of 76 one and two bed retirement homes built over four stories.

All four brownfield sites, St James hospital and the University's Langstone Campus were sources of local employment. They have been replaced by housing, the occupants of which will have to commute away from the area to find employment. The census returns reveal that local reliance on the car is increasing and the question must be asked if further housing in the area is compliant with the sustainability that underpins the National Planning Policy Framework.

When we look at the development of Milton's housing, we can see that the piecemeal development of Milton, especially in the last 20 years, has not been planned with the interests of Milton residents. The lack of investment in infrastructure to support new development is marked with many everyday facilities being placed outside the Plan area. Development in penny packets does not facilitate a more holistic view of the area, nor address the lack of suitable infrastructure and community facilities.

## **National and Locally Listed Buildings**

Within the Milton Neighbourhood Plan area, the following buildings are nationally listed or locally listed as buildings of importance:

### *Nationally Listed*

#### **ST JAMES HOSPITAL**

Grade II St James Hospital and attached Piers and Lamp Posts. 1878. By George Rake in a Byzantine Gothic style, the Borough Asylum, built on symmetrical box plan with projecting wings. Red brick in English bond, stone dressings. Steep pitched Welsh slate roofs, brick stack with oversailing brick capping to left and right of main entrance block, to centre and right of left block, to centre and left of right block and to left, centre and right of each projecting south facing block. Later Victorian additions by AE Cogswell.

Grade II St James Hospital chapel. 1879. By George Rake Early English style 5-bay nave, 1 bay apsidal chancel, south-west porch and west bellcote, north vestry. Knapped flint with stone dressings. Welsh slated roofs.

Grade II Sea Lock and Basin. 1823. Probably by Josias Jessop. Red brick in English bond. Roach bed Portland stone dressings. North and south walls have 2 narrow recessed panels at east and west ends, which housed gates and posts. West end has curved wall on each side at entrance to basin. Stone rusticated quoins and deep coping stones at ground level. East projection into Langston Harbour is foreshortened, late C20. Sides of basin recently partially restored. This is the only surviving section of the Portsea Canal. It is also a Conservation Area.

Grade II St James Church 1913 Anglican Church designed by John Oldrid Scott, in a Decorated Gothic style, brown brick laid in English bond with red brick and stone dressings. The upper walls are faced in flint with chequerwork to the aisle parapets. Clay tile roofs to nave and chancel. Stained glass of 1933 depicting the Tree of Jesse, designed by Ninian Comper. Replaced smaller Neo-Norman church of 1841 by A Livesay remains of which are in the grounds.

### *Locally Listed*

#### **MILTON ROAD**

Barn, Milton Park 1800/1850 Thatched barn - probably once part of Middle Farm, now converted into a theatre with modern extension.

#### **EASTNEY ROAD**

Milton First and Middle Schools. 1905 Prominent school buildings by A. E. Cogswell, red brick with stone dressings and red tile roofs. Lower parts to north and south flank the main central section. The main section has a central pediment flanked by smaller pediments. The rear elevations are simpler. A lower single-storey school building fronts Perth Road.

#### **GLASGOW ROAD**

1-16 & 25-32, Friendly Society Homes 1915/1930/1936 Red brick ground floor, first floor roughcast render, red clay tile roofs.

#### **LOCKSWAY ROAD**

1 & 2, Old Engine House 1821 of three stories with 2 feet thick walls the former pumping station for Portsmouth & Arundel Canal which is now a private house. The tall, narrow shape of this building set back from the road discloses its origins as a beam engine house, engine room at ground floor accommodation above accessed by external staircase. It is rendered with replacement windows with glazing bars, & concrete tiled roof with valley.

#### **MEON ROAD**

Meon Valley Public House. 1929 Public House with red glazed brick ground floor with windows with 'United' lettering, green ceramic tiled fascia, rendered first floor, clay tile roof.

#### **SHIRLEY AVENUE**

Old Canal Public House. 1931 Public House with 'United' green glazed brick and tiled ground floor, red brick first floor, red tiled roof.

## Housing Needs Analysis

A Housing Needs Analysis is mandated on all Neighbourhood Planning Groups to assess local needs and AECOM, a company engaged by the Ministry of Housing, Communities and Local Government (MHCLG) have conducted one for Milton Neighbourhood Planning Forum.

Because of Portsmouth's unique Island setting and its significantly higher population density than anywhere else in England and Wales excepting some London Boroughs, the Housing Need must inevitably be qualified by capacity and environmental constraints. Indeed, AECOM confirm in their Strategic Environmental Appraisal (SEA) the importance of balancing biodiversity, avoiding increased air pollution levels and mitigating climate change.

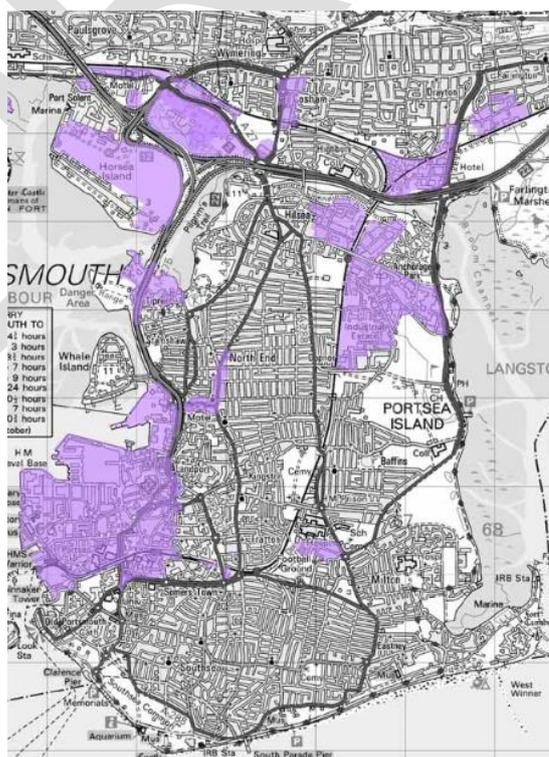
The relevance of AECOM's housing research is more pertinent to the mix of housing than quantum.

AECOM highlighted that there are insufficient homes of 3 to 5 habitable rooms, and that young families are being priced out of the market. An entry level property in Milton is valued at £154,222, which requires an income of £44,063 to purchase a figure which excludes roughly 70% of the local demographic.

Milton experienced a 10.3% increase in one-person households, indicating demand shifting towards smaller housing, both for older households who wish to downsize, and to house the growing numbers of people living on their own. A 1 bedroom flat priced at £105,000 is unaffordable to those on an income lower than £30,000.

The Strategic Environmental Appraisal (SEA) also draws attention to Milton's higher than average housing and population expansion since the 2001 Census which came at the expense of loss of local employment, stress on school-place provision, local health-care provision and green infrastructure.

## Employment and Retail



Map 2: Employment areas - PCC map

## Employment

It has not been possible to breakdown employment figures solely for Milton. Within the Plan area, the major employment areas are the Warren Road Industrial Area, St James' Hospital, and the University. Other than the local shops, there are no other opportunities for employment in the Plan area, as can be seen from map 3. Most other employment necessitates driving out of the Plan area, increasing traffic.

With the closure of St James Hospital for the most part, and the declared intention of the University to close the Langstone Campus, there will be a shortage of local opportunities which will impact on opportunities for employment, unless alternatives are provided. We are proposing a re-use of buildings on the St James Site, which should provide both short and long-term employment prospects.

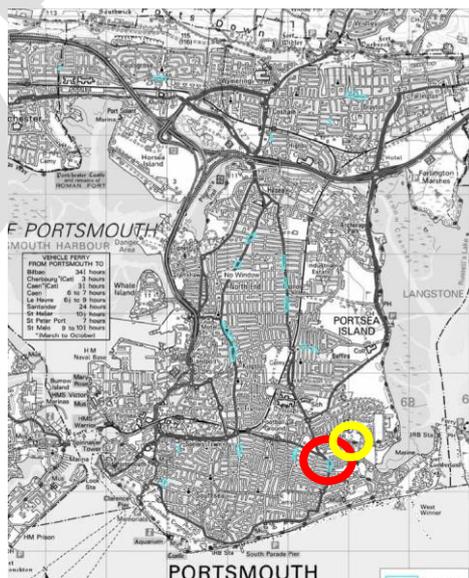
National Online Manpower Information System (Office for National Statistics; UK) (NOMIS) data shows that Portsmouth has higher than average employment in Soc 2010 Major Group 6-9 Occupations than the norm in Great Britain.<sup>3</sup> Additional information can be found in the Partnership Urban South Hampshire Economic and Employment Land Evidence Base Paper of May 2016<sup>4</sup>.

The employment rate in Portsmouth is 73.1%, below that of Hampshire at 77.8. Nationally, the rate is 74.2%, so Portsmouth is showing a deficit against regional and national figures. As can be seen from the employment areas map (map 2) and the shopping areas map (map 3), there are few local opportunities for employment in the local area.

## Retail

Milton Market represents the primary retail area with the Neighbourhood Plan Area. It runs along both sides of Eastney Road from Milton Park Primary School going south to the junction with Devonshire Avenue. (map 3).

The market currently comprises 37 retail units - a mix of retail provision including two supermarkets, a green grocer, post office, sweet store, two pharmacies, two betting shops, hairdressers and five food outlets/cafes.



Map 3: PCC map of district shopping centres (note Milton Market outlined in red, Locksway Road in yellow)

<sup>3</sup> <https://www.nomisweb.co.uk/reports/lmp/la/1946157284/report.aspx?town=portsmouth>

<sup>4</sup> [http://www.push.gov.uk/item\\_10\\_annex\\_3\\_economic\\_\\_\\_employment\\_land\\_evidence\\_paper.pdf](http://www.push.gov.uk/item_10_annex_3_economic___employment_land_evidence_paper.pdf)

The only other retail provision within the Plan area is on Locksway Road (photo 1) which is a small strip of shops, including a newsagents, general store and Post Office, hairdressers, and two takeaways.



Photo 1: Locksway Road Shops

## **Retail Need**

Milton Market is currently a thriving local high street with an active traders' association who host an annual Halloween event, a Christmas event, and are looking to host more in the future. As a high street, it has been hit by the loss of the local bank being situated there but traders have responded accordingly and a loyal customer base means that most retailers continue to do well.

Further information on retail need can be found in Portsmouth City Council's Scrutiny Report into 'Revitalising Local High Streets and Secondary Shopping Areas' <http://democracy.portsmouth.gov.uk/documents/s7563/EDCL%20Scrutiny%20Report%20%20Revitalising%20local%20high%20streets%20and%20secondary%20shopping%20areas.pdf>

## **Maintaining Balance in the shopping centre**

It is crucial that the current balance of different uses is maintained. Specifically, planning permission cannot be granted for any new betting shops or any new food outlets within the defined boundaries of Milton Market.

UK retail betting shops show a continued decline with the growth of internet and mobile offerings satisfying this leisure activity. The neighbourhood plan area is already served by 3 betting retail shops:

- Bet Fred - Eastney Road
- Ladbrokes - Eastney Road

All parliamentary parties are in agreed communication with regards to the socio economic and family issues contributed by what are known as fixed odds betting terminals (FOBTs). There are a number of groups and UK media organisations driving campaigns to either remove FOBTs in their entirety (unlikely) or reduce the maximum stakes per play (likely) of these machines. This is a stance supported by the local newspaper 'The Portsmouth News' and the two MPs representing the Neighbourhood Plan Area. We believe the supply of 2 retail outlets is more than enough supply for the neighbourhood plan area. In the last 5 years there has been no request from any gambling operator to add another retail outlet into the area. This is due to the demand already being met by the current 2 operators.

All parliamentary parties and the cross-party Local Government Association are agreed as regards the harm and anti-social behaviour that fixed odds betting terminals (FOBTs) can cause. This has become an issue of growing national concern and a successful campaign has reduce the maximum stakes per play. This may further reduce viability and lead to shop closures.

Further studies on the potential harm can result from an over provision of takeaways, particularly near schools, can be found at <https://www.local.gov.uk/sites/default/files/documents/tipping-scales-case-studi-bff.pdf>

The additional housing growth recognised in this neighbourhood plan will increase the catchment for the retail area and for other community facilities, helping to enhance their viability.

## Education

### *Local need*

The Neighbourhood consultation survey showed the local people overwhelmingly prefer the option of education for the Langstone Campus/Furze Lane site. 331 of 375 respondents chose education in their top three preferred land uses for the site. Concern over schools' capacity and a preference for new school site has also been expressed by a local head teacher.<sup>5</sup>

Portsmouth City Council has predicted a rising shortage of school places from around 2023. Additionally, PCC is aware of, and planning for an increasing number of Special Education Needs and Disabilities (SEND) places that are required in the City.

The 'emerging' Portsmouth Local Plan to 2034 designates St James & University of Portsmouth Langstone Campus as one of 5 strategic sites for the city for housing & development. There is no mention of either site (especially University of Portsmouth) as a possible option for education use whereas in the current Portsmouth Plan, education is one of the potential options for the future redevelopment of the site.

Currently the Council's strategy for meeting additional demand for school-places is by extending existing schools at the expense of losing playground and open space which may explain Portsmouth's higher than average childhood obesity levels. This strategy is acknowledged as a short-term fix and even the Council's long term planning is only up to 5 years. Furthermore, it assumes the biggest expansion will be at Portsmouth Academy where the outdoor sports pitches are situated adjacent to Fratton Road in Portsmouth's worst air pollution corridor<sup>7</sup>

The education department uses a comprehensive mixture of data to predict future number of pupil numbers. However, the Director of Childrens' Services has reported to the Education Committee on 9 March 2017 saying "Many of the city's secondary schools are on constrained sites and many of the 'quick wins' had already been exhausted".

The fundamental issues with Pupil Place Planning on a 5-year basis in relation to the emerging Portsmouth plan are:

- The data only runs to 2023 but the emerging plan is for a period expiring in 2033
- The methodology ONLY includes APPROVED planning applications and the CURRENT shortfall is based on known applications as of summer 2017. We estimate this to be an under-provision of circa 300-400 places over the plan period.

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<sup>5</sup> Letter from Head teacher, Meon Infants School, to Chair 21 Mar 2017

- The 2800 housing target from the 5 strategic sites listed in the emerging Portsmouth Plan.
- Any account of the Partnership for Urban South Hampshire (PUSH) housing target of 14k (minimum) to 17k (maximum) by 2033.

The City has limited potential areas for building new schools. The University grounds at Langstone Campus are an ideal site for the future, away from traffic pollution in a part of the City not best served by schools and where alternative land-uses are in any case constrained (see section on Coastal Conservation and Conflicts).

Currently, the university site has no allocation, only an existing use. Furthermore, a single use housing allocation would significantly enhance the land value and potentially place too great a burden on the Department for Education, effectively removing the opportunity for this to be considered as a site for a new school.

## Health

There are currently no General Practitioner (GP) surgeries within the Milton area. This therefore highlights a gap in GP provision for the Plan area. Identified future development sites are likely to increase the number of people living in Milton. The Portsmouth Clinical Commissioning Group's (CCG) 20/20 Vision Priority One states "We want everyone to be able to access the right health services, in the right place, as and when they need them." The demand for GPs appointments continues to grow in Milton with an ageing elderly population. For this to be truly achieved for the Milton area, the elderly population needs to be able to access a local GP surgery within a short walking distance.

Almost half of all the deaths in Portsmouth are caused by heart disease, stroke, cancers and respiratory conditions. Heart disease is the most common cause of all early deaths. Too many people have poorer health and wellbeing than in other similar cities. Chronic obstructive pulmonary disease (COPD) is the 4<sup>th</sup> most prevalent cause of death in Portsmouth. Portsmouth also has one of the highest rates of excess winter deaths. Poor air quality resulting from traffic fumes is generally accepted to be a contributing cause, with approximately 95 – 100 premature deaths per year.<sup>6</sup>

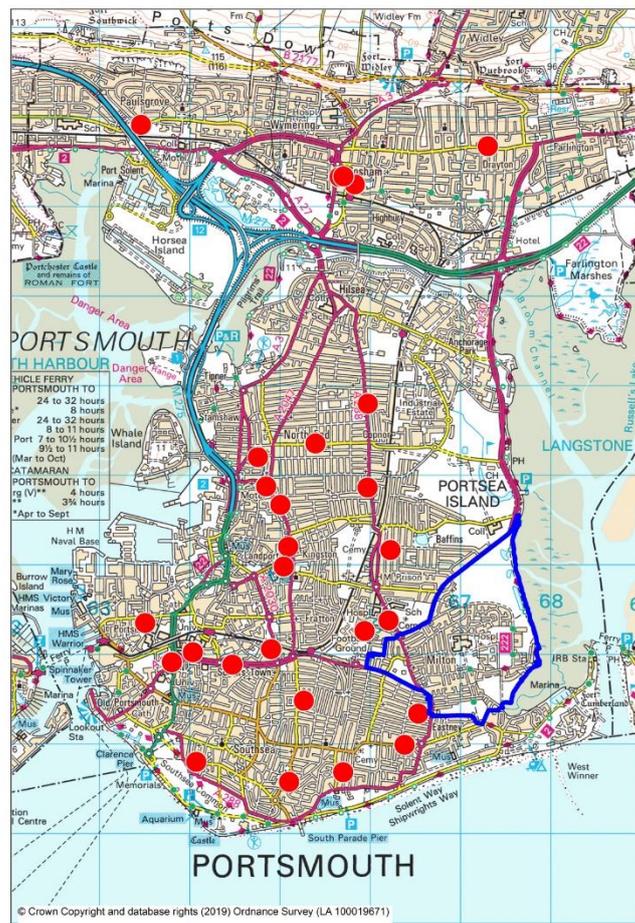
The Portsmouth and South East Hampshire system is already under considerable strain in keeping up with demographic growth and increased levels of demand. Portsmouth Hospitals Trust (PHT) continues to bear a great deal of the burden. This is evidenced by an inability to deliver the A&E 4 hour standard and in the ability to discharge medically fit patients, due to lack of capacity in the community. At the present time, the Trust is unable to deliver the national RTT (18 week) standard, due to capacity and financial constraints. Bed capacity is routinely in excess of 95% providing limited flexibility at peak pressure points, and requiring the Trust to access additional capacity (at a premium cost).

Any additional demand in the system, which will occur because of further development, will result in evitable further deterioration in local waiting times for elective treatment unless an additional investment in capacity is made.

Department for Transport figures have shown that Portsmouth has consistently had some of the highest number of cyclists killed and seriously injured outside London, while Public Health England in its child health profile of Portsmouth June 2015 states that the rate at which children and young people were killed or seriously injured in road traffic accidents in Portsmouth is higher than the England average. This indication of the dangers associated with the City's

<sup>6</sup> Public Health England, various web pages 2017

persistent failure to address the obvious conflict between the heavy reliance on the private car and active modes of transport is recognised by the City’s prominent joint 4<sup>th</sup> place in the most congested Cities in England (see also the section on Road Network and Congestion on page 24<sup>7</sup>



Map 4: Location of surgeries and approximate plan area

## Adult Social Care

Adult Social Care is provided by PCC for some 6,000 people in Portsmouth. Milton Village, in the Neighbourhood Plan, area provides some 65 places for across the City. With an increase in elderly population in the plan area which already exceeds the average for Portsmouth, we would like to make provision in the Plan for that need. AECOM, in our HNA, suggested that the population of the over 75 could increase by 443 persons in the plan period. Their suggested provision is below:

“Provision of additional affordable, market sheltered and extra-care housing units is appropriate in the following numbers: 27 conventional sheltered housing units; 54 leasehold sheltered housing units; 9 ‘enhanced’ sheltered units; 14 extra care housing units for sale; 7 extra care housing units for rent and 3 specialist dementia care home.”<sup>8</sup>

PCC’s Adult Social Care department has provided figures which seem to indicate that the need may be lower, but, with only 243 units available in 2017, there is a shortage of Extra

<sup>7</sup> [www.portsmouth.co.uk/news/travel/portsmouth-named-as-most-dangerous-place-to-ride-outside-London-1-7628557](http://www.portsmouth.co.uk/news/travel/portsmouth-named-as-most-dangerous-place-to-ride-outside-London-1-7628557)

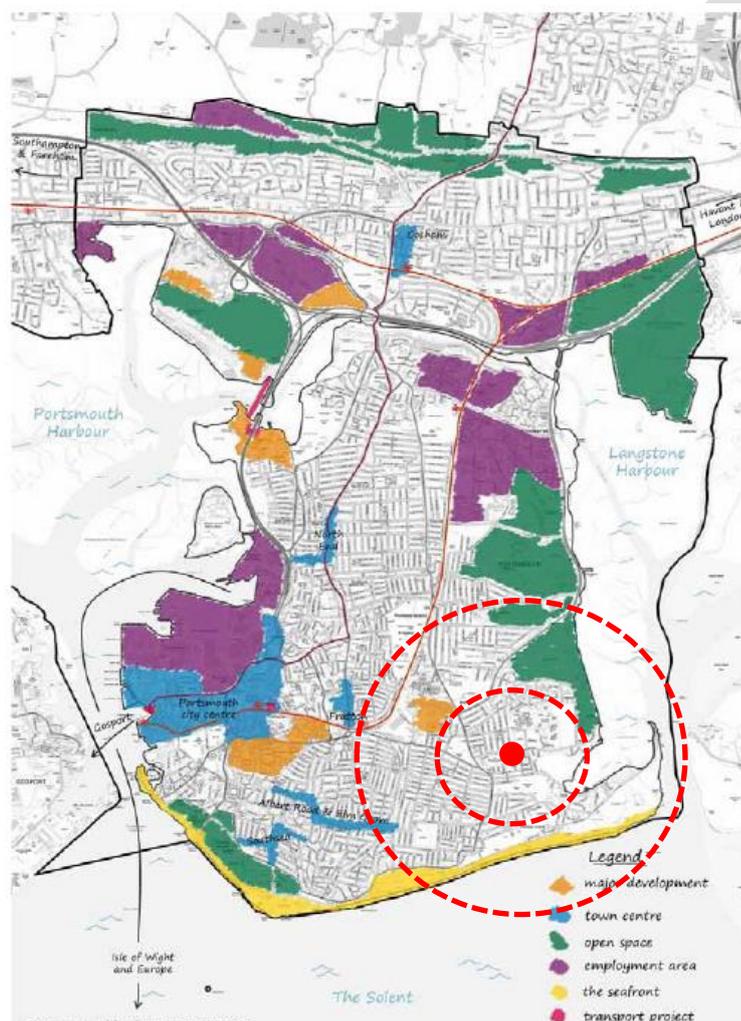
[www.portsmouth.org/media/1200/childhealthprofile2015-portsmouth.pdf](http://www.portsmouth.org/media/1200/childhealthprofile2015-portsmouth.pdf)

<sup>8</sup> AECOM HNA Aug 17 Final Table 2, page 14

Care accommodation in the City. The Housing LIN tool suggests that the number of units we should have had in 2017 is 348 units. Currently we have 30% fewer units than the tool suggests. By 2030 this tool suggests that we should have 495 units

With our growing numbers of older people and an expanding growth in the numbers of those over 85, there is a need to ensure that informal carers, families and friends, who are often now also older people themselves, are afforded appropriate advice and support so that they can continue to contribute to the care and support of their relatives and friends. It seems prudent to allow for this sort of use in the St James' or Langstone area.

## Infrastructure



### Rail Network

There are no railway stations located in the Neighbourhood Plan Area. The nearest station, Fratton, is located approximately 1.7 miles to the west, with storage spaces for one hundred and ten bicycles and parking space for sixty-six cars. This station is accessible via the A2030, which navigates along the northern and western boundaries of the Neighbourhood Plan Area. The majority of direct services to the capital from Fratton terminate at London Waterloo station, with regular daily services (three to four per hour) taking approximately one and a half to two hours. Additionally, there is a service terminating at London Victoria station, with one direct service per hour.

There are direct services to regional and national destinations including Brighton, Bristol, Cardiff and Southampton, with the regularity and journey times listed below.

- Destination: Brighton; Regularity: two services per hour (two of which are direct); Journey time: approximately one and a quarter hours.
- Destination: Bristol and Cardiff; Regularity: hourly service (between the times 0608 and 2131); Journey time: approximately three hours.
- Destination: Southampton; Regularity: three services per hour (two of which are direct); Journey time: approximately forty minutes to an hour.

## **Bus Network**

In regard to the bus network, as of September 2017, there are a variety of services navigating through the Neighbourhood Plan Area, connecting residents to the city centre of Portsmouth, with the following services, operated by First Bus, stopping along the following main streets within the Neighbourhood Plan Area, amongst others:

- Eastern Road: Route 13
- Locksway Road: Route 13,
- Milton Road: Routes 2, 17
- Moorings Way: Route 13

Additionally, the transport hub at Portsmouth Harbour, known as The Hard Interchange, is approximately 3.2 miles to the west of the Neighbourhood Plan Area. Residents have access to a variety of services to national destinations, operated by National Express and Megabus.

## **Road Network and Congestion**

The National Infrastructure Assessment of July 18 listed Portsmouth as the 4<sup>th</sup> most congested City outside of London. Southampton is its joint partner, but unlike Portsmouth, it is introducing active measures to reduce congestion and pollution through a clean air charging regime. The predicted growth in the City's traffic is 41% between 2016 and 2026<sup>9</sup>

The A2030, Eastern Road, a key route on and off the island passes along the northern and western boundaries of the Neighbourhood Plan Area, connections to a network of A Roads navigating around Portsmouth. Locally, traffic issues exist along Eastern Road and Milton Road. Image 7 illustrates the queuing along the Eastern Road prevalent at peak times.

The traffic laden A288 that runs through Milton is constrained within a footprint that was only ever intended to reach the tiny village of Milton before terminating on the seashore. The morasses behind the shingle foreshore meant that there was no access west to Southsea and Portsmouth. In the 1930's a road was built extending from Velder Creek north, dubbed the road to nowhere, it serviced the short-lived Portsmouth Airfield. When the Luftwaffe bombed the Ports Creek Bridge the road was hastily extended across the creek. Today the A2030 carries a heavy volume of traffic to and from the east side of the island which bottlenecks on reaching Milton.

The Milton community is concerned with traffic capacity onto the island, which is based around three access points. In addition, there are frustrations with traffic congestion and fears on air pollution. This was reflected in comments from local residents in 2015 and local businesses in the Plan survey where the following points were made:

### **Residents survey responses:**

need for good transport links and safe pedestrian routes were highlighted (Q3) main roads and public transport (Q4) traffic congestion 86% (Q4) concerns about future development

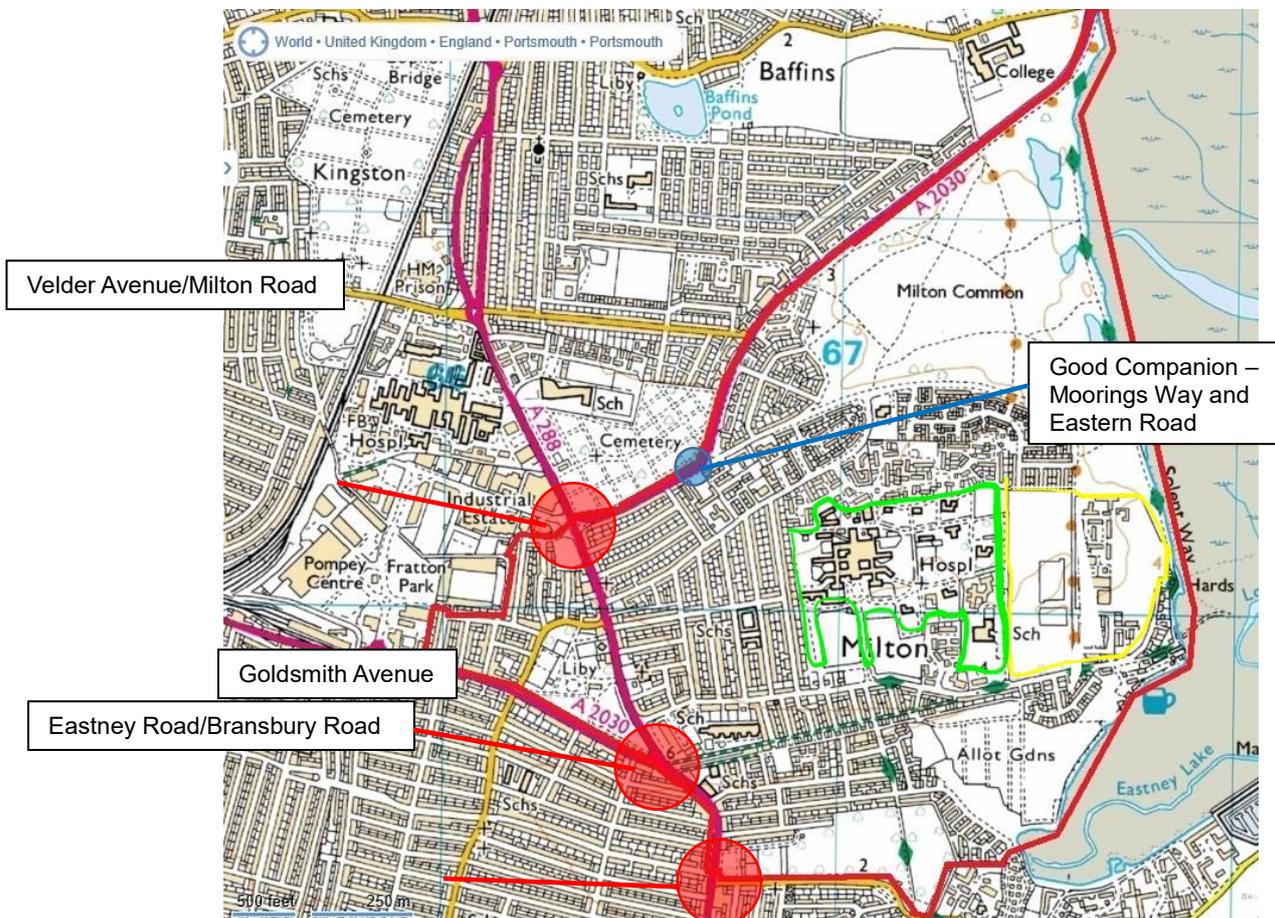
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<sup>9</sup> PCC Traffic, Environment and Community Safety Panel 2 Nov 2016

generating more traffic (Q10b) driving being the main mode of transport to get around Portsmouth (Q12).

**Business survey responses:**

The main means of staff getting to work for local businesses (bus Q6), availability of parking and quality of the road network (busQ7) transport problems (busQ13)



Map 6: Road Junction congestion showing proximity to St James (green)' and Langstone Campus (yellow) sites

The Local Transport Plan (PCCLTP3) 2015/16<sup>2</sup> highlighted 8 pockets of severe congestion at peak times within Portsea and the MNPf area includes 3 of these, shown in red on Map 6.:

- Velder Avenue/Milton Road. (see also image 8)
- Goldsmith Avenue.
- Eastney Road/Bransbury Road.

The three congestion points to the North, the South and the West of the Plan area together with the restricted junction at the Good Companion PH with Moorings Way to the East (in blue on map 6) mean that the Plan area is constrained in terms of vehicular access. These constraints were also recognised in the 2015 Residents and Business survey responses (see Milton Plan Survey responses).



*Image 8: congestion on Velder Avenue*

The new Tesco Superstore in Fratton Way, immediately to the west of the Plan area, was completed in 2016. With its 579 car-parking spaces and a petrol filling station, it has increased congestion at the Velder Avenue junction with Milton Road, as has the completion in 2016 of 191 houses at St Mary's Hospital in Milton Road.

The 2019 planning approval for 271 dwellings and 347 car-spaces at the nearby former Kingston Prison will intensify traffic to the immediate north of the plan area. The road junction at Velder Avenue and Milton Road will be directly impacted and the increased congestion will further compromise the area's acknowledged poor air quality.

### ***Availability of Cars and Vans***

The proportion of households with no access to a car or van is 28.2% for Milton and 22.4% for Baffins. These values broadly align with value for England (25.8%), greater than the average for the South East (18.6%) and less than the value for Portsmouth (33.4%).

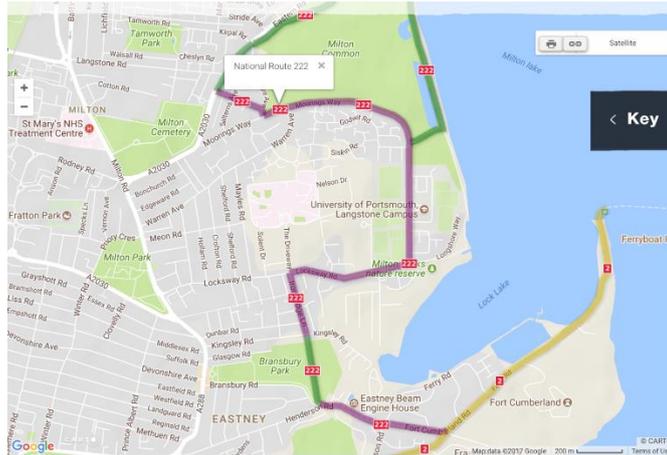
### ***Travel to Work***

The most popular method of traveling to work is by private motorised vehicle 61% for Milton and 68% for Baffins which is higher than the rest of the island 55% (SE Region 70% National 68%). The 2<sup>nd</sup> most popular method of travel is by foot undertaken by 12% and 14% lower than the 22% for the rest of the island (SE Region 12% National 13%). Active travel by bike is undertaken by 11% and 9% comparable to 9% for the rest of the island. (SE Region 3% National 3%)

### ***Cycle and Footpath Network***

The flat topography of Portsea Island lends itself to cycling and walking. The Milton Neighbourhood Plan can contribute to reducing car-dependency by increasing the safe opportunities for cycling and walking by safeguarding and improving the existing network, and by encouraging pedestrian and cycle friendly street design in new developments.

The Solent Way navigates along the eastern boundary of the Neighbourhood Plan Area, with sections of the footpath forming part of Routes 2, 22 and 222 of the National Cycle Network. The Solent way extends along the Hampshire coastline to the west, connecting the Neighbourhood Plan Area to Gosport and Southampton with footpaths. Additionally, there is a circular route around Langstone Harbour, known locally as the "Waterside Walk" (see Coastline section, pages 34-37).



Map 7: Sustrans Cycle Map

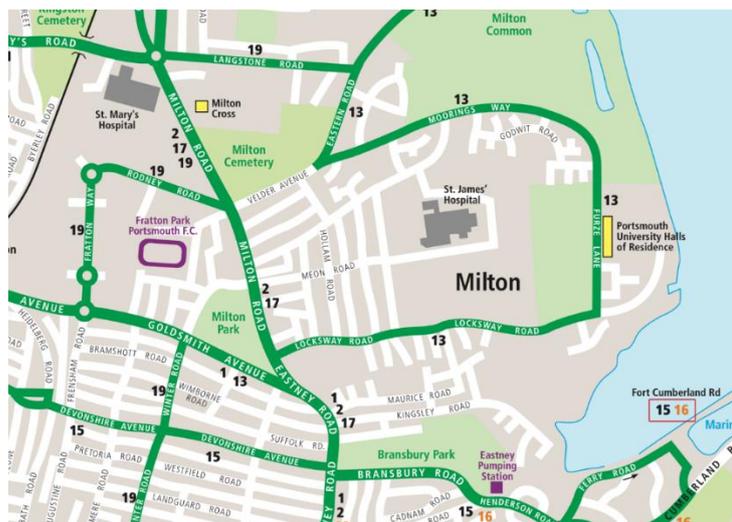
National Cycle Route 222 runs north to south through the middle of the Plan area connecting to National Cycle route 22 at Farlington. Currently it circumnavigates the St James' Hospital redevelopment site making a large detour for users along the busy Locksway Road. (see map 7: Sustrans cycle map). This shared cycle and footpath does not meet National Safety Standards for the section adjacent to the Eastern Road when a cyclist suffered a fatal collision in June 2017.

The 2016 sea-defence improvements along Milton Common have facilitated the adoption by Sustrans of an extension to Route 222. With the congestion on Eastern Road (see photo image under Air Quality below) and the unhealthy consequences of cycling next to it, the Plan will seek to ensure this Milton Common route is extended and Furze Lane is maintained as a Bus and Cycle **Only** Right of Way.

It is also hoped that PCC will reintroduce the shorter waiting times at signalised crossings where pedestrians and children are now severely subordinated in priority terms behind the incessant desire to keep vehicles moving.

### ***Deficiencies in Public Transport Services.***

Public transport should also assist in shifting the bias away from high car-dependency. However, although there is a good bus network (1, 2, 15 and 17) serving the west of the plan area with regular services to Portsmouth City Centre, Fratton mainline railway station and QA Hospital, the central and eastern part of the Plan area where most new development is planned is poorly served by an infrequently operated bus 13. It runs hourly in each direction during the day from 07.32 weekdays, and 08.16 on Saturdays. It does not run in the evenings after 18.00 weekdays, 18.09 Saturdays and on Sundays every other hour in the daytime, after a timetable revision in January 2019, promoted by a PCC subsidy on the service. The service is not timed to arrive in the city centre for normal work starting times but are geared more towards serving Portsmouth College at the north of Milton Common. (see map 8: Portsmouth bus map)



Map 8: Bus routes around the Neighbourhood Plan area

The Council's subservience to the local bus operator's business interests effectively limits the provision of sustainable public transport services outside the City Centre. The Plan can embrace this deficiency by supporting educational uses on Langstone Campus to align with the bus operator's need to serve schoolchildren at the College using the same timetable.

The poor 13 bus service to the centre and east of the plan area prevents sustainable travel for a significant number of residents to Fratton Railway Station where there are good services. All of the above highlight the need for any future developments in the Plan area to not make traffic congestion worse.

For any significant redevelopment, a full assessment should be made of existing highway capacity and the collective impact of development proposals for the site, together with all other approved development on the island. Similarly, air quality should be given proper consideration, especially the impacts of pollution on health and on the area's protected landscapes and habitats.

## Air Pollution

The ability to breathe Clean Air should be a public right. NPPF guidance requires Neighbourhood Plans to consider Air Quality and the potential cumulative impact of a number of smaller developments and where increases in traffic generation are likely.

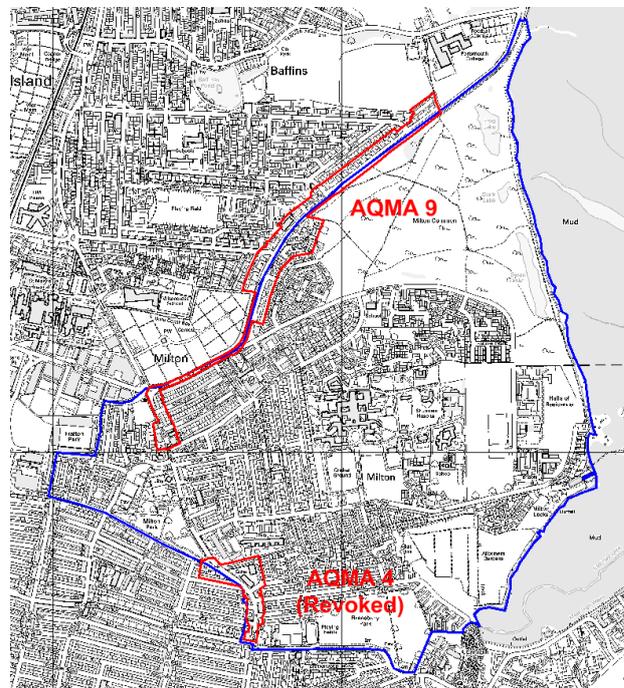
The 2016 Public Health England Annual Report<sup>10</sup> estimates an annual death rate of 100 from the City's polluted air. In 2014, it was 95<sup>11</sup>. The estimated early deaths stated by the Director of Public Health for Portsmouth to the Cycle Forum is 600<sup>12</sup>. We have so far been unable to obtain the increased numbers of inhalers prescribed to children or adults.

<sup>10</sup> <http://democracy.portsmouth.gov.uk/documents/s16325/PHAR%20appendix%20-%20draft%20document.pdf>

<sup>11</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/332854/PHE\\_CRCE\\_010.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CRCE_010.pdf)

<sup>12</sup> <https://acityhtptoshare.org/>

Portsmouth City Council's 2018 Annual Status Report issued in June 2018<sup>13</sup> explains the regulatory framework, where and why the Air Quality Management Areas (AQMA) are designated, the data they have relied on and the Local Air Quality Strategy (LAQS) options to reduce the toxicity. Cars and taxis are, on average, the most significant contributor to annual mean NO<sub>2</sub> concentrations, and the accepted major causal factor in Portsmouth's polluted air is from vehicular emissions. The Milton Neighbourhood Plan includes an acknowledged polluted area, AQMA 9, shown in Map 9



Map 9: Portsmouth Air Quality Areas in relation to Plan area

The National Infrastructure Assessment July 2018 lists the Solent Area of Portsmouth and Southampton as the joint 4<sup>th</sup> most congested Cities in England behind Manchester, Liverpool, and Birmingham but Portsmouth has the highest density of population of any City in England risking greater exposure of its population to harm.

Para 181 of the NPPF says that Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

PCC has been monitoring Air Quality locally at 7 Velder Avenue in AQMA 9 since 2012 and confirms a rising trend in pollution levels notwithstanding their measures to give increased priority to traffic over pedestrians and cyclists (see PCC's 2017 and 2018 AQ Annual Status Reports & PCC's AQ Strategy 2017). In reporting the rising pollution in the 2018, Report PCC announced a 12% reduction (Fig 23 p116). However, that is untrue if the 12-month period was taken between June 2016 and May 2017 when the unadjusted Annual Mean was 40.61µg/m<sup>3</sup> or a mere 2.5% reduction (40.0µg/m<sup>3</sup> is the legal maximum). This reduction could be associated with bridge engineering works closing part of the AQMA route further north and diverting traffic elsewhere.

<sup>13</sup> <https://www.portsmouth.gov.uk/ext/documents-external/asr-2018-web.pdf>

Micro-particulates PM 10 and PM 2.5 are monitored at the DEFRA Urban Background Monitor in the north of the City at Gatcombe Park Primary School. Background PMs are below EU and UK statutory limits but this station is 119m from the road. AQMA 9 has never met the World Health Organisation safe limits since measurements commenced in 2012.

PM 10 and PM 2.5 are monitored at another 2 Automatic Continuous Air Quality Monitoring Stations all within statutory limits but none of these lie within the Neighbourhood Plan area.

The Council is taking no specific measure(s) to reduce PM2.5. According to the PCC, dealing with one automotive related pollutant such as PM10 and NO2 will inherently deal with PM 2.5. The Neighbourhood Planning Forum is surprised at the complacency considering 50% of new cars sold in 2015 were diesel powered.

The mitigation proposed in the LAQS is limited by virtue of the incapacity of the existing highway network and the relegation of Sustainable Transport initiatives to a subservient default option. The view of Eastern Road within the Neighbourhood Plan's AQMA9 (photo 3, below) demonstrates the issue both at weekends and at evening peaks between 1630 and 1830. It is the primary route from the mainland east of Portsea Island to the south and east of Portsmouth including Milton. The photo is taken from the cycle-path where users find breathing is impaired.



*Photo 3: Traffic queuing to enter Portsmouth along Eastern Road. The Queue reaches the Good Companion Public House*

In any event the LAQS is inconsistent with the promotion of walking and cycling initiatives as signalised road crossing waiting times are increased to encourage the continuous movement of motor vehicles. The Council acknowledged the problems of congestion in their Traffic, Environment & Scrutiny Panel meeting of 3 November 2016 when it was stated the volume of traffic was predicted to increase by 41% before 2026.

The Council acknowledged the problems of congestion in their Traffic, Environment & Scrutiny Panel meeting of 3 November 2016<sup>14</sup> when it was stated the volume of traffic was predicted to increase by 41% before 2026.

It introduced an Air Quality & Air Pollution Supplementary Planning Document (SPD) as long ago as 2006. It states: "The Local Planning Authority considers that the planning system has a key role in protecting people from unacceptable risks to their health and in providing an adequate protection to the amenity value of land. It assists developers in identifying what information they may need to submit with their planning applications and it is the developer's responsibility to provide such information on air quality as is necessary to enable the local planning authority to make a planning decision.

As the Milton Neighbourhood Plan will promote Sustainable Development, it is imperative that any potential exceedances of Statutory Limits arising from new development are rigorously

<sup>14</sup> <http://democracy.portsmouth.gov.uk/ieListDocuments.aspx?CId=177&MId=3617&Ver=4>

assessed. Paragraph 1.2.2.2 in the SPD makes it a “Material Consideration” if congestion is likely to be increased.

The Council was unable to satisfy the Neighbourhood Planning Forum that national air quality standards could be complied with locally during the preparation of this Plan (the 2018 Report estimates compliance by 2022 the source apportionment study may not have used the 16% Traffic Growth Factor referred to above.

The Leader of the Council on 13<sup>th</sup> March 2019 wrote to the Secretary of State for the Environment explaining the air pollution around the City was significantly higher than expected and a much wider and more radical plan was required to reduce it. Among the means to reduce it, is a reduction in housing targets in the emerging Portsmouth Plan.

This is after the Ministerial Directive requiring PCC to take additional measures<sup>5</sup> following the third successful challenge by the Charity Environmental Lawyers Client Earth to the UK Government's Air Quality Strategy on 21 February 2018. The Judge's summation is below.<sup>15</sup>

*“It is now eight years since compliance with the 2008 Directive should have been achieved. This is the third, unsuccessful, attempt the Government has made at devising an AQP which complies with the Directive and the domestic Regulations. Each successful challenge has been mounted by a small charity, for which the costs of such litigation constitute a significant challenge. In the meanwhile, UK citizens have been exposed to significant health risks”.*

The Milton Neighbourhood Forum exercised their own initiative to install a Friends of the Earth Nitrogen Dioxide Diffusion Tube Monitor on Milton Park School in July 2017 to establish a “baseline”. The reading indicated 33.17 µg/m<sup>3</sup> for the two-week period which aligns with the monitor at 7 Velder Avenue showing a monthly mean reading of 32.19 µg/m<sup>3</sup>. PCC acknowledges pollution levels are rising near the school but considers the results of the Friends of the Earth Monitor are of insufficient duration. It has, however, commenced monitoring at the School.

The monitor on 7 Velder Avenue is a diffusion tube type on the outside of a two-storey terraced house close to the junction with Milton Road 4.4m from the kerb and 2m off the ground. It lies within PCC's AQMA 9 whereas Milton Park School lies in the rescinded AQMA 4. The Council's new monitor is 5.5m from the kerb and 2.0m from the ground. The absence of the AQMA designation relieves the Council from the obligation to provide a Local Air Quality Action Plan in the vicinity of the School.

The Neighbourhood Planning Forum has requested that PCC reinstate AQMA 4. PCC is so far declining to do so through lack of “forceful evidence” but it has acknowledged the FoE readings “do provide useful additional information”. The Council's July results are omitted from the 2018 AQ Report.

New developments in Milton will increase traffic congestion and a School is described in the SPD as a “sensitive” use.

The MNP's November 2018 Strategic Environmental Appraisal recognises at para 5.5 housing growth proposed through the emerging Local Plan and increases in traffic flows and associated levels of pollutants are likely to contribute to exceedances of the NAQO.

The Neighbourhood Planning Forum is very anxious about promoting development likely to harm residents, and particularly schoolchildren, and hence recommends that Langstone Campus Site be redeveloped as a new “Through School” to provide a safer environment which

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<sup>15</sup> <https://www.judiciary.gov.uk/judgments/the-queen-on-the-application-of-clientearth-no-3-claimant-v-secretary-of-state-for-environment-food-and-rural-affairs-and-others/>

might also attract parents to move their children from more toxic sites such as Priory School and Portsmouth Academy in the centre of the City.

## Community Facilities

Despite an apparent provision of community buildings, heavy usage indicates a lack of suitable meeting space for groups with parking to assist disabled users. Community facilities are also clustered around the southern and western edges of the Plan area, meaning that people have to travel, usually by car, rather than walk or cycle.

Existing community facilities in the area and near to the area are listed below and shown on the proposals map.

Facility
Beddow Library
Eastney Community Centre and Community café
Gisors Road 'Walled Garden' (the former walled kitchen garden of the Goldsmith Farm) which is accessible to residents of the nearby apartments
Langstone Church and Hall with Nursery
Meon Middle & Infants School with Nursery
Milton Park Middle & Infants School with Nursery
Milton Piece Allotments
Milton Village Hall and Pure Ground Community café
Moorings Way Primary School
St James Church (C of E) and Hall
Tesco Community Room
The Barn in Milton Park
United Reform Church and Hall with Nursery

Local green spaces and community facilities further the social wellbeing and interests of the local community. Milton's Assets of Community Value add to this; the table below provides a list of these assets, and their location is illustrated on the proposals map.

Asset	Location
Portsmouth and Southsea Cricket Club	St James Hospital
West Lodge, St James' Hospital	St James Hospital

The presence of a good range of community facilities is essential for the sustainable development in the area. Paragraph 92 of the NPPF states that it is a strategic planning priority to ensure the provision of health, security, and community, cultural and other local facilities, among others.

Sports facilities in Portsmouth consist of the following:

Name	In Plan Area	Has these facilities
Mountbatten Leisure Centre	No	Pool, Gym, Sports Halls, Athletics Track and Sports Pitches
Bransbury Park	Yes	Sports pitches
Charter Community Sports Centre	No	Pool, Gym, Sports Halls, and Sports Pitches
Portsmouth Gymnastics Centre	No	Gymnastics Hall
The Wimbledon Park Sports Centre	No	Sports Hall, Gym

Additionally, ROKO and Goals run football facilities. Both of these are outside the Plan area, although Goals is close. The University of Portsmouth Langstone Campus has sports facilities available for public hire after their own use, but their future is not known.

## Local Green Space Designation

The 2018 open space needs and opportunities<sup>16</sup> assessment noted that generally there were deficiencies in most types of open space around the city compared with national guidelines for the size and demands of the current population but also the projected populations set again the timeframes covered by the new Local Plan. In particular, there were noted to be deficiencies in areas of amenity greenspace, parks, and gardens and natural and semi-natural greenspaces. Notably, these deficiencies all go up as population rises. Deficiencies in green space are an issue because it means that these sites will be under higher pressures from visitors as there is less space to serve the population's estimated needs, it is also a reason for focusing resource into improving the quality of these areas to help address increased demands, as well as creating new areas."

According to PCC's own planning paper, Open Space Needs & Opportunities Assessment<sup>17</sup>, the deficit in amenity green-space is 60% using the Fields-In-Trust guidelines and 77% using PCC's rising to 75% and 80% in 2034 respectively. This is a shortfall of 141ha on the FIT guidelines and 247ha using PCC's methods. In terms of Childrens Play-spaces where the need is for 180 ha using PCC guidelines and 51ha, using FIT but there is a provision of only 14ha. Coastal areas offer a release from the densely developed nature of parts of the city, providing open vistas, undeveloped areas and amenity that is vital to residents and visitors of Portsmouth alike.

The Council commissioned a Playing Pitches Strategy (2018-2022), which was adopted by the Cabinet Member for Culture, Leisure, and Sport on 16th March 2018. There is a shortfall of high quality football provision in the city, particularly 3G pitches, and this applies across the age ranges for the game. The Council is currently working with the Football Foundation to see if there is any scope to attract investment to football in the city through the Parklife funding programme.

There is a theoretical underplay of cricket pitches in the city, but this is projected to reduce significantly over the period of the Local Plan. The key issues for cricket in the city are to protect the United Services Sports Ground in the Portsmouth City Local Plan, and improving the quality of PCC cricket pitches eg protecting pitches and outfielders from dog walkers, providing nonturf pitches for midweek games and junior cricket. Due to land constraints, developer contributions should be used to increase the existing quality of pitches and clubhouses.....

In the feedback for the PCC consultation on their developing plan, a range of views were expressed that related to the natural environment and more specifically green infrastructure in the city. There was opinion that Portsmouth should conserve what it currently has; should stride for biodiversity gain; ensure access to natural environment for all; and work to connect up greenspaces through green infrastructure...., a Green Infrastructure Assessment will consider the potential for other added value for the environment across the city....The analysis highlights that the current direction as prescribed in policy PCS13 has some weaknesses. Going forwards it is suggested that green infrastructure be dealt with in its own specific policy, separate to other equally important matters such as open space provision, and ecological protection, to ensure that each is addressed in the most appropriate manner for considerations that apply to them, though naturally there will be some overlap.

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<sup>16</sup> Portsmouth Plan papers, PCC website

<sup>17</sup> [www.portsmouth.gov.uk/ext/documents-external/pln-local-plan-open-space-assessment.pdf](http://www.portsmouth.gov.uk/ext/documents-external/pln-local-plan-open-space-assessment.pdf)

In its Key Issues for the new Local Plan, PCC planners have stated that there is a need to protect and enhance Portsmouth's unique island city environment, in collaboration with key consultees, through the identification and protection of Portsmouth's ecological networks and identified network opportunity areas.

- Minimising the impacts of development on biodiversity (such as the effects relating to urbanisation, recreational disturbance, climate change and changes to air and water quality) through Local Plan policies, partnership working and other sub-regional strategies, as part of ensuring and promoting the conservation, restoration and enhancement of habitats in Portsmouth.
- Actively seeking biodiversity enhancements and overall net gains for biodiversity in Portsmouth.
- Application of the 'mitigation hierarchy' ('avoid-mitigate-compensate') for development proposals that would result in significant harm to designated habitat sites and biodiversity in the Portsmouth area.
- Appropriate monitoring to measure the effectiveness of biodiversity policy in achieving the above aims.

The Milton area includes local green spaces that require protection to ensure that they remain available for local people and visitors alike to enjoy.

Paragraphs 97, 99 & 100 of the NPPF sets out the criteria that green space must meet in order to be designated as Local Green Space:

97. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

99. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

100. The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

Against the context of the criteria and guidance contained in the NPPF and NPPG, and policy ENV1 on page 54, the following areas are designated as Local Green Space by this neighbourhood plan:

- St James' Green
- Portsmouth and Southsea Cricket Club Ground

- St James' Hospital Grounds East
- Milton Park
- Bransbury Park
- Milton Common
- Edenbridge Park
- Furze Lane Sports-Fields
- Langstone Campus Fields
- Eastney & Milton Allotments

**St James' Green:** This area was saved from over-development in 2002 by local residents and was handed over to the PCC so that it could be maintained as a local park for all to use. This area is particularly valued by the local community as the campaign to protect it was so widespread. The green is now used all year round by local families with their children and dogs as well as being host to the Annual Picnic on the Green event which sees the local community come together to celebrate the park and the area more generally. The site is currently owned by Portsmouth City Council.

**Portsmouth and Southsea Cricket Club Ground:** The St James' site, off of Locksway Road, has been home to Portsmouth and Southsea Cricket Club since the 1980s. The grounds are regularly used for cricket matches and training throughout the year as well as being utilised by local schools to host their sports days. The grounds are currently owned by NHS Property Services and leased to the Portsmouth and Southsea Cricket Club. The Cricket Ground has been designated as an Asset of Community Value (ACV).

**St James' Hospital Grounds East:** This green space has been a part of the St James' Hospital landscaped grounds since 1879. For almost 150 years, hospital patients have been able to access the green area for rehabilitation and leisure. In recent years, local people have also enjoyed access to the grounds for recreation and leisure. There are a number of fruit trees on the site which are utilised by residents every autumn as well as an abundance of wildlife. The site is bounded by Church View to the west, Nelson Drive to the north and Woodlands Walk to the east and south. St James' Chapel is sited in the southwest corner.

**Milton Park:** Previously part of the James Goldsmith estate, Milton Park was bought by the then Portsmouth Town Council in 1912 and made into a municipal park. Today, the park continues to be widely used and includes a children's play area, tennis courts, Skate Park, bowling green and backs onto Milton Village Hall and Beddow Library. The park has a community action group which helps to maintain and enhance the park known as the Friends of Milton Park as well as being home to 'the Barn' which is a locally listed building. The park is currently owned by Portsmouth City Council.

**Bransbury Park:** Previously part of the James Goldsmith estate, Bransbury Park was bought by the then Portsmouth Town Council in 1911 and made into a municipal park. Today, the park continues to be widely used and includes a multi-use gaming area, Astroturf, basketball courts, netball courts, a children's play area, skate park, Bransbury Community Centre and miniature railway as well as forming part of Nation Cycle Network (Route 222). The park is currently owned by Portsmouth City Council.

**Milton Common:** The Common is reclaimed land. It was formed due to tipping in the large area of mud land that was called Milton Lake. Hence the Common is immediately adjacent to Langstone Harbour Special Protection Area, which has been designated mostly for the protection of significant numbers of waders and waterfowl, which spend the winter in the Solent. The area is now settled and is an extensive grassland forming a valuable wildlife habitat. The Common is a gassing landfill site subject to methane control measures as it is a former tip. There is an informal network of footpaths with the eastern footpath running alongside Langstone Harbour, which was recently re-landscaped as part of improvements to

Portsmouth's flood defences. The common includes three freshwater lakes ('Frog', 'Duck' and 'Swan', home to many aquatic and avian species, including the internationally significant birdlife which uses the adjacent harbour). Milton Common is also home to Langstone Church, which encompasses *Little Bears Forest Pre-School*. The Common is owned and maintained by Portsmouth City Council and Portsmouth City Council recommended its designation as a Local Nature Reserve in July 2015 in order to enable it to function under a mitigation framework for future recreational use connected to approval of proposed development in the Milton area which commenced in 2015 on the sites of the former Gleave and Light Villas in St James Hospital.

**Edenbridge Park:** Previously part of the St James' Hospital campus, the park was created as part of the new Edenbridge estate in the late 1990s. The park includes a children's play area and is a walking route from Milebush Road through to Mayflower Drive. The park is owned and maintained by Portsmouth City Council.

**Furze Lane Sports-Fields:** Formerly part of Milton Common "Pasture" on the eastern coastal fringe. In the 1960's the land became sports-fields associated with the Teacher Training College constructed on the east side of Furze Lane. With the transfer to the Polytechnic and subsequently the University, they have become increasingly intensively used for University team-sports with community clubs taking up spare capacity. The central grassed pitches were converted to Floodlit "3G" artificial turf with a planning condition requiring the compensating grassland Brent geese habitat loss to be protected at Langstone Campus. The pitches are owned and maintained by Portsmouth University.

**Langstone Campus Fields:** Related to the Sports fields, the former grassed football pitch on the east of the Langstone building complex can no longer be used for organised sports to comply with the 2010 synthetic pitch planning consent protecting the Chichester & Langstone Harbour SPA, RAMSAR and SSSI restrictions. The land is owned and maintained by Portsmouth University.

**Eastney and Milton Allotments:** Comprising 3 individual "parcels" on land formerly Milton Common Pasture known as Hope Cottage; Eastney Lake and Milton Piece bounded on the south and east by Langstone Harbour mudflats (now known as Lock Lake), an important habitat for wading birds. They are very popular and Portsmouth-wide there are around 500 applications pending. There are approximately 500 plots between the 3. Within Milton Piece allotment is a community allotment where groups can share in vegetable growing and is promoted by Portsmouth Health.

## Coastline

The Milton Neighbourhood Plan Area includes 1.5 miles of Langstone Harbour's sheltered coastline with Portsea Island. Langstone Harbour has an area of about 7.5 sq miles linked by tidal channels with Chichester Harbour and Portsmouth Harbour. It receives two tidal surges daily; the flood takes about 7 hours and the ebb 5.5. The tidal range is between 0.4 and 5.0m AOD on the springs and 2.0 and 3.8m on the neaps.

The Harbour is a shallow estuarine basin and, as far as the Neighbourhood Plan area is concerned, it is characterised predominantly by the invertebrate rich mud flats helping feed the Harbour's 40,000 visiting and native seabirds. Parts of the Harbour are a Sea Bass Nursery. Because of its significance as a seabird habitat the Harbour is designated as a Special Protection Area, a Special Area of Conservation, a Ramsar Convention on Wetlands of International Importance especially as Waterfowl Habitat (RAMSAR) and a Site of Special

Scientific Interest. The grassland areas around the Harbour including the Langstone Campus sports fields and spaces together with Milton Common are important feeding grounds for dark-bellied Brent Geese overwintering from Siberia and representing 6% of the World's population.

The Harbour, including the foreshore in the Milton Neighbourhood Plan area is managed by the Langstone Harbour Board from their offices at the Hayling Island Landing Stage. They are a Statutory Consultee in the preparation of this Plan. They have a conservancy function and all vessels, visiting and resident, pay harbour dues and mooring license fees respectively. The largest vessels of circa 2,000 tonnes use the two commercial wharfs for marine aggregates at Bedhampton and Kendal's Quay. The latter is just north of the Plan area. Apart from a small fleet of inshore shellfish trawlers, and a deep-sea fishing boat charter business, the Harbour moorings are predominantly provided for recreational sailing (see photo 4: Boats, Geese and Mud).



*Photo 4: The Harbour at low tide; Boats and Geese and Mud*

An hourly Ferry service links Portsea Island with Hayling Island and provides the start and finish of the 14 miles “Langstone Harbour Waterside Walk” promoted jointly by The Harbour Board and by Portsmouth City, Havant Borough & Hampshire County Council's it is also featured in the Long-Distance Walkers Association's list of walks. It is currently being consulted upon by Natural England to form part of England's Coast Path under the Marine and Coastal Access Act 2009. The route is a useful aid to the description of the Neighbourhood Plan coastline.

Beginning at Eastney Lake, the most south-westerly inlet of Langstone Harbour (see photo 4 Eastney Lake), the walk takes you around the edge of the Milton and Eastney Allotment site towards Milton Locks Nature Reserve. This section is inaccessible on Spring Tides and often muddy in winter. In that event, walkers are directed towards Bransbury Park where the walk re-joins the coast at Milton Locks.

Eastney Lake is an area for small craft moorings. Cormorants are often seen drying out their wings on the navigation posts. It will be one of the last “cells” in the Portsea Island Coastal Strategy to be protected with sea-defence improvements. The Strategy adopts a “Hold-the-Line” approach to the whole of Portsea Island.



*Photo5: Eastney Lake*

The Nature Reserve (see also photo 5: Eastney Lake) provides the last piece of natural shoreline on the Portsea Island side of Langstone Harbour with a “soft” edge between high tide and dry land showing the transition from harbour to land with no seawall. Insect-rich specialised grasses such as “Seacouch” and “Hard” grass are found just above the waterline and is home to many bird and butterfly species such as small copper, green-veined white and painted lady butterflies. Plants include common mallow, wild carrot, common vetch and autumn hawkbit. Bird species feeding on the mud banks include black headed and herring gulls, dunlin, oystercatcher, turnstone, ringed plover and redshank. The Reserve is managed by the PCC and supported by the Hampshire and Isle of Wight Wildlife Trust who help organise frequent educational events for children.

From the Reserve, the “Waterside Walk” heads towards the former Portsmouth-Arundel Canal at Milton Locks past the “Thatched House” Pub (part of which is C19th) where Eastney Lake merges into Lock Lake. The remnants of the Locks are Listed Grade II. It features a cast iron footbridge to access the public footpath and shore at the Locks Sailing Club (see photo 6: Milton Locks).



*Photo 6: Milton Locks*

It is within Conservation Area 21 which includes the Langstone Harbour Fisherman's Association Clubhouse, the footpath and the Hard used by the Locks Club for low water access (see photo 6: Hard looking towards Hayling Island) and <https://www.portsmouth.gov.uk/ext/documents-external/dev-cons-area-21-guidlines-miltonlocks.pdf>

The coastline here has a seawall from the Sailing Club towards Milton Common past the 8 houses in Longshore Way and the playing fields at Langstone Campus (see photo 7: Seawall towards Milton Common). Historically, Beach Lodge formed part of St James's Hospital Estate

and was accessed directly from Furze Lane and lies at the southern end of the Hospital's former cornfields. The remains of the two Hards or walkways from the Lodge to the Marina Channel have now been obliterated with mud and weed deposited from incoming tides.

The Marina Channel links Southsea Marina with Eastney Point where the Harbour main entrance channel from the Solent ends (see earlier photo 6: Hard looking towards Hayling Island). This section of seawall is not in the current priority of “cells” for sea-defence improvements.



*Photo 7 Seawall towards Milton Common*

*After Langstone Campus, the coastal footpath merges with the edges of Milton Common where the width of the Harbour across to Hayling Island can be appreciated.*



*Photo 8: Hard towards Hayling Island*

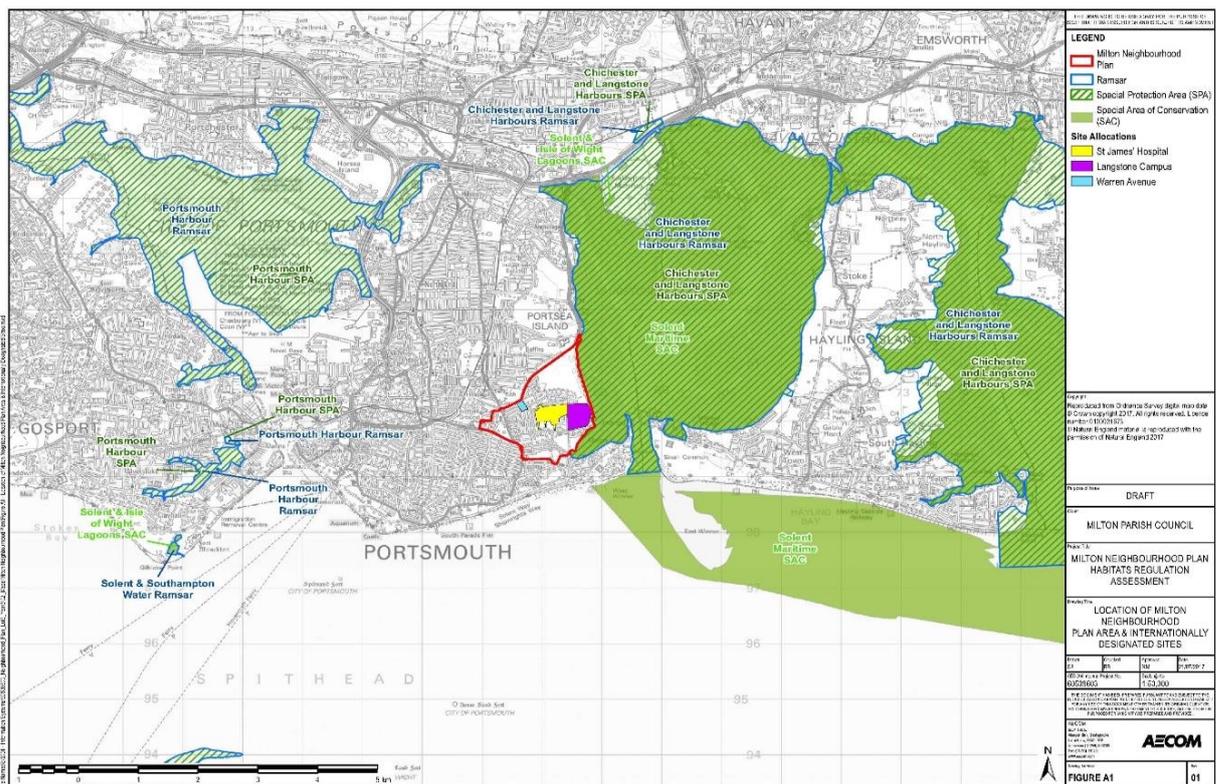
Milton Common is a local nature reserve artificially created from infilling “Milton Lake” in the 1960s and the former Harbour Wall is just visible at the southern end of “Swan Lake” where it connects with the recently widened footpath from Moorings Way to the Coastal path. The flood defences in this area have been improved under the Great Salterns Quay-Milton Common priority scheme. For the Coastal path this means “hardening” with a granite rock revetment. The Milton Common Peoples Memorial has been saved (see photo 9: the Peoples Memorial).



Photo 9: the Peoples Memorial

The Peoples Memorial was initiated in 2009 as a tribute to the Armed Forces servicemen and women using recovered materials from Milton's shoreline.

## Coastal Area Special Designations



Map 10: Special Designations

Langstone Harbour is a Site of Special Scientific Interest (SSSI), a RAMSAR and a Special Protection Area (SPA) within a Special Area of Conservation (SAC).

The SSSI is a National designation initiated for the Harbour as early as 1958 in recognition of its international importance as a rich intertidal system supporting high densities of intertidal invertebrates and large populations of migrant and overwintering waders and wildfowl,

dependent upon them and upon the extensive beds of eelgrass species. The Harbour is among the twenty most important intertidal areas in Britain as a summer and autumn assembly ground for waders during the moult (when they require abundant high protein food) and as a post-moult wintering ground. It restricts various operations without the consent of Natural England including bait digging, land reclamation, sea-defence construction and recreational uses likely to damage the vegetation or fauna.

The RAMSAR designation is based on an International Treaty signed in the Iranian City of Ramsar in 1971, by a group representing 18 Government's and is a Convention on Wetlands of International Importance. The Ramsar Convention as it's now commonly called is the only international treaty that sets out to conserve just one type of ecosystem, our wetlands. The RAMSAR includes Chichester Harbour. The Langstone Harbour wetlands are a habitat for around 20% of visiting Little Egrets to Britain, 6% of the visiting population of Dunlins and, in the 1970s and 1980s, Langstone Harbour alone consistently supported in excess of 5,000 wintering dark-bellied geese *Branta Bernicia*, or 5-10% of the world population depending on fluctuating population levels. At certain times, as many as 20% of the black-tailed godwit, 8% of the ringed plover and 8-10% of the grey plover wintering in Britain have also been present in the harbour.

The SPA is a European designation following Article 4 of the EC Birds Directive which came into force in April 1979. This SPA covers both Langstone and Chichester Harbours. The purpose of the SPA is to protect the habitat of wading birds including the above together with the Little Tern and Sandwich Terns that migrate here in the summer months from the West Coast of Africa. 49 Sandwich Terns are claimed to have fledged this year.

The Harbour became a SAC in April 2005 and forms part of the wider Solent Maritime Conservation objectives. SACs are strictly protected sites designated under the EC Habitats Directive. Article 3 of the Habitats Directive requires the establishment of a European network of important high-quality conservation sites that will make a significant contribution to conserving the 189 habitat types and 788 species identified in Annexes I and II of the Directive (as amended). European sites are also afforded protection under the Conservation of Habitats and Species Regulations 2010 (Habitats Regulations).

The University Playing Fields abutting Langstone Harbour and to the west of Furze Lane are key Brent Geese high tide feeding and roosting sites. These are identified in the "Solent Waders and Brent Goose Strategy" (SW & BG Strategy) as sites P23B and P25 respectively. The Strategy is a non-statutory document aiming to protect the network of non-designated terrestrial Wader and Brent Goose sites supporting the SPA and SAC from loss and recreational pressure. It presents evidence, analysis and recommendations to inform decisions relating to strategic planning and individual development proposals: see <https://solentwbgs.files.wordpress.com/2017/02/solent-waders-and-brent-goose-strategy.pdf>

The latest SW&BG Guidance 2018:-<https://solentwbgs.files.wordpress.com/2018/03/swbgs-interim-mitigation-guidance-2018.pdf> classifies the importance of the various sites around the Solent in order to ensure their geographical spread is maintained and enhanced. The fields adjoining Langstone Student Village are classified as a "Core Area" and the Playing Fields on the west of Furze Lane as "Secondary Support" in meeting the conservation objectives of the SPA and SAC.

Milton Common is a Local Nature Reserve; (<https://www.portsmouth.gov.uk/ext/documents-external/dev-site-allocations-localwildlifesites-cd-jan14.pdf>) It is described in the City Council's 2015 Milton Common Restoration Management Framework "as one of the most valued open spaces in Portsmouth and is one of very few semi-natural areas on Portsea Island where it is truly possible to escape the built-up nature of city life". It was reclaimed from the sea in the 1960s, and has changed significantly over the past 60 years through the settlement of dumped building materials and their degradation and the proliferation of brambles and scrub. It now contains a vast array of wildlife, making it intrinsically valuable in its own right as well as being highly regarded by local residents.

The Restoration Framework is aimed at improving Milton Common to become the first choice for people who want a semi-natural space to escape city life, enjoy quiet recreation and appreciate the intrinsic value of the natural environment, see <http://democracy.portsmouth.gov.uk/documents/s8065/Appendix%20A%20-%20Milton%20Common%20LNR%20Restoration%20and%20Management%20Framework.pdf>

Milton's "Pocket" Nature Reserve (also referred to in the Council's "Local Wildlife Allocations") is sited at the upper end of Eastney Lake near the entrance to the "Thatched House" pub. It is a small block of upper salt-marsh and associated rank grassland and coastal scrub. The site also contains the county scarce Sea Radish (*Raphanus Raphanistrum* subsp. *martimus*) together with the House Sparrow (*Passer domesticus*) and the Starling (*Sturnus vulgaris*). Both of these bird species are listed for conservation "concern".

As with the Common it would benefit from some further active management but it is a highly valued and tranquil refuge.

## Coastal Conservation and Conflicts

The most significant wildlife and environmental conservation objectives are provided for by Statute as discussed in the Section on Coastal Designations.

The character of the Milton coastal scene is influenced by the seasonal migrations of several different wading birds, wildfowl and Terns. Most obvious however is the influx of several thousand dark-bellied Brent Geese in October from Siberia.

The two fields on the University's Langstone Campus site are important high-tide feeding and roosting sites. The Campus field adjacent to the Harbour is restricted by a planning condition imposed on the consent to the creation of artificial grass on part of their sports field grazing land east of Furze Lane: [http://publicaccess.portsmouth.gov.uk/online-applications/files/3BED25E8888B07BCBBAAE27F20226D7/pdf/10\\_00518\\_FUL-DECISION\\_NOTICE-377408.pdf](http://publicaccess.portsmouth.gov.uk/online-applications/files/3BED25E8888B07BCBBAAE27F20226D7/pdf/10_00518_FUL-DECISION_NOTICE-377408.pdf)



Photo 10: Langstone Campus fields

Brent Geese feed in daylight and the use of terrestrial feeding sites is greatest at high tide. Harsh winters also cause an increased use of terrestrial sites as eelgrass dies back.

The SW & BG Strategy's classification of the Langstone Student Village playing field as a "Core Area" is apparent in this winter 2017/18 photo below before its closure in July 2018.

The suitability of sites for Brent Geese depends on distance from the coast, the size of the grazing area, the type of grassland management, visibility and disturbance. Brent Geese prefer large open sites with clear sight-lines and short, lush grass for grazing. Much energy is expended travelling between feeding areas, so sites adjacent to the coast are ideal.

Disturbance affects Brent Geese such that when mildly alarmed, they raise their heads but quickly resume feeding. With increased levels of disturbance, they fly away and resettle when the disturbance has abated, or look for another quieter site nearby. The effects of disturbance create a double "jeopardy" by reducing feeding opportunities whilst simultaneously depleting stored energy when taking to the air.

Natural England has advised the Solent Local Authorities there is a Likely Significant Effect associated with the new housing planned around the Solent. Natural England's advice is therefore to ensure avoidance measures are implemented in order to ensure a significant effect, in combination, arising from new housing development around the Solent is avoided.

The respective Local Authorities have in response drafted a Solent Disturbance and Mitigation Strategy and is explained in <http://www.birdaware.org/strategy> and endorsed by PUSH in December 2017.

The evidence of new housing development reducing the quality of the habitat in the Solent SPAs is widely accepted and Portsmouth City Council produced, in April 2014, a Supplementary Planning Document (SPD) entitled the Solent Special Protection Areas; see <https://www.portsmouth.gov.uk/ext/documents-external/pln-solentspas-spd-adoptionspd.pdf>.

For Langstone Harbour and the adjoining Brent Geese feeding areas the biggest issue is the popularity and proliferation of professional dog walking which has become an unregulated small business opportunity. Although a nuisance to small children and adults alike, the fear and stress to Brent Geese and nesting Swans on the Milton Common Lakes caused by poorly controlled dogs cannot properly be mitigated by an occasional Ranger presence.

A C3 residential use on the Langstone Campus Student Village Site, immediately adjacent the SPA, would be particularly inappropriate, and would conflict with all the social and environmental objectives the NPPF sets in Chapter 15, paras 170-183 relating to the conservation of the natural environment.

The Milton Common Restoration Framework referred to in the Coastal Designations section earlier aims to divert recreational pressure away from the shoreline and improve its quality. The Solent Disturbance Mitigation Project estimates 52 million annual visits to the Solent's coastline will be increased by the sub-region's aspiration to provide another 121,500 new homes by 2034 (PUSH Position Statement 2016). Even if this could be achieved and be sustainable, the improvements to Milton Common are not provided to address these (see para 5.5 of the Milton Common Restoration Framework). Currently dog-walkers on the Common from Milton and elsewhere in the City prefer to walk along the shoreline, especially as the sea-defence works have improved the footpath.

This Framework specifically does not address any effect which a Campus residential redevelopment or Hospital re-development could cause on the Langstone Harbour SSSI or the Solent Maritime SPA (see para 5.6 of the Restoration Framework).

The Restoration Framework will not even mitigate the harm to the Langstone Campus sports fields by the increased residential development at St James' Hospital. Para 5.7 of the Framework is explicit in stating "the wildfowl and waders using the two SPAs also use a variety of terrestrial sites to feed and roost on at high tide. There are several of these in the Milton area which collectively form a network of sites which are used by SPA species at high tide". However, most notable are the two playing fields at the University of Portsmouth's Langstone campus. These are part of the potential development site and the western field directly abuts the St James's Hospital sites. This Management Framework does not address any impact which development could have on these high tide feeding and roosting sites".

Finally, the Restoration Framework will not address any impact which the development could have on biodiversity generally, such as destruction of on-site habitat, or any impact which the development might have on a European Protected Species (para 5.8)

The objectives of the Solent Maritime SPA mitigation is further compromised by the improved shoreline footpath, any new residential use so close to the Harbour shoreline will only exacerbate the wildlife habitat stress.

The Milton Neighbourhood Plan considers Langstone Campus is better suited to education, not just because of the deficit in school-places, **but** the grassland can be managed and maintained to a suitable standard for Brent Geese feeding **and** be a use consistent with the requirements of the SPA Supplementary Planning Document.

In any event, subsequent to the PCC's SPD, the other 15 Local Authorities and Wildlife Bodies have co-opted to prepare the Interim Solent Recreation Mitigation Strategy dated December 2014. The estimated 52 million annual visits to the Solent's coastline will be increased by the sub-region's aspiration to provide another 121,500 new homes by 2034 (PUSH Position Statement 2016). Even if this could be achieved and be "sustainable", the improvements to Milton Common are not provided to address these (see para 5.5 of the Milton Common Restoration Framework).

This Framework does not address any effect which a Campus residential redevelopment or Hospital re-development could cause on the Langstone Harbour SSSI or the Solent Maritime SPA (see para 5.6).

In summary, the inherent conflicts of large-scale housing development in Milton on the local wildlife habitats will increase the recreational stresses and the Neighbourhood Plan is therefore proposing an alternative option for Langstone Campus.