

Subject: Submission of Milton Neighbourhood Plan to Portsmouth City Council

Dear Fiona

I hope you are well.

When we met at St James' Hospital a couple of Summers ago to expose the failures with the Locksway Road Care Home application by LNT on behalf of the RN Benevolent Trust, I agreed to write to you once we had submitted our "Final" Draft Neighbourhood Plan to the City Council. It is the first, and only one in the City so far.

Please see the attached.

It was submitted on 27th July and forgive me if I didn't contact you immediately, but I had a house sale to complete in rural West Gloucestershire on Friday.

It is the final stage before it proceeds to a Public Examination by an Independent Planning Expert, appointed by the City Council, with our consent.

Should we be successful in that process, we would still be required to face a Local Referendum and obtain over a 50% approval in the votes cast, for it to become part of the City's Local Development Scheme.

This Plan was six years in the making. It should have been only two according to initial guidance. However, Covid happened; the City Council changed politically; their staff came and went; and none of their original liaison officers we worked with at the start, survived.

The Policies attached are "evidence-based", mostly from PCC's own research and reports. They steer a course towards sustainable development between now and 2037, negotiating the inconsistent objectives of Central Government's rhetoric to leave the natural environment to the next generation better than it is now, with their excessive housing targets, all in the context of manoeuvring local "short-term" politically "expedient" annual Election cycles.

Our Plan must be subordinate to, and in compliance with, the strategic policies of the City Council's Plan and clearly if the Council had proposed different Policies, then we would not be supported at Examination. .

As you will see, the aim we've set ourselves is to allow for development that meets the needs of local people and improve their quality of life. Since the mid-late 1990's much of the Hospital estate was redeveloped for housing at the expense of improving local facilities. Parents of Primary school-children living in the 349 new homes already built on St James' often face crossing the Eastern Road to access Langstone School or otherwise, driving round adding yet more to traffic congestion and air pollution. Milton Park school abuts a heavily congested road and is highly and often, over-subscribed, and the Meon Infants and Juniors School site is so cramped, play-times are staggered to mitigate injury.

In addition to the liaison with the City Council, our project involved community and landowner engagement. However, because it took so long, the NHS managed to avoid master-planning their withdrawal from the Hospital and instead persisted with their fragmented disposals policy. We therefore still have one non-compliant, environmentally unsustainable application to oppose. That comes from PJ Livesey, a Manchester based Developer, to convert the hospital and build their lego-

style, "flat-roofed blocky house" designs which are not just disharmonious to the Hospital's setting and landscape; they destroy 53 Tree Preservation Order trees too and build on protected green space in the current Portsmouth Plan.

Penny Mordaunt has been influential with Homes England in making them re-think the other development proposal which is on the Hospital grounds, east and south, of the Grade II Listed Chapel. After we resolved our three year conflict with the City Council in March when, our evidence the Arthur Cogswell built Edwardian Villas, were indeed so significantly historic and integral to the Hospital's function proved unequivocal, they couldn't be demolished without proper justification and Listed Building Consent, Homes England are reviewing their proposals.

The absence of local health-care sufficiency for residents is becoming increasingly obvious and you can imagine our delight in 2016 when the local Clinical Commissioning Group opted against opposing our suggestion that no new housing on St James' should be built unless and until health-care provision was restored/provided. It is both sad and ironic that the dysfunction between NHS Property Services and Clinical Care is still prevalent and a doctor's surgery and pharmacy is still not in the NHS's plans for St James'.

We are encouraged by the City Council's latest iteration of the Portsmouth Plan approved for Consultation on 27th July in so far as it improves upon the earlier Consultation proposals for Milton in 2017 (albeit qualified with a rejection the excessive housing numbers nobody wants, and the environment can't sustain are included). That is because it offers the potential for a mix of uses for the Hospital, including medical and community uses, elderly residential and affordable housing, in addition to market housing. This Policy broadly aligns with what we've planned for because it reduces car-dependency and simultaneously affords/retains employment opportunities. We always wanted the Hospital to be "master-planned" holistically so that future redevelopments could all function cohesively.

Our proposals for Langstone Campus have been more problematic because, notwithstanding the local traffic congestion; all of the environmental constraints associated with the conservation of wildlife habitat required under the International Conservation objectives for Langstone Harbour; the Campus site is partially "brownfield". The University still wanted a residential scheme and they have a planning right to use the existing buildings even if there are environmental restrictions. The type of development that could meet community needs within the environmental restrictions would be an educational facility but it seemed as if the University couldn't see it might be in their long-term interest to have one in order to sustain University admissions into the future. We see it as an ideal site for a through school for 5 to 16 year old children, because it utilises the greener environment with its great opportunities for outdoor games and sports, and it is situated in an accessible site local children could walk or cycle to. It's also in an area of Portsmouth poorly served in terms of school-places.

We have proposed that cycling and pedestrian access be made a priority in future development schemes where high levels of renewable energy provision will also be required to mitigate carbon emissions. Furze Lane is proposed to be retained as a cycle and bus only route with improvements for cycle access across Milton Common to the Eastern Road to link into the Sustrans Strategic Network.

We are also very pleased therefore, the Council's Plan for Langstone Campus broadly aligns with ours in terms of permitting development for a range of uses including education, recreation and community uses with residential, where they retain the overwintering Brent Geese feeding areas and can satisfy Natural England and the Council, the habitat damage to the adjoining Harbour can be

"appropriately" mitigated. The Milton highway network has been stretched in recent years beyond capacity, and without any real opportunity to improve junctions meaningfully, a housing scheme for up to 120 new family homes would be inappropriate. .

Our long long-term objective (and we realise we can't "make" it happen because we cannot control the land), is to allow for an extension of Milton Common into the Campus should the University, or their successors, find no alternative use for the redundant buildings. It involves swapping the development rights attached to the Campus, with some of the open-space use on the Furze-Lane Sports-Fields. It would recreate the open frontage to Langstone Harbour which pre-existed the use of the Campus for a State funded Teacher Training College which in turn, preceded the International Conservation Designations with all its objectives to protect the wildlife habitats in Langstone Harbour.

The pandemic taught us how crucial open space is to physical and mental well-being and, if this one outcome of a Milton Common extension is ever achieved, then ultimately, our Plan will have improved the physical amenity for the benefit of the Local Community, and indeed Portsmouth generally. That's because this most densely populated UK City, is so grossly under-provided for in terms of green and open space amenity (which in itself is a contributory factor to our high levels of deprivation and lower than average life-expectancy), we would have re-balanced development for the enduring benefit of future generations.

For us, the institutional disconnect between long-term sustainable communities in the wider public interest becoming subservient to private gain for the few, was the ignition for our determination to plan for something better. Indeed, as we've tried to explain to the Minister for Housing and Communities through Penny Mordaunt, too much of the direction of town planning is diverted away from communities rather towards them, for their own benefit.

The NHS was created for us and by us for the common good but, using the PJ Livesey proposal as an example; their whole scheme is predicated on overbidding for the Hospital site to enable the NHS to meet Central Government disposal targets. Under MHCLG's distorted planning guidance, a positive value is ascribed to property and buildings with liabilities. PJ Livesey's loss becomes underwritten by means of an automatic right to receive a substantial return. It's a financial return for a liability they were aware of when offering to purchase a Grade II Listed Building in disrepair, and subject to limitations on highway capacity. By using this artificially contrived exemption of financial "viability" they, and the landowner, become rewarded for compromising the setting of a Listed Building and the landscape it sits in. Effectively it's a state sponsored scam undermining environmental and social objectives to the detriment of the community compounded by the fact the land was built for and by, local people, out of local funds.

Our two MPs, Penny Mordaunt and Stephen Morgan, have both helped us along the journey and are united in challenging the City's imposition by the Housing and Communities Department with its excessive housing targets. That is especially important to meeting our objectives too because, notwithstanding the absence of space and land-supply to accommodate the 17,700.new homes in Portsmouth, there is no sufficiency in infrastructure here to sustain it, and nor is there the means of providing it. Consider too, Southern Water has failed for the last ten years to curb raw sewage releases into Langstone Harbour on current levels of development and, 55% of the Harbour's macro-algae contamination, is from nitrate depositions also arising from existing urban and agriculture development, then where is the social and environmental benefit from any new development let alone of this magnitude?

This development induced contamination is 62% higher in Langstone Harbour than in Chichester Harbour which ought to be sufficient justification to review the relationship between development and the environment. As it is, the Solent Authorities have been required to devise a mitigation strategy to reduce stress to the Langstone and Chichester Harbour wildlife habitats from recreational disturbance to accommodate recently planned increases in housing developments. To put this into context, we are three years into a Central Government 25 Year Plan to restore Nature and the Environment so how can reducing increases in environmental damage ever be compatible with restoration? Poor water quality harms the whole eco-systems our precious marine life, our bird populations; and ultimately we, depend upon. Compound this with our excessive air pollution levels where is the coherent Government strategy in all this?

Stephen Morgan, in whose constituency St James' and Langstone Campus is situated, has been particularly energetic in fighting MHCLG's housing targets, because he is all too aware of why these housing numbers can't be accommodated in the City, and why they pose a particular threat to the retention of green spaces in Milton.

Please call me on 07857 616756 if you want to discuss anything further and we hope you will find the story sufficiently interesting to publish. Alternatively, you may call Paul Docking, our Secretary on 07538 371976 if I am not available.

Kind regards

Rod Bailey
Chair Milton Neighbourhood Planning Forum .