

25th October 2021

FAO: planningpolicy@portsmouthcc.gov.uk

Portsmouth Local Plan 2038 Reg 18 Consultation October 2021

Dear Sirs,

CPRE Hampshire has always taken a keen interest in planning in Portsmouth, particularly through its membership of PfSH. We have specific interests with respect to its strategic planning policies, ambitions for urban regeneration and the process of calculating housing numbers.

Most importantly, we wanted to respond to Question 4 (Policy H1), as this has much wider regional impacts than just Portsmouth's own needs. We also have comments on Question 22f and 29b.

Question 4 (Policy H1).

YES, CPRE Hampshire believes there are exceptional circumstances which justify an alternative approach in line with current and future demographic trends.

1. We recognise PCC along with other PfSH authorities are now forced by the current NPPF Standard Method to use housing numbers based on 2014-based household projections. CPRE Hampshire fundamentally rejects the use out-of-date projections, and has urged the Government at all levels to use the latest projections, at least from 2018 onwards. We believe that the results of the 2021 census, plus the impacts of Brexit and Covid will only confirm that the ONS work has more validity than that previously done by MHCLG, and that much of South Hampshire will see reduced population and household projections. At the bottom of this letter is a graph showing comparison of the Standard method using 2014 and 2018 projections.
Specifically for Portsmouth the difference in household projections is significant, with a much lower target from using the 2018 projections, only around 379 dpa.
Could PCC request early release of the Census 2021 population and household projections as this difference is material?
2. There have been challenges to the figures for ONS population projections in around 50 university cities and towns, with a request to the ONS by the Office of Statistics Regulation to investigate. This could have fundamental impacts on Portsmouth (and Southampton). Portsmouth the 23rd most affected city, and Southampton is the 9th.
Ed Humpherson, Director General for Regulation of the Office for Statistics Regulation, asked the ONS in May 2021 to revisit their projections as they agreed that there had been an error whereby the ONS had possibly overestimated the number of students staying in these 50 cities after their degrees were completed. We do not know if PCC employs a specialist demographer, but it seems to us that this is worth pursuing with some effort.
The discrepancy came to light in Coventry and Guildford when population projections were compared with the following aspects, none of which supported the presumed increase in population/household projections:
 - Job growth
 - Gas and electric use

- Voter numbers
- School admissions
- Pension & benefit claims
- Car registrations
- A&E attendance
- Household waste

Could PCC request answers from ONS as to the potential impact of this review on Portsmouth's population and household projections?

We have sent similar information to Southampton CC and PFSH, so it may be worth discussing a combined request to the ONS.

Question 22f (Policy G2).

3. Nothing less than a drastic change to spatial strategy and a move away from South Hampshire's historic pattern of sprawling suburbs will enable any meaningful contribution to the fight against adverse climate change. We owe it to future generations to do our utmost to shift patterns of behaviour that have become entrenched with the use of the private car. Even electric cars will not solve many of these issues as they still leave residues from tyres and fluids and are unsustainable in terms of battery manufacture. The adoption of a South Hampshire Green Belt would assist this by encouraging urban redevelopment and preventing sprawl into the countryside where modal change to walking, cycling and public transport is very much more difficult to achieve. It would also maintain the settlement pattern before it is further degraded. We are encouraged to see that all the PFSH authorities are continuing to consider a new Green Belt and look forward to the report in due course.
Please can PCC continue the work with PFSH to include a Green Belt in their spatial planning work and include this principle in Policy G2 Green Infrastructure.

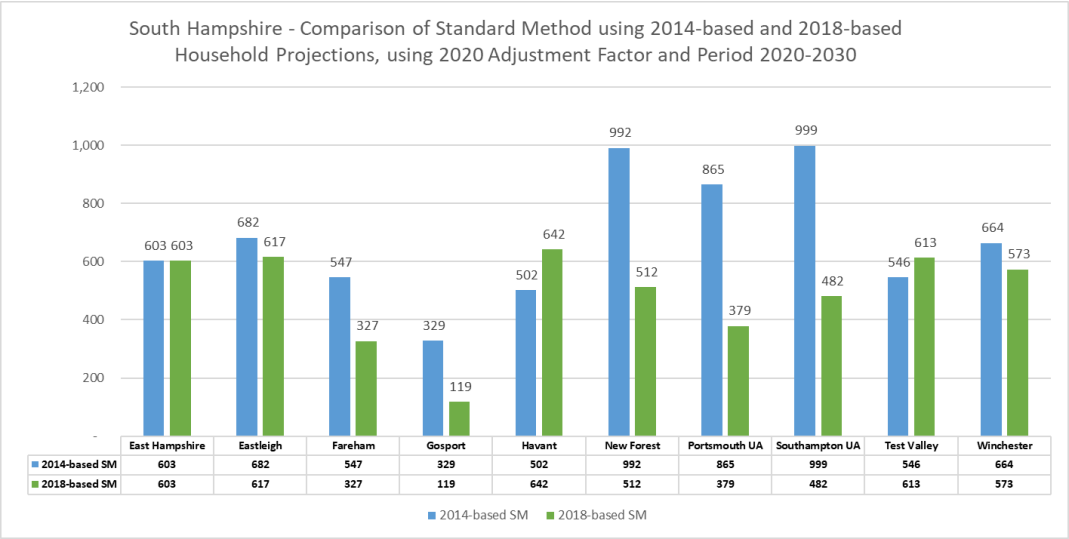
Question 29b (Policy D4).

4. CPRE Hampshire believes that one of the most fundamental ways of combating the likelihood of adverse climate change, is to plan development where it can use better public transport and be less reliant on the car. It is important that development does not just respond to climate change, but more importantly how spatial planning can help prevent it. According to Camilla Ween, Harvard Loeb Fellow, speaking on behalf of Transport for New Homes "Transport is responsible for about 26% of greenhouse gas emissions, much arising from personal car journeys. Our society will not be able to achieve the UN goals if we do not change the way we travel; that means we need to create new communities that are NOT car dependent. That means careful consideration of where new development is located, as well as how we design new communities, for example, places that are well connected with high quality public realm and movement infrastructure that encourage people to want to move to a car-free lifestyle." We would hope it to be a fundamental tenet of the all the South Hampshire authorities, including PCC, that NO development should be permitted that relies on the car as its main means of access.
5. All policies, plans and decisions need to be measured against the objectives of the Climate Change Act 2008. The RTPI have studied this in their January 2021 report 'NET ZERO TRANSPORT - The role of spatial planning and place-based solutions'. They say: "The planning system should also prioritise urban renewal that enables growth while achieving a substantial reduction in travel demand". It might also help to see the outcome of a study carried out by Cool Climate at the University of Berkeley to demonstrate the most substantive action local authorities can take to minimise greenhouse gases. Although it used US cities for the study, the principles would apply just as much to Portsmouth, and showed the single most effective measure is to increase urban infill in preference to car-based development. The graph is shown at the bottom of this letter.
6. This means that Portsmouth's urban regeneration plans are important for preventing Climate Change, as well as being better for its own people and communities in a wide variety of social and economic aspects.
Please can PCC ensure that Climate Change is at the heart of its spatial planning policies.

As always, we remain keen to work with PCC, and look forward to ongoing liaison through the Local Plan process.

Kind regards,

Caroline Dibden
Vice-President CPRE Hampshire



Note: graph does not include the 35% uplift for Southampton, and covers whole districts for East Hampshire, Winchester, Test Valley, New Forest.

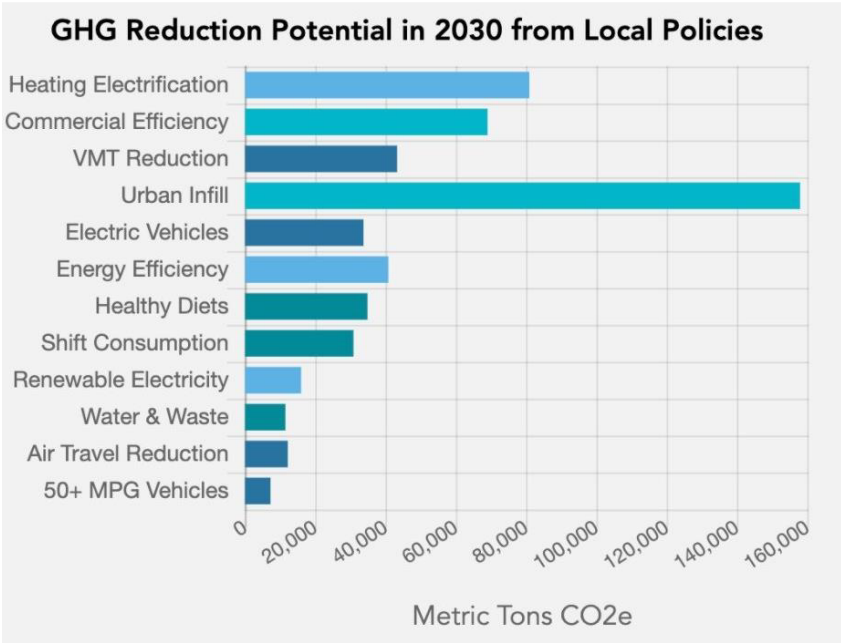


Figure 10: Cool Climate Network, 2018