

SOUTHAMPTON CITY VISION

Local Plan

Draft Plan with Options

Consultation Results
Part 2: Detailed Results



SOUTHAMPTON
CITY VISION

Local Plan



**STRATEGIC
APPROACH**

Theme	Strategic Approach
Policy Name	Development Targets
Policy Number	ST1(S)
Options Y/N	N

SUMMARY OF RESPONSES (80 received)

In total 37 comments were made on the Strategic Approach policy and a further 43 on the overall approach of this policy. Around half of all comments were mixed responses, with a quarter each in general agreement and general disagreement. Relatively few specific suggestions were made on amendments to the policy text.

Looking initially at broader themes, the largest number of comments were made about housing. First the overall target, including the Government’s standard methodology and its use of out-of-date population and household projections. Several comments related to the 35% uplift and the fact that since the consultation started there has been some suggested relaxation of the 'target'. Further clarity will be required before finalising housing numbers. In addition to this several comments were made in relation to the unmet need and the role of the Partnership for South Hampshire (PfSH), some suggesting Southampton needs to do more to meet the housing target, with some recognising the constraints of the city and questioning where new homes will fit. Others said the Council must engage more with neighbours on this matter and several comments were made on affordability, mix, location, density, height and deliverability of new homes.

Linked to housing were a number of comments on community and neighbourhoods, with several supporting the principle of '20-minute neighbourhoods'. There were also suggestions that health and community benefits should be part of assessing new development along with engaging local people about their local areas.

Employment space was another topic area with a number of responses, most notable was questioning the need for more office and retail space given changes in working and shopping habits. There was recognition that Southampton was a regionally important retail destination, but an update to the retail study is needed. In relation to this some felt more should be done to support local businesses. There were also a few comments on need to support sectors such as tourism, the green economy, the port and maritime industries.

Transport was a common theme, mainly in relation to public transport, active transport and reducing car use. The concept of ensuring sustainable locations for new development was widely supported.

Several comments were made on environment and climate change. These included the need for development impacts to be mitigated, and for green space to not only be protected but enhanced. There was support for delivering biodiversity net gain and seeking nature-based solutions.

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Summary of Responses
January 2024

Other comments included some around specific sites, masterplanning and linking with other plans and strategies.

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HOMES

Theme	Homes
Policy Name	Density
Policy Number	HO1(S)
Options Y/N	Y

DENSITY POLICY OPTIONS	AGREE	DISAGREE
Option 1a – To include a density band for transport corridors and hubs with a buffer of 400m and minimum density standard of 100dph (see map 1 above). This will align with National Planning Policy Framework paragraph 125(a) which supports optimising the use of land, including the use of minimum density standards in accessible locations as a means to support sustainable growth.	25	11
Option 1b – To not include a density band for transport corridors and hubs (see map 1 above). This would enable development of lower densities to be accepted and could result in a larger housing shortfall in Southampton	16	18
Option 2a – To support the density levels proposed – in Policy HO1. This will help achieve housing targets but will require building to greater densities that have been proposed in previous Local Plans which will mean changes to the types of housing being developed including an increase in the number of developments for taller buildings	22	13
Option 2b – To support a higher density target than that proposed in Policy HO1. This will further help in achieving housing targets but will require additional taller and landmark buildings to be built which may have a negative effect on the appearance and character of the city	14	21
Option 2c – To support a lower density target than that proposed in Policy HO1. This may be more reflective of the current status quo approach to density but will result in more land needing to be developed to meet housing targets	14	21

SUMMARY OF RESPONSES (88 received)

There was a decidedly mixed opinion on this policy with some supporting a general increase in density to help meet housing needs, particularly where it would be in good proximity to public transport and major centres of employment. Some went further and suggested that the density levels proposed were still too low. There were also some who suggested that the density levels proposed for the 'rest of the city' could be too low in some circumstances and that there may be some sites which could support higher densities meaning a more flexible consideration of site-specific circumstances was needed. However, a notable number of responses did not support higher densities raising concerns about the impacts this would

have on Southampton's character as well as increasing pressure on infrastructure and services. Some did not consider higher densities to be the right solution for housing citing the failures of various national high-density developments over the past few decades and that they would have a negative impact on quality of life. There was also a criticism of nationally imposed housing targets necessitating higher densities and suggestions the Council should ignore these targets. Another point of view was that density should be gently increased across the city to create a more uniform density for the city as a whole.

There were also mixed opinions on how higher densities should be achieved. Some supported the use of tall buildings and were even excited by the potential of new architecture to raise the profile of the city. However, others thought mid-rise development would be more appropriate for the city, to bridge the gap with existing residential areas. There were also some who did not want to see buildings go beyond 3 to 6 storeys or that the number of new tall buildings should be kept to an absolute minimum. Some suggested a cap on maximum heights that would be allowed in the city. What people were in agreement over is that high density developments, including tall buildings, need to be very well designed and of high quality.

There were also differences of opinion in how higher density development should meet the mix of housing needs in the city. Some favoured still delivering detached dwellings whilst others emphasised the need to deliver more affordable and more smaller scale dwellings, namely 1 or 2 bed units. There were those who did not support the creation of any new 1 storey, or even 2 storey, dwellings where these did not already exist. Whereas, some emphasised the need to still allow bungalows in some areas as a means of providing accommodation for older people that could also free up family dwellings as they downsize.

A critical issue for many was that new higher density developments should not have an adverse impact on existing open spaces. There was support for such developments also making sure to include new open spaces as well as providing sufficient levels of private amenity spaces such as balconies and roof gardens. There were also suggestions that the policy needs to better respond to environmental and heritage constraints and that new higher density developments should be delivered in a sustainable manner. Whilst there was support for allowing higher density development near public transport hubs and routes, some reiterated there would still be a need to provide parking for residents as car free developments were considered to be unfeasible and unattractive to future occupiers.

Some responses found the policy difficult to interpret and considered a more lay approach is needed to the text. Others also identified difficulties in conceptualising the proposed densities and suggested examples of similar densities from within Southampton or elsewhere should be included. There were suggestions that certain parts of the policy text should be amended to prevent potential loopholes where proposals could be watered down, or obligations avoided. It was also suggested that certain terms should be more clearly defined to prevent arguments with developers over how they should be interpreted.

Theme	Homes
Policy Name	Housing Mix
Policy Number	HO2(S)
Options Y/N	Y

HOUSING MIX POLICY OPTIONS	AGREE	DISAGREE
Option 1a – to support proposals for self and custom build homes without identifying specific plots and site allocations across the city – this is the Councils preferred approach whereby the Council would support proposals for self and custom-build as part of residential developments coming forward.	15	9
Option 1b – to identify specific plots and site allocations for self and custom build homes or require a proportion of larger developments to include custom or self-build homes where possible – the Council has opted against this approach to identify specific plots and site allocations.	11	13
Option 2a – to support the 30% family homes percentage target in Policy HO2	15	9
Option 2b – to support an alternative higher or lower family homes percentage target in Policy HO2	6	13
Option 2c – to propose separate targets for family homes in high-density and low-density areas (e.g. higher or lower targets in accessible locations including the city, town and district centres).	12	7
Option 3a – no net loss of family homes across the city unless in exceptional circumstances such as where there are significant wider benefits from a redevelopment that can be robustly justified and the impact on the amenity of neighbouring and nearby residents is acceptable – there is a genuine need to provide for family homes across the city. Many have been lost over the last few decades through conversion into separate flats to meet an increased demand from students and single adults. Therefore, as well as supporting the provision of new family homes, the Council also supports this option as its preferred approach in order to minimise the net loss of family homes across the city.	22	4
Option 3b – support a more flexible approach to the net loss of family homes – this approach would risk more family homes being lost across the city which are already in short supply	3	21
Option 4a – to maintain the Council’s definition of what constitutes a family home	15	9

<p>Option 4b – to redefine the definition of what constitutes a family home in the city centre (e.g. three bed dwellings to incorporate the use of shared communal spaces rather than private usable amenity space)</p>	<p>14</p>	<p>10</p>
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SUMMARY OF RESPONSES (62 received)

On the whole, the majority of respondents were supportive of the policy approach, though many suggestions were made to amend specific elements of the policy to take account of different priorities to deliver better housing choice for all and the right mix of housing to meet the market/social demand for the communities in the city. A spectrum of views expressed where the balance for the percentage level of the family housing mix target should lie with new development according to housing need and delivery constraints. This is further analysed through the comments received under the relevant policy options.

Six strong themes came out of the responses which focused on:

- manage the conflict with family housing in communities affected by high concentrations of HMOs,
- various views on how the format of private and communal garden spaces for housing should be designed, especially in the city centre where there is pressure on parks, including anti-social issues, to compensate for higher density developments with limited residential garden space,
- the definition of family housing should recognise the need to deliver for different sizes and types of families, recognising the need to provide more 1 and 2 bedroom apartments suitable for couples and single persons within the housing mix,
- flexibility needed to develop sites with no family housing in places not suitable for families to live,
- the policy does not directly address the housing needs of certain groups including homeless, older, disabled persons, key workers (e.g. NHS staff), social housing and self and custom build houses, and better recognition of the emergence of new housing models such as build-to-rent (BTR) and co-living, and
- tackle affordability and availability pressures of housing for all types of households and making sure that family housing targets are properly delivered.

There was a mixed response to Options 1a) and b). Housebuilders were generally concerned that without a strategy/site identification their large sites would be burdened by accommodating plots for self and custom homes, whilst other respondents were concerned that sites should be identified to support self-builders and cooperative style housing coming forward.

There was a mixed response to Options 2a), b) and c) in terms of what the overall family housing mix percentage should be for new developments. Whilst respondents sought greater flexibility of the target to recognise that the circumstances of individual sites coming

forward, especially in the City Centre, are not suitable family housing, others were critical that family housing targets should be applied more rigidly to support family housing being built or the targets are not generous enough. Whilst others expressed caution that building more family homes will conversely support the growth of the HMO and short-term landlord market in communities. Respondents were critical of the policy robustness in basing family housing need on the out-of-date SHMA published in 2014. Others were critical that the housing needs of certain groups including homeless, older, disabled persons, key workers (e.g. NHS staff), and those in need of social housing should be better recognised by the policy in the overall housing mix of new development alongside the emergence of new housing models such as BTR and co-living. There were suggestions by retirement housing providers to create a standalone policy outside the housing mix to deliver and identify need for sites to develop older persons housing. Some suggested that BTR and co-living housing should be included under definition of affordable housing in the Local Plan glossary. Others suggested the Council should explore the model of purpose-built housing providing a range of accommodation for different users to live within the scheme alongside older persons and students to create self-supporting communities.

Respondents were generally more supportive of Option 3b) to build in flexibility and exemptions to allow the net loss of family homes to enable sites to come forward with other benefits and recognise the benefits of delivering retirement homes and PSBA in releasing family housing stock used by these groups. That said, representation was made that providing retirement housing is not the only solution for older persons, with suggestions the loss of bungalows outside the City Centre should be resisted to safeguard this housing stock for the needs of older persons. Within communities with high concentrations of HMOs, concerns were raised that the mix and balance of communities could be further upset by losing family homes when landlords decide to convert their HMO stock into flats/studios, whilst more controls should be applied to control the proliferation of short terms let such the Airbnb market. Conversely, further concerns were raised about allowing more family housing near areas of high concentrations of HMOs given the anti-social conflict for families living alongside transient households.

There was a mixed response to Options 4a) and b) in the public perception and within housing builders/market of what a 'family home' should constitute to meet the needs and preference of users. Respondents felt that strictly defining a 'family home' as a 3-bedroom home doesn't fit the need and demand for all types of families in the city and suggested that 2 bedrooms should also form part of the definition. There was a mixed response to the appropriateness of the amenity space standards specified. In terms of living conditions, some considered the standards to be right, whilst others felt that their minimum size wasn't high enough to tackle poor housing conditions. In general, housebuilders preferred Option 4b) for greater flexibility in the family home definition to allow housing development to be maximised on certain sites by relying on communal space where it is not possible to provide private space for families, especially in the City Centre and other areas suitable for higher density housing. Housing providers for retirement and supported accommodation for

disabled persons considered that this housing should be exempt from the amenity space requirements identified in point 3 of the policy, however, schemes must provide high quality amenity space that meets the needs of residents, and supported by appropriate on-site management plan. Respondents felt the standards should further prescribe a higher minimum size and number of living facilities for family housing to tackle poor housing conditions. Conversely, it was suggested that it would be socially better to deliver a uniform type of housing to improve equality for all residents in the city. Although being outside the scope of planning system legislation, it was suggested that the policy could address the affordability of housing by specifying maximum housing and rents prices on reviewable basis.

Theme	Homes
Policy Name	Affordable Housing
Policy Number	HO3(S)
Options Y/N	Y

AFFORDABLE HOUSING POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – overall affordable housing target		
Option 1a – the policy will include an overall affordable housing target of 35%, to be confirmed after further assessments. This continues the current percentage and seeks to meet the housing needs, subject to viability	16	5
Option 1b - the policy will include an overall target of less than 35% due to the difficulties in delivering a viable development achieving the higher target	2	19
Option 1c – the policy will include an overall target of more than 35% due to the extent of affordable housing need in the city	14	6
Key Option 2 – minimum requirements not subject to viability		
Option 2a – the policy includes a target of 35% affordable housing and does not split this requirement further to include minimum mandatory requirements. This seeks to maximise the amount of affordable housing and sets clear expectations about the targets sought	14	4
Option 2b - the policy will set out a minimum affordable housing requirement (to be determined in the Local Plan viability assessment) in addition to the target. Developments not proposing any affordable housing, or not meeting this minimum requirement, will not be permitted. This may 32 deliver some extra affordable housing units however they may be small numbers spread over different developments. It may lead to further challenges on viability grounds	9	10

Option 2c – the Council will consider whether to require high density development above a minimum density per hectare for the part of the city where they are located to fully meet the percentage requirement, not subject to viability. This would prevent schemes which are overdevelopment and where the inclusion of additional homes and storeys makes the affordable housing requirement unviable. However, it could affect the type of housing built and does not set clear expectations about targets to be met	4	12
Key Option 3 – affordable housing requirement from specialist housing		
Option 3a - Affordable housing will be sought from specialist housing including housing with care, supported housing and age restricted housing in order to meet the affordable housing needs of all members of the community (which may include some schemes in use class C2). This is likely to be a commuted sum but could be on-site	14	5
Option 3b – specialist housing will be exempt from Affordable Housing contribution	5	14
Key Option 4 – First Homes		
Option 4a – tenure split will require 25% First Homes and the policy will specify the preferred mix of Social Rent, Affordable Rent and Shared Ownership for the remaining 75% of the affordable housing provision. It will include a local connection text to provide opportunities for residents and Armed Forces employees to access First Homes before they are marketed more widely	16	4
Option 4b – the policy will not require a local connection criterion for First Homes to make First Homes available to people wishing to come to live in the city at the same time as current residents and Armed Forces employees	4	15
Option 4c – the details of the local connection criteria for First Homes will be amended which could include people working in the city or change the residency requirements from a minimum of 3 years	6	9

SUMMARY OF RESPONSES (39 received)

In general, respondents were supportive of the policy approach. A range of views were expressed relating to the flexibility of applying the policy dependent on viability and market conditions, with many supporting the options to allow developments to be viability tested on site specific basis against affordable housing costs to ensure development comes forward where proven unviable otherwise. In criticising this approach, a number of respondents commented that this flexible policy approach fails to deliver needed affordable housing.

Outside the scope of the policy, others linked the importance of delivering good housing standards and energy efficiency alongside affordable housing to tackle social inequalities, suggested there is a need to build more flats to free up the availability of family housing from single occupancy and multiple occupancy households, and for the Council to have greater control over the affordability of homes in the housing market itself.

Respondents have raised criticism that no Local Plan Viability Assessment has been carried out at this stage of the plan making process and, therefore, the suggested affordable housings thresholds and tenure splits set out in the policy and preferred options have not been properly justified. Furthermore, the policy is not based on robust evidence of housing need for affordable homes given the out-of-date baseline data relied upon. Specialist housing providers for elderly persons have stated that their developments should be exempt from affordable housing provision.

Respondents considered there should be a review whether flexibility could be built into the policy to allow for different proportions of each tenure to be delivered in response to local need, affordability, and viability. Furthermore, the supporting text should more explicitly support the full range of housing and supported accommodation types to meet needs, including bungalows. It was suggested that section 2b of the policy should specify what constraints on the development of the site imposed by other planning objectives will be considered by the policy. As an alternative to the policy threshold, it was suggested to set a variable affordable housing target by defined location across the city supported by the Local Plan Viability Assessment as well as a minimum requirement, not subject to viability assessment, set with clear exclusion zones, potentially based on City Centre Quarters or specific allocations where the minimum requirement would not be applicable.

It has been questioned whether 'First Homes' will successfully address affordable housing need given that the discounted house prices still prove to be unaffordable for most and therefore does not deliver mixed and balanced communities, whilst 'First Homes' are not a mandatory requirement by the government so this should be an optional policy approach for local authorities. Furthermore, it is suggested that reductions in the level of 'First Homes' required in the policy, or across individual sites, would protect the overall level of affordable housing delivered on sites, which would otherwise be lost to market sale following the marketing period, further reducing the opportunities for sustainably located affordable housing within the city. Concerns are raised that 'Build to Rent' requirement to provide 35% affordable housing is non-compliant with the National Planning Practice Guidance, as this states that '20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme'.

Theme	Homes
Policy Name	Conversion to Residential Use
Policy Number	HO4
Options Y/N	Y

CONVERSION TO RESIDENTIAL USE POLICY OPTIONS	AGREE	DISAGREE
Option 1a – to promote a range of housing types within conversion of non-residential properties to residential use throughout the city – the Council acknowledges there is a wide range of housing needs including by tenure and property size. This approach could also deliver more family homes in the city centre. This is the Council’s preferred approach subject to further evidence being undertaken on housing needs for instances where permitted development rights do not apply.	15	1
Option 1b – to maximise the provision of smaller properties and flats within conversions of non-residential properties to residential use throughout the city – this approach is less preferable since it would not allow for a range of housing types to be developed for meeting wider housing needs.	4	12
Option 1c – to maximise the provision of smaller units in the city centre and a wider range of housing types throughout the rest of the city – the Council is open to seeing whether this approach could be preferable to Option 1a subject to further evidence being undertaken on housing needs. However, it might not result in the creation of many family homes in the city centre.	6	10

SUMMARY OF RESPONSES (23 received)

On the whole, the consultation responses supported the objectives of the policy in recognising the benefit of delivering a range of housing by repurposing under-utilised non-residential premises within sustainable transport locations, and the balancing act of sensitively locating residential uses in busy commercial areas. Caution was aired about ensuring safeguards can be put in place in locating residential uses near commercial uses, including the Port.

There are conflicting views in how much parking should be provided for future residents, with some supporting car-free development near transport hubs whilst others consider that provision of car parking is essential for work and life.

Views were expressed about permitted development rights undermining the planning system by relaxing the protection of shopping areas and creating poor quality housing. Furthermore, the Council should explore using Article 4 powers to limit the impact of permitted development rights.

It was suggested that the policy should focus on maintaining ground floor commercial uses and residential uses above as these uses have complimentary benefits for each other.

Statutory bodies have expressed the importance of linking up other relevant policy areas including flood risk and water supply/drainage in planning new conversions.

Theme	Homes
Policy Name	Housing Retention
Policy Number	HO5
Options Y/N	Y

HOUSING RETENTION POLICY OPTIONS	AGREE	DISAGREE
Option 1a – supporting all the proposed exceptions allowing the loss of housing as set out in Policy HO5. This allows for flexibility in all those circumstances in which it may be acceptable for housing units to be lost as a blanket restriction on loss of housing would be overly restrictive and could hinder important developments coming forward that would deliver significant public benefits. However, if such developments occur this would necessitate more housing being delivered elsewhere to ensure housing targets are met	7	4
Option 1b – supporting only some of the proposed exceptions allowing the loss of housing as set out in Policy HO5. This would reduce the scope of where the loss of housing would be acceptable thereby helping to retain housing stock. However, it may not be flexible enough to capture all circumstances where loss of housing may be appropriate to support development that could offer significant public benefits	4	6

SUMMARY OF RESPONSES (18 received)

Whilst the policy approach was supported, a number of issues and themes surrounding the loss of family and availability of local housing came out of the consultation. There was support for encouraging greater densities on sites where housing is to be replaced, with encouragement to extend buildings upwards to add more floors. Some of the concerns raised fall outside the scope of the policy such as preventing ownership of second homes and limiting the residential status of homeowners to the city, changing the planning rules for Airbnb and short term lettings, and limiting Houses in Multiple Occupation. Others questioned the mechanism for ensuring the delivery of replacement homes within a development, and allowing larger homes will proliferate more Houses in Multiple Occupation and flatshares.

Theme	Homes
Policy Name	Houses in Multiple Occupation (HMOs)
Policy Number	HO6
Options Y/N	Y

HOUSES IN MULTIPLE OCCUPATION (HMOs) POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Threshold to prevent overconcentration of HMOs		
Option 1a – incorporating a 10% threshold into the Local Plan to prevent an overconcentration of HMOs in a locality (i.e. the application site and its surrounding residential properties) that could otherwise unbalance the mix of family and transient households in a neighbourhood. By including this threshold in the Local Plan rather than just the Houses in Multiple Occupation SPD it ensures it will have a strong and clear bearing in the determination of any relevant planning applications. However, due to the complexities of the Local Plan and the requirement for it to be independently examined, the threshold cannot be easily or quickly updated if there is a need to change it	17	1
Option 1b – retaining the 10% threshold only as supplementary guidance in the Houses in Multiple Occupation SPD rather than incorporating it into the Local Plan. This approach would be more agile if the threshold needs to be amended as the SPD can be more easily and quickly altered compared to the Local Plan. However, an SPD does not carry as much weight as the Local Plan in the determination of planning applications.	3	13
Key Option 2 – Secondary threshold to prevent overconcentration of larger Sui Generis HMOs		
Option 2a – introduce a threshold for larger Sui Generis HMOs so that these do not make up more than 50% of the HMOs in a locality (i.e. the application site and surrounding residential properties). This will introduce greater control to prevent overconcentration of larger Sui Generis HMOs but will restrict their prevalence as a housing option for those who would like to live in this sort of accommodation	15	1
Option 2b – introduce an alternative threshold for restricting the number of larger Sui Generis HMOs in a locality. This could allow more flexibility in the provision of larger Sui Generis HMOs but may not provide adequate control to ensure that they do not become overconcentrated in a particular area.	3	12
Key Option 3 – Geographic coverage of larger Sui Generis HMO threshold		
Option 3a – apply the secondary threshold for restricting the overconcentration of larger Sui Generis HMOs in a locality (i.e. the application site and surrounding residential properties) to all Wards of the City. This reflects the current geographic approach to controlling HMOs that is used with the 10% threshold but may be too restrictive for those parts of the City where HMOs are not overly concentrated	12	4

<p>Option 3b – only use the secondary threshold for larger Sui Generis HMOs in those Wards that have high concentrations of HMOs. This takes a targeted approach to address the overconcentration of larger Sui Generis HMOs in those areas of the City where it is an established issue. However, this may not provide adequate protection for other parts of the City where there is not generally an overconcentration of HMOs at the current time but if this becomes an issue in the future it would not be quick or easy to amend the Local Plan policy to address it.</p>	6	10
<p>Key Option 4 – Restricting extensions to HMOs where the 10% threshold has already been breached</p>		
<p>Option 4a – in those areas where the 10% threshold has already been breached, to not grant planning permission for applications that would seek to extend existing HMOs in order to increase the number of occupiers to become a larger Sui Generis HMO. This would help prevent the incremental negative impacts to character, amenity and parking pressure that arise from increasing the number of occupiers in HMOs in areas which already have an imbalance between family and transient households. However, this would be taking a blanket approach to try to resolve this issue</p>	15	2
<p>Option 4b – not applying a specific restriction on extending HMOs in those areas where the 10% threshold has already been breached. This would allow applications to be considered on a case-by-case basis in line with the current approach but may not provide a strong enough policy basis to prevent the incremental negative impacts to character and amenity that can arise from extending HMOs to create larger Sui Generis HMOs.</p>	2	14

SUMMARY OF RESPONSES (34 received)

The main themes voiced in the consultation responses ranged from meeting housing need with issues surrounding lack of affordability and shortage of housing suitable for lower income persons leading to greater pressure for HMO housing in the city, redressing and restoring the erosion of unhealthy mix and balance of communities in the interests of improving the living conditions of longer term family households affected by high concentrations of transient people and more action needed to reverse the damage to neighbourhoods from the negative affect of long term high concentrations of HMOs, improving standard of housing and living conditions for existing and future HMOs, potential continuation of same community and housing imbalances allowing HMO stock to be converted by landlords to small flats as the HMO market changes, the effectiveness of using joined up enforcement powers from other Council teams to tackle common social and environmental issues associated with HMOs including changing rules for issuing HMO licenses to act with planning enforcement cases and tougher penalties for landlords, and fostering better relationship between long term residents and short let landlords. It was

recognised that HMOs offer important source and choice of short term housing for lower income persons including university students.

In terms of the evidence base informing the policy, there was concerns this must be representative of those who use HMOs. There was agreement with the Council that policy intervention was still necessary to control the negative impacts associated with the proliferation of HMOs over the city and especially those neighbourhoods where the healthy mix and balance has already been upset. To accurately establish the overall number of HMO and short terms lets, the Council must conduct an up-to-date assessment of the total number of HMOs in the City across the total housing stock to feed into the Local Plan before it is published.

The proposed methodology to control the future increase of large HMOs received comments with regards to effectiveness of geographic targeting at neighbourhood level and capability to prevent further erosion of unhealthy mixed and balance communities, especially associated with wider impacts from significantly increased adult population putting pressure on local services and infrastructure.

There was a mixed response to Options 1a) and b), with both support for putting the threshold policy into the Local Plan and others preferring to use the flexible SPD route in recognising its agility to take account changes in circumstances. Comments were received calling for the geographic targeting of the threshold for new HMOs to cover a wider neighbourhood area or up to ward level as the 40m radius was not effective to achieve the policy objective of maintaining a healthy mix and balance of households in neighbourhoods, especially those already affected by high concentrations of HMOs.

On the whole, introducing a new strategy to control overconcentration of larger HMOs was welcomed under Option 2, with others who thought the that policy would be a 'back door' to increasing concentrations of HMOs so they preferred that no more large HMOs were created or occupancy increase in existing large HMOs. Concerns were raised that the high percentage of the tipping point set for the secondary threshold would not achieve the policy objective of maintaining a healthy mix and balance of households in neighbourhoods due to the significant increase of the HMO concentration, especially those neighbourhoods already affected by high concentrations of HMOs. Suggestions were made to decrease the 'tipping point' threshold for new large HMOs to lessen the impact of increasing HMO concentrations, and to omit the use of the 60% upper limit for the secondary threshold to better protect communities from increasing HMO concentrations in neighbourhoods already affected by high concentrations. Others have reserved their comments on the policy about the secondary threshold until they know more detail of its methodology.

There was a mixed response on Option 3 to geographically target the assessment of the secondary threshold for large HMOs. As an alternative to the current 40m radius approach at a local neighbourhood level, there is a preference that the policy should target the assessment at a broader geographic level such as Wards in order to limit wider concentration and prevent further dilution of the family housing stock across the city. Others

have reserved their comments on the policy about the secondary threshold until they know more detail of its methodology.

There was a mixed response to the Option 4. Concerns were raised that extending HMOs will exacerbate the unhealthy imbalance in neighbourhoods with high concentrations of HMOs above the 10% threshold. Otherwise, the view is taken that a case-by-case assessment in isolation to the threshold policy will allow the impacts of HMO extensions to be considered in line with the Council’s adopted standards and policies.

A range of other policy text suggestions have been raised in the consultation responses. These mainly suggest the Council consider other HMO policy interventions which would go beyond the scope of planning legislation or land use matters. Other issues raised such as standards on minimum size of living spaces or communal facilities for HMO residents are already covered by the Council’s HMO licensing scheme. In response to further concerns about the implementation of the HMO policy, the wording does not explicitly state a ‘presumption in favour’ of permitting HMOs, however, the NPPF (2023) paragraph 11 setting out the higher level of national policy requires all planning applications decided by the Council to ‘apply a presumption in favour of sustainable development’, and this means for decision making ‘approving development proposals that accord with an up-to-date development plan without delay’.

Theme	Homes
Policy Name	Purpose Built Student Accommodation
Policy Number	HO7
Options Y/N	Y

PURPOSE BUILT STUDENT ACCOMMODATION POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – The location of student accommodation		
Option 1a – to focus the provision of new PBSA in the city centre – this is the Councils preferred approach in order to ensure the creation of vibrant and balanced community	9	3
Option 1b – To let the market determine where new PBSA is developed within the city including in areas outside of the city centre – this option is less preferable to the Council due to the community imbalance that could be created in the city suburbs. The provision of more PBSA in these locations could potentially place a wider unacceptable strain upon local facilities or have an unacceptable impact upon local amenity	2	9
Key Option 2 – Adaptability of PBSA to allow future conversion to short term tourist accommodation		

<p>Option 2a – The policy to condition PBSA to be used for other uses such as for overnight stays – this is the Councils preferred approach which would allow PBSA to be conditioned upon approval so that it can be used as short-term tourist accommodation during the summer break once students vacate at the end of term. This approach would allow for balanced and socially cohesive communities which would remain vibrant throughout the year. This approach would also help to strengthen the appeal of the city as a destination for overnight stays and support the Cruise industry.</p>	<p>13</p>	<p>2</p>
<p>Option 2b – The policy to not include a requirement to condition PBSA to be used for other uses such as for overnight stays – there are no disadvantages to this approach. However, it would not maximise the benefits offered through short-term tourist stays</p>	<p>2</p>	<p>12</p>

SUMMARY OF RESPONSES (32 received)

Most respondents supported student housing need within the city, however, there were mixed views over the appropriate location for future student housing sites. Representatives of the student housing providers and the University bodies were unsupportive of a City Centre focus as this would locate student housing further away from University campuses and, therefore, increase travel time for students, and students will lose the opportunity to live near existing ‘student villages’ in north of the city with access to a range of affordable options and accommodation. Respondents living in suburban areas near the university campuses raised concerns that allowing more student housing to locate outside the City Centre will lead to further community imbalances and negative amenity impacts within nearby suburban neighbourhoods. Others considered that locating student housing in the City Centre will create its own community imbalances whilst this makes housing unaffordable for non-student residents due to an overconcentration of sites.

Student housing providers are concerned that there is an insufficient evidence base to include and clarify the quantum of existing and required student accommodation over the plan period and, therefore, the policy will fail the test of soundness without an objectively assessed needs for student housing. So that student housing market providers are clear where they can invest, it was suggested that supply and demand of student accommodation is addressed in the City Vision with allocation of student housing sites alongside the supply and demand for general market housing.

The University of Southampton considers that the assessment of student housing need should change to take into account how academic floorspace is specifically used or created as student population is not directly linked. An established evidence baseline can demonstrate whether the floorspace proposed is for accommodating existing or additional student numbers and the University are able to therefore provide accommodation as appropriate and required to do so. The University expressed interest in exploring options for

student housing being part of mixed-use developments and where there may be appropriate future synergies across Southampton. Furthermore, it was suggested that the policy reiterates the need to support necessary facilities near to student accommodation, such as small convenience stores and health and wellbeing facilities.

Respondents were mainly supportive of the policy approach to encourage student housing to be short-term tourist accommodation during holiday periods, this being subject to placing no specific burdens on building design. Student housing providers were unsupportive of the policy approach to make student housing adaptive for future residential use given the conflicting design approach in layout and residential standards including amenity space requirements, whilst they consider there is a significant need for student housing well beyond the plan period so it is unlikely the accommodation will not be required for students and made available for general housing. Conversely, the benefit of student housing is to free up housing stock by reduction in need for student Houses in Multiple Occupation in suburban areas. Concerns were also raised that the non-specific reference to a ‘high-quality living environment’ in the policy is too vague to be effective. As an alternative to specifying precisely the size of rooms/communal areas, it was suggested using the phrase “appropriately-sized rooms” as it allows the decision-maker to draw on precedent developments with a view to understanding what the market expectation is for room sizes.

In a wider context of the student housing market, respondents commented on the importance of building more student housing to make up the shortfall of accommodation to free up family housing in suburban areas being used as student house shares, however, further student housing built will remain empty as the accommodation is unaffordable so students will tend to live in cheaper house shares. Criticism was raised of low standards created due to over-reliance on offshore real estate providers rather than university led and maintained student housing which can be subsidised for students. Other suggestions made such as controlling rent costs for students fall outside the scope of the planning system.

Other concerns associated with student housing were raised around negative impacts to amenity, safety and character for local communities. These include poorly designed utilitarian buildings, parking pressure for nearby residential streets due to a lack of off-road parking for students, and poor management of noise disturbance and anti-social behaviour issues including late-night when students return home from nights out through residential areas. It was suggested that permissions for student housing should specify a minimum number of management and security staff to minimise anti-social behaviour issues.

Theme	Homes
Policy Name	Gypsy and Traveller Accommodation and Accommodation for Travelling Showpeople
Policy Number	HO8
Options Y/N	Y

GYPSEY AND TRAVELLER ACCOMMODATION AND ACCOMMODATION FOR TRAVELLING SHOW PEOPLE POLICY OPTIONS	AGREE	DISAGREE
Option 1a – provide 5 additional pitches at Kanes Hill and establish criteria for providing further pitches in Southampton where they meet additional unmet need. This allows the Council to address the need identified in the Gypsy and Traveller Accommodation Assessment 2021 whilst establishing a process to address any further unmet need that could arise in the future. It would mean the exact location of any additional pitches is addressed in an ad hoc basis and depends on where future planning applications come forward	8	2
Option 1b – identify land for further pitches in addition to the 5 extra pitches proposed at Kanes Hill. This allows the Council to provide for additional pitches in a planned manner but would result in more pitches being allocated than currently identified needs require	6	4

SUMMARY OF RESPONSES (10 received)

There was general support for the policy approach, with other comments suggesting that transient facilities should be further considered to better manage the potential for unauthorised encampments, including using permanent sites as a transit site to direct groups in need of medical treatment.

Theme	Homes
Policy Name	Houseboats and Moorings
Policy Number	HO9
Options Y/N	N

SUMMARY OF RESPONSES (6 received)

There were no objections to the policy, but some felt the need for more detail around issues of foul water and waste and design and structure of houseboats. Overall, the policy was considered a positive and could add to regeneration of parts of the city.

**SOUTHAMPTON
CITY VISION**
Local Plan



ECONOMY

Theme	Economy
Policy Name	Office Development
Policy Number	EC1(S)
Options Y/N	Y

OFFICE DEVELOPMENT POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – the office target		
Option 1a – 61,000m ² – this is the aspirational need identified by the PfSH Statement of Common Ground and Economic, Employment and Commercial Needs Study (2021).	7	9
Option 1b – 78,000m ² – this higher aspirational target reflects a ‘cities first’ approach. The PfSH needs study for offices was based on a labour demand approach, which resulted in Eastleigh having a higher need identified than Southampton. This option seeks a ‘cities first’ policy steer by setting a slightly higher aspirational target for Southampton. This may be considered a realistic uplift to support city centre growth. The policy contains sufficient flexibility to ensure sites are not needlessly safeguarded for office use	8	7
Option 1c – should a target lower than 61,000m ² be considered? This could reflect ongoing changes in the office market following the Covid-19 pandemic. However, it would not align with the PfSH Statement of Common Ground, the aspirations for growth as forecast over the medium and longer term, or the ‘cities first’ approach. If the higher targets in options 1a or 1b were selected, the policy contains sufficient flexibility to ensure sites are not needlessly safeguarded for office use. The sites identified in Table 3 can accommodate either of these targets.	10	8
Key Option 2 – The level of requirement for office development on individual sites		
Option 2a – support office development at the Central Station hub without requiring office development – this creates the maximum flexibility to support overall development but risks not delivering office development if the commercial market prioritises other uses	13	3
Option 2b – require that “50%” or “a significant proportion” of development at the Central Station hub is for office use – this may ensure that office development is delivered on this key site but risks an inflexible approach to supporting overall development if office development is not viable. However, this approach could include flexibility on a case-by-case basis, as set out in the “Further Considerations” section below	7	9

SUMMARY OF RESPONSES (30 received)

There was a mixed response to this policy. Whilst some supported the proposed approach, others questioned the need for additional office space, particularly given increased levels of home working following the Covid-19 pandemic, and perceptions of high vacancy levels within existing offices. Consequently, there was a general desire to see more research and analysis undertaken to justify the proposed levels of office space. There was however a recognition that levels of required office space are to a certain extent dependent on demand within the market. Therefore, some suggested that new office buildings should be developed with a degree of flexibility to better transition between office and residential or other uses depending on need and market demand. Some even suggested using the preparation of the City Vision as an opportunity to identify office space that is no longer fit for purpose and allocating that for conversion to alternative uses such as residential.

With regards to new offices some expressed a want for more affordable space and spaces of different sizes to help meet the needs of small and startup companies. Some also suggested ensuring new offices include facilities that would benefit employees such as affordable eateries. Business groups requested the allocation of new Grade A office space and a conference and events centre as well as greater protections for existing office space from conversion under permitted development. Some responses requested that policy be used to help deliver specific accommodation for high-tech industries such as the life sciences sector.

There was a mixed opinion regarding where new offices should be located with some supporting the suggested locations in the City Centre and particularly around Central Station. However, others suggested a more distributed pattern across smaller centres and near public transport interchanges in other parts of the city to reduce the need to travel to the City Centre.

Some responses made suggestions as to how existing areas with offices could be made more attractive including improving the quality of street lighting. Others suggested finding greater efficiencies for office use amongst public sector bodies by exploring opportunities for shared office spaces.

Theme	Economy
Policy Name	Industrial Sites
Policy Number	EC2(S)
Options Y/N	Y

INDUSTRIAL SITES POLICY OPTIONS	AGREE	DISAGREE
Option 1a – continue to safeguard all the currently designated industrial sites. This would protect the most industrial areas / existing jobs within the city. However, it may mean that opportunities to deliver regeneration or amenity benefits are lost	6	6

<p>Option 1b - release some or all of the industrial sites with regeneration potential. These could be redeveloped to form high quality higher density residential and mixed-use development in the central and waterfront areas of the city, including the city centre and Itchen Riverside Quarter. This would help to maximise new development and deliver more homes, bringing wider benefits in terms of economic investment, regenerating key areas, and locating development relatively close to jobs, services and public transport. However, it would also mean the loss of industrial areas and jobs.</p>	9	3
<p>Option 1c – release some or all of the smaller industrial sites in residential areas. These could be redeveloped for residential uses. This could enhance the amenity of the surrounding residential areas and deliver more homes. However, it would mean the loss of some smaller industrial areas which may currently offer cheaper business accommodation, and jobs.</p>	4	8
<p>Option 1d – release some or all of the industrial sites with regeneration potential and the smaller industrial sites in residential areas. This would do most to realise the benefits outlined in options 1b and 1c. However, it would mean the loss of the most industrial areas and jobs</p>	1	10

SUMMARY OF RESPONSES (23 received)

There was general support for the overall principle of the policy to safeguard industrial sites so they continue to provide employment opportunities within the city. There were however mixed opinions with regards to how much employment land should be released for regeneration and potential redevelopment to other uses. Some saw opportunities to improve public access to the waterfront whilst others cautioned that releasing too much industrial land would be detrimental to aims to grow the working population of the city. Some expressed a desire to see any change of use retain the existing building and convert it to preserve the industrial heritage of the city.

Amongst those who made specific comments on the proposed options, the most popular was Option 1b which would see the release of some or all of the sites with regeneration potential. This echoes the general sentiment in comments that some sites should be released for alternative uses but recognising the need to still retain some sites to ensure a continued employment base. Some comments made suggestions as to which sites should be prioritised for release. This included smaller sites, those that are hemmed in by existing residential development and those that are less accessible and reliant on car travel by employees. Some highlighted the need to have a comprehensive approach to releasing industrial sites to avoid repeating the piecemeal redevelopment that has happened in the past.

A mixed range of responses were received from developers, mainly supporting the proposed approach where their site was proposed for release and disagreeing with the policy where this was not the case.

Suggested amendments to the policy included making greater cross reference to the Hampshire Minerals and Waste Plan and making a specific reference that flood defence infrastructure would be acceptable development within safeguarded sites. There were also suggestions that improvements should be made to existing industrial sites with regards to lighting and their accessibility by bus. Opportunities to bring new industries into the city should be explored, particularly those related to the green economy or that could make good use of Southampton's waterfront location.

Theme	Economy
Policy Name	Marine Sites
Policy Number	EC3(S)
Options Y/N	N

SUMMARY OF RESPONSES (9 received)

There are no clear objections to the policy, but a number of mixed responses. Whilst there is recognition that sites should be protected for marine use, more flexibility is sought, perhaps with other uses or attractions being considered. Again, the desire for more access to the waterfront and public transport to connect to it came though in the comments. There was concern from one respondent that there was a slight inconsistency with the Hampshire Minerals and Waste Plan and the safeguarding of a site. Another concern was in regard to sustainability and the need to encourage the green economy.

Theme	Economy
Policy Name	The Port
Policy Number	EC4(S)
Options Y/N	Y

THE PORT POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – the balance between the Port and the city		
Option 1a – Prioritise the needs of the Port over the city – this recognises the national importance of the Port but risks undermining the needs of the city, its residents and other businesses;	0	15

<p>Option 1b – Enable the strength of positive benefit to the locally / regionally important city to outweigh the strength of negative effect to the nationally important Port – this reflects existing policy and enables a balanced approach to be taken where for example there are major benefits to the city and minor disbenefits to the Port.</p>	16	1
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SUMMARY OF RESPONSES (29 received)

There was a mixed response to this policy with some supporting the growth of the port and the potential economic benefits whilst others believed the port is being unduly prioritised over the needs of residents. Some suggested that the nature of the proposed growth at the port needs to be better defined within policy. There were repeated calls for the environmental impacts of the port to be addressed and for a greater level of openness from the port's operators as to how it is run and how it is delivering benefits for the city's residents. Consequently, of those who made comments on the proposed options the majority supported Option 1b which reflects existing policy allowing development that would have major benefit for the city even when it would have minor disbenefits to the port.

Whilst some expressed support for the expansion of the port into areas outside of the city at Dibden Bay, others queried the deliverability of this expansion. They suggested the City Vision should not be overly reliant on this expansion and should set out alternative approaches for supporting economic growth at the port.

There were a number of points raised about how the port interacts with surrounding land uses. Some wanted uses within the port to be intensified to avoid the need for any further expansion of the port's boundaries within the city. Residential development near the port was not supported due to perceived pollution issues. There was a desire for new amenities and attractions to be delivered as part of opening up access to the waterfront. Port related heritage was seen as a benefit and its retention was supported to help increase the attractiveness of the waterfront.

Several responses raised concerns regarding the implementation of the proposed Freeport. Some responses also requested a review of permitted development rights at the port, including those of the Freeport, to better enable the proposed approach to this policy.

Theme	Economy
Policy Name	Social Value and Economic Inclusion
Policy Number	EC5
Options Y/N	Y

SOCIAL VALUE AND ECONOMIC INCLUSION POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Social Value Statements		
Option 1a – not to require Social Value Statements – this could mean that opportunities are missed for developments to add economic and social value	1	13
Option 1b – to require Social Value Statements as set out in the policy – the requirement is to prepare the Statement. The policy provides the flexibility to enable developers, the Council, communities and partners to work together to identify enhanced economic and social benefits which are of mutual benefit.	13	2
Option 1c – to require specific outcomes from a Social Value Statement – this may strengthen the policy but arguably goes against the underlying aim, which is for developers, the Council, communities and other partners to work together to identify measures of mutual benefit at an early stage, which are tailor made and relevant to the specific development	5	5

SUMMARY OF RESPONSES (21 received)

The comments indicate general support for considering social value in planning applications. However, some comments did raise queries about how proposed actions set out in Social Value Statements would be monitored and enforced. It was suggested these actions should be required to meet specific outcomes and that progress against them should be made publicly available.

There was some concern that the approaches to growth suggested in the City Vision may not deliver social value and that previous approaches, with an emphasis on securing investment from large and multi-national corporations, has not led to money being retained within the local economy and has displaced local businesses.

Several comments supported using the policy as a means of upskilling the local workforce and ensuring the creation of meaningful work and high skilled jobs. There were suggestions of specific themes that should be addressed through this policy including the environment, culture and health. The role of the VCSE sector was highlighted in how it can help support the implementation of a social value approach.

Theme	Economy
Policy Name	Meanwhile Uses
Policy Number	EC6
Options Y/N	Y

MEANWHILE USES POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Policy requirement		
Option 1a – omit Policy EC6 from the Local Plan as the introduction of further legislation allows greater flexibility within and between Use Classes and this approach is no longer necessary. This would avoid prescribing an approach for meanwhile uses that is already addressed through legislation but would limit the Council’s ability to guide and control the use of meanwhile uses, in particular those that may not be covered by legislation	2	6
Option 1b – retain Policy EC6 to guide meanwhile uses for completeness and clarity. This would give the Council a greater ability to guide the development of meanwhile uses so they reflect local circumstances but could reduce the level of flexibility that Government changes sought to achieve.	9	1
Key Option 2 – Sequential Test		
Option 2a – introduce a sequential test criterion to ensure temporary uses occur in suitable locations. This would help ensure that temporary uses would be supporting the vibrancy of designated centres in the first instance but could prevent such uses benefitting temporarily vacant sites or units in other locations.	6	3
Option 2b – do not introduce a sequential test criterion in the recognition of the temporary nature of meanwhile uses. This would ensure flexibility to allow any appropriate sites or units in the city to still be productive where they are temporarily vacant however this could undermine the vibrancy of designated centres whilst the temporary use is in operation	3	4

SUMMARY OF RESPONSES (11 received)

There was support for the approach by this policy with suggestions around ensuring meanwhile uses are flexible, made available for meaningful periods of time, are prioritised for local businesses and can support the VCSE sector. Several comments emphasised the importance of engaging with neighbouring communities on proposals before making a decision as to whether they should be permitted.

SOUTHAMPTON
CITY VISION

Local Plan



INFRASTRUCTURE

Theme	Infrastructure
Policy Name	City Centre Approach
Policy Number	IN1(S)
Options Y/N	Y

CITY CENTRE APPROACH POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – The Overall Scale of Development Growth		
Option 1a – High-quality growth (Maximum development) – This would do the most to maximise the benefits of focussing development in the city centre. To make the best use of city centre space in development terms, this would mean promoting more taller buildings, minimising additional car parking provision, and creating high quality city parks rather than larger areas of open space	10	13
Option 1b – High-quality growth (Less development) – This would still achieve benefits from focussing development in the city centre, although to a lesser extent than option 1A. However, it would enable some larger areas of open space to be created. It would also enable more car parking to be provided which will benefit car users (but would not encourage the use of alternative modes of travel).	12	10
Key Option 2 – The Mix of Growth		
Option 2a – Residential-led mixed-use development – This would do the most to help meet the high levels of housing need in the city and South Hampshire, and would increase the number of people living in the city centre able to support the shops, leisure and other facilities and create more 4 HCC Small Area Population Forecast 2020 5 BRES 2020 (Number of employees) 77 ‘vibrancy’. Additional retail, leisure and office development to serve the wider area would still be planned for, using more cautious forecasts of what is needed. This minimises the risk that land is left unused but risks losing the opportunity to attract wider economic investment to the city	17	5
Option 2b – Mixed residential / retail / leisure / office development – This would encourage wider economic investment in the city, using more optimistic forecasts of retail / leisure / office need. This could support more jobs and would enable a greater mix of activities, which would also create more ‘vibrancy’. It would mean that fewer housing needs were met in the city centre, placing more pressure on other sites, and risk leaving some land unused if there was no demand for the additional retail / leisure / office development.	7	15

SUMMARY OF RESPONSES (50 received)

In general, the respondents had a mixed view over the future direction of the City Centre growth strategy. A number of respondents considered that there should be more growth of leisure and cultural uses, and greater support for retail growth and creative enterprises. This includes supporting independent businesses to move closer to the centre of the shopping area where they currently operate on the periphery, and create a better tenant mix strategy to repurpose empty buildings. It was recognised that the quantum of new shopping floorspace should be informed by the updated retail study which was seen as essential in determining future retail needs in the context of this policy. There was a mixed view on supporting growth of the night time economy with respondents identifying economic benefits and social disbenefits. Others considered it imperative for major development sites to come forward in the short-term such as Royal Pier and associated improvements to Mayflower Park. A number of respondents were critical of the over-concentration of student housing in the City Centre.

Concerns were raised around how the growth strategy for higher densities with taller buildings and greater demand for parking can properly safeguard particular historic and environmental assets, including the Central Parks, from further overcrowding of buildings and people. In particular, it was suggested that the policy should make it clear that the Old Town is to be kept separate and protected from the overall City Centre growth strategy. Respondents considered that greater importance should be given to greening up new public realm and frontages and delivering green infrastructure in the City Centre. Furthermore, they questioned whether the aspiration of creating landmark buildings can be achieved based on 'bland buildings' being built in the City Centre. Others were concerned that there was limited provision for routine upkeep of the public art works, and suggest existing works require identification as to title, year and artist.

The University of Southampton expressed its concerns that the policy wording should give greater opportunities for taller buildings to be built outside the City Centre to facilitate its own campus growth strategy. Respondents considered that the growth strategy needed more focus on reducing traffic congestion in the City Centre and improving travel in and out for public transport and pedestrian/cyclists, including the creation of park and rides. Respondents considered that the growth strategy should be better linked to mitigation of future environmental impacts including climate change and flood resilience in the City Centre. This included prioritising reuse of buildings to save embodied carbon, and the policy should include more reference to other flood defences from a variety of sources of flooding not just the RIFAS extent.

Theme	Infrastructure
Policy Name	City Centre Primary Shopping Area Expansion
Policy Number	IN2(S)
Options Y/N	Y

CITY CENTRE PRIMARY SHOPPING AREA EXPANSION POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Scale of Retail Growth		
Option 1a – Lower Retail Growth – This will create more space for a wider mix of other uses in the city centre, including more restaurants / bars, business space and new homes close to public transport, and will avoid planning for major retail expansion which might undermine the existing shopping area. However, if we do not plan for the retail growth which is needed it will go to other centres, out of centre locations or ‘online’, which could itself undermine the success of the city centre.	6	2
Option 1b – Higher Retail Growth – This will enhance the city centre as a vibrant shopping area and locate shops close to public transport. However, if we plan for too much retail growth this could ‘squeeze out’ a wider mix of other activities which could itself undermine the vibrancy of the centre. Major retail expansion could also undermine the city centre’s existing shopping area	1	7
Key Option 2 – Extent of the Existing Primary Shopping Area (PSA)		
Option 2a – Define the ‘existing primary shopping area’ as at present – This would be based on the existing PSA and so would include the former Debenhams store and the site of the former East Street Shopping Centre. This larger area might mean that more retail growth could be focussed on this existing PSA first, including on these sites, rather than an expansion of the PSA into the Mayflower Quarter. This might help to support the existing East Street shopping street. However, the former Debenhams store and former East Street Shopping Centre site are some distance from the main shopping areas and it may be unlikely that they could attract modern retail developments. A significant part of the former East Street Shopping Centre and surrounding area has already been developed for non-retail uses	1	7
Option 2b – Define the ‘existing primary shopping area’ as a smaller area than at present – This would reduce the size of the existing primary shopping area and exclude the former Debenhams store and East Street Shopping Centre sites. This smaller area might mean that less retail growth would be focussed on the existing PSA first and that more would be located in an expansion of the PSA in the Mayflower Quarter. However, the Mayflower Quarter, located between the Central Station and PSA in an area of growth, might be more successful at attracting retail investment and still be well connected to the wider city centre. A more flexible approach could be taken to redeveloping the former Debenhams store and East Street Shopping Centre site, to include a greater mix of uses at street level. This might be more likely to attract the investment required to enhance these areas of the city centre	6	2

Option 2c – Are there other options for how the existing primary shopping area is defined?	3	3
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SUMMARY OF RESPONSES (9 received)

There were a mix of responses to the policy proposals. Some responses supported the proposed approach to protecting the existing Primary Shopping Area and it continuing to be the focus for future retail growth to ensure its ongoing vitality. However, others suggested that retail uses should be more distributed across smaller centres as well and that the City Centre should be diversified to support a wider range of uses including those related to leisure and culture.

There were concerns raised about the age of the evidence base that assesses retail and leisure needs. Consequently, some responses suggested that an updated retail and leisure study should be prepared as soon as possible to inform any further iterations of this policy. Concerns were also raised about the potential impacts of expanding the Primary Shopping Area into Mayflower Quarter. Whilst there was recognition of the need to plan in a flexible manner for potential demand in the future, some responses considered there was insufficient evidence at this time to justify such an approach and re-emphasised the need to update the evidence base.

Some responses also used the opportunity to raise other concerns about the City Centre including issues of cleanliness, drunken disorder and begging, although these are outside the control of planning legislation. Others were concerned by potential longer opening hours with Old Town and Commercial Road being specifically identified as areas where 24 hour opening was not needed. There were also responses that expressed ideas for what uses should be provided in the City Centre in the future, with suggestions including an exhibition centre and ice rink.

Theme	Infrastructure
Policy Name	City, Town, District & Local Centres
Policy Number	IN3(S)
Options Y/N	Y

CITY, TOWN, DISTRICT AND LOCAL CENTRES POLICY OPTIONS	AGREE	DISAGREE
Option 1 - Local Centre destinations - as defined	2	5
Option 2 - Centre boundaries - as defined	5	2

SUMMARY OF RESPONSES (23 received)

There was general support for this policy in recognising the importance of centres and the role they play for local communities. Several responses suggested additional areas of the city

that should be designated as a centre or made comments in relation to proposed boundary changes of existing centres. Some supported the use of a hierarchy to designate centres whilst others questioned the value of doing this or were concerned that this may lead to investment being prioritised in some centres over others. There were suggestions that a community led approach should be taken when determining where centres are designated and what facilities are included within them.

Some responses considered the proposed approach to edge of centre and out of centre development to be too permissive or open to exploitation by developers. However, others supported the approach and found it to be in line with national planning policy. The universities suggested an exception to allow some key ancillary uses to be located within or nearby to their major student accommodation campuses to ensure the day to day needs of the student population are met.

A number of responses raised points around design, mix of uses and transport. There were suggestions around increasing the use of design codes and guidance to improve the spaces in centres whilst others highlighted the importance of such spaces being accessible to all. Some considered that policy needed to restrict the proliferation of certain uses in centres such as off licences, late night takeaways and amusement arcades. There was a desire to see a wider range of facilities in centres including those related to sport, leisure and culture with some suggesting this would better support a 20 minute neighbourhood. It was also suggested that there should be a more responsive and flexible approach to change of use to allow for better curation of vacant and underutilised buildings. Some responses explained the difficulties experienced in using public transport to move between district centres without having to travel via the City Centre.

There was general support for utilising a 20 minute neighbourhood approach to improve the accessibility and range of facilities available to communities. However, some highlighted concerns about the use of different 20 minute neighbourhoods schemes elsewhere in the country and how these were being implemented and did not want to see that type of approach to implementation taken in Southampton.

Theme	Infrastructure
Policy Name	Location of Uses Within Centres
Policy Number	IN4
Options Y/N	Y

LOCATION OF USES WITHIN CENTRES POLICY OPTIONS	AGREE	DISAGREE
Option 1a – Less Flexibility: the policy could allow only specific uses (i.e. as defined in Table 5 row 1). This would maintain a vibrant ‘shopping’ focus for these areas but may restrict the ability of these areas to evolve. For example, other uses (i.e. in row 2) would be prevented even if they could be designed to create a full active frontage	10	13

Option 1b – More Flexibility: the policy could allow a wider range of specific uses in the city centre (i.e. in rows 1 and 2). This would provide greater flexibility for these areas to evolve, but risk allowing uses which contribute less vibrancy to these core areas (if they cannot be designed to achieve at least a significant level of active public frontage).	12	10
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SUMMARY OF RESPONSES (9 received)

Responses to this policy focused on mix of uses and active frontages. Some responses highlighted the need to provide community facilities within centres such as schools, GP surgeries, community halls and places of worship. Others raised concerns that in some centres retail uses were being displaced by leisure uses leading to long rows on non-retail uses, most notably on Bedford Place. There was specific support given by statutory consultees to identifying education as a suitable use for centres. With regards to active frontages, business groups sought protections for these on primary shopping frontages. Statutory consultees sought some clarifications regarding the use of active frontages in education settings and in waterfront areas.

Theme	Infrastructure
Policy Name	Food and Drink Uses
Policy Number	IN5
Options Y/N	Y

FOOD AND DRINK USES POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Resisting the overconcentration of hot food takeaways in Town, District and Local Centres		
Option 1a – resisting the overconcentration of hot food takeaways using the criteria proposed in Policy IN5. This will help address the issues associated with the overconcentration of hot food takeaways by restricting where new hot food takeaways could open but would reduce flexibility, particularly in designated centres, as to what available units could potentially be used for.	4	2
Option 1b – resisting the overconcentration of hot food takeaways using alternative criteria to that proposed in Policy IN5. This may allow for a more flexible approach and could ensure that centres with only a small number of units are not disproportionately affected by the application of this policy but using alternative spatial locations or criteria may not be as effective in managing the overconcentration of hot food takeaways.	2	3

Option 1c – to not introduce measures to resist overconcentration of hot food takeaways. This would be a continuation of the current approach which sees applications for hot food takeaways determined on a case-by-case basis, however it would not provide a defined policy mechanism for addressing the issues associated with large concentrations of hot food takeaways	0	6
Key Option 2 – Resisting new hot food takeaways in close proximity to primary and secondary schools		
Option 2a – resist new hot food takeaways in close proximity to schools as per the approach proposed in Policy IN5. This would support the Council’s strategy for reducing childhood obesity rates but would necessitate additional restrictions on the location of new hot food takeaways that could reduce opportunities for new businesses to open and support the local economy	4	1
Option 2b – rather than outright resist new hot food takeaways in close proximity to schools, require that any new hot food takeaway within the identified buffer zone has planning conditions limiting its 96 opening hours to outside of 15:00 to 17:00 when school children will be travelling home. This would limit young people’s access to takeaway food at a peak time for their potential use of hot food takeaways. However, they could still access takeaway food at these locations at other times and this may result in loitering or anti-social behaviour whilst waiting for hot food takeaways to open.	0	5
Option 2c – only seek to resist new hot food takeaways that are in close proximity to secondary schools rather than both primary and secondary schools. This provides a more targeted approach to controlling new hot food takeaways since secondary school students are more likely to have the means and opportunity to purchase takeaway food. However, this would mean that primary school students could still be exposed to hot food takeaways when travelling to and from schools which could contribute to future unhealthy eating habits.	1	5
Option 2d – to not have specific policy requirement to resist new hot food takeaways in close proximity to schools – this would reflect the current approach where applications for new hot food takeaways are considered on a case-by-case basis however this approach would not provide a definitive policy mechanism for reducing opportunities for young people to access takeaway food and the implications this has on health	1	4

SUMMARY OF RESPONSES (4 received)

There was strong support for this policy with comments recognising the health and wellbeing impacts of unhealthy food that can be offered in some outlets. Comments supported Options 1a and 2a which sought to resist the overconcentration of takeaways and

opening new takeaways in close proximity to schools both using the approach as drafted in the policy.

Theme	Infrastructure
Policy Name	Night-Time and Late-Night Uses
Policy Number	IN6
Options Y/N	Y

NIGHT TIME AND LATE NIGHT USES POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Late-night hub opening hours		
Option 1a – To continue limiting opening hours in late-night hubs to 3am (as per existing City Centre Action Plan)	7	5
Option 1b – To introduce a new opening hours restriction	0	10
Option 1c – To not limited opening hours in late night hub uses to a specific time, but to consider each proposal on its own merits and ability to address any potential negative impacts	6	5
Key Option 2 – Night-time Zone opening hours		
Option 2a – To continue limiting opening hours in night-time zones to midnight	6	8
Option 2b – To introduce new opening hours restrictions which may include extending current closing times from midnight in some areas	8	5

SUMMARY OF RESPONSES (25 received)

There were a number of different opinions on this policy and a few main areas of disagreement with regards to the proposed approach. There were a number of comments that recognised the importance of night time uses to the economy and in making the city a more attractive place to live or visit. However, some comments were concerned that the late night leisure offer in the city was in decline compared to other major cities and that more needs to be done to support the city's independent venues. Some were concerned this decline would contribute to more under 30s leaving Southampton for other major cities.

A significant number of comments requested that Old Town was kept out of the late night hub, particularly those parts that have higher concentrations of residents. Some comments did recognise that late night uses might be acceptable in those parts of Old Town around the waterfront and retail areas where there are fewer residents but this would need to be considered alongside other development proposals such as the Mayflower Quarter and Town Quay regeneration projects. Some of those who commented preferred to retain the current approach to late night uses or did not feel that extended opening hours or intensification of late night uses should occur. Others highlighted that any policy on late night uses will need to be carefully applied to protect the amenity of residents but

conversely some felt that too much weight was being given to the demands of residents in planning decisions on late night uses.

There were a number of comments, including from late night operators, that the proposed policy would be too restrictive and that a blanket ban on opening hours was not an appropriate response. A more flexible approach was preferred to a blanket ban where individual proposals could be considered on their own merit taking into account the amenity of any nearby residents. It was also suggested that the policy needs to be more aligned to the hours allowed in licensing permits given both the planning and licensing regulatory regimes share a common objective in protecting amenity. It was also suggested that more should be done to utilise vacant units in areas such as the High Street and Oxford Street to reinvigorate the night time economy in these locations, rather than focus a late night hub in a less connected, industrial-type area that has few late night venues since the closure of Leisure World. There were some who suggested the policy approach was somewhat dated and did not take account of the success of various independent venues across the city who operate in residential areas with few problems and could do with more support and could form their own mini late night hubs.

Some responses also highlighted a desire to diversify the offering in the night time economy by having more 24 hour supermarkets and other amenities. A point was also made about the need to provide more safe spaces and to increase awareness of these.

Theme	Infrastructure
Policy Name	Community Facilities and Uses
Policy Number	IN7(S)
Options Y/N	N

SUMMARY OF RESPONSES (7 received)

There were mostly mixed responses to this policy. Some felt that it could be overly bureaucratic and controlling and perhaps needed to give greater flexibility to health venues for example. For example where these are no longer fit for purpose exploring whether they could they be used by the community. Others felt that stronger protection is needed for venues so there are no further losses, and a need to specify provision for youths.

Theme	Infrastructure
Policy Name	Indoor and Outdoor Sports Facilities
Policy Number	IN8(S)
Options Y/N	N

SUMMARY OF RESPONSES (20 received)

A substantial number of comments raised concerns that the policy did not adequately reflect challenges at the city's existing sports facilities which were considered to be ageing and no longer meet the needs of modern sport. Several comments suggested that a new indoor sports and leisure strategy is prepared to inform the approach of this policy. There were suggestions that new indoor sports facilities should be located in the City Centre to make them accessible to the widest range of users and that new swimming facilities were particularly needed in the city. There was also a recognition that in some cases it may be more appropriate to invest in a single large sports facility either within the city or in a neighbouring authority that could still serve Southampton as part of its catchment. In devising a new strategy and determining what new facilities should be provided several comments requested greater levels of consultation with the city's sports clubs and teams.

It was highlighted that the public transport accessibility of some sports facilities, such as the Outdoor Sport Centre, needs to be improved. It was considered that the design of Multi-Use Games Areas (MUGAs) needs to ensure that all users feel safe when using them.

Theme	Infrastructure
Policy Name	Primary, Secondary, Further Education & Early Years Provision
Policy Number	IN9(S)
Options Y/N	Y

PRIMARY, SECONDARY, FURTHER EDUCATION AND EARLY YEARS PROVISION POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – School Places Provision		
Option 1a – The Council will ensure that education facilities are delivered across the City through the provision of new schools along with the redevelopment, extension or reconfiguration of such facilities to meet increased demand for school (under 16) and further education (post 16) places - there are no alternative options for the Council in its local education authority role and its statutory responsibility for ensuring that core education and children’s services are delivered within the City. This is because this approach is given significant weight in the NPPF.	7	5
Key Option 2 – the use of Community Use Agreements (CUAs) to provide secured use of playing pitches and/or sports halls for communities		

<p>Option 2a – The Council to require community use agreements are entered into as part of a signed Section 106 agreement to provide secured use of indoor and outdoor facilities for communities following the granting of permission for new schools or for the redevelopment, reconfiguration or extension of school buildings and/or facilities- it is clear from the NPPF that community use agreements which would allow for wider public use of school facilities are not a specific requirement although it is stated in paragraph 124 that planning policies and decisions should support development that makes efficient use of land. This option is therefore the Councils preferred approach due to the finite availability of facilities and resources whereby shared use can help to maximise the use of those existing throughout the city. This would also be in accordance with an approach which is advocated by Sport England when it comes to the shared use of playing pitches</p>	5	0
<p>Option 2b – The Council to not require or seek that community use agreements are entered into as part of a signed Section 106 agreement to provide secured use of indoor and outdoor facilities for communities following the granting of permission for new schools or for the redevelopment, reconfiguration or extension of school buildings and/or facilities – whilst this option do not require or seek community use agreements to be entered into, this does not prevent these from coming forward should these be proposed as part of any submitted planning application. However, Option 2a is the Councils preferred approach.</p>	0	5
<p>Key Option 3 – Future safeguarding of schools and further education establishments</p>		
<p>Option 3a – to propose a flexible approach to redeveloping schools and further education provision if it can be clearly demonstrated there is no longer a need and/or facilities including for community/sports use can be relocated to another accessible site where there are equivalent community benefits – this is the Councils preferred approach since it would allow for strategic planning decisions to be made for the purpose of meeting future school place needs across the city</p>	5	0
<p>Option 3b – to maintain all school and further education provision in its safeguarded use regardless to the future supply and demand trends for school place needs across the city – this approach would prevent flexibility for allowing the Council to redevelop school sites where it is clearly demonstrated they would be surplus to requirements. This would then result in missed opportunities for the sustainable and optimised re-use of land for other uses.</p>	1	4

SUMMARY OF RESPONSES (4 received)

There were no objections to this policy. It was suggested the policy could include more detail

to enable the use of school venues for community activities beyond sport and for school buildings to have more energy and sustainability initiatives.

Theme	Infrastructure
Policy Name	Universities
Policy Number	IN10(S)
Options Y/N	Y

UNIVERSITIES POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – University Campus sites		
Option 1a – to support the provision of new university campus sites in highly accessible locations such as within the city centre – this is the Councils preferred approach due to the accessibility and sustainability benefits this would provide along with the redevelopment and regeneration opportunities this could bring to key city centre sites such as the Mayflower Quarter.	3	1
Option 1b – to support the provision of new university campus sites regardless to where they are proposed in the city – this approach would provide greater flexibility as to where new campus sites could be developed across the city but with a risk of less sustainable and accessible sites being identified.	1	3
Key Option 2 - Academic related uses and alternative uses linked to academic provision		
Option 2a – to support the approach to give wider flexibility to future uses where it can be demonstrated that other uses within the university campuses would not prejudice the future provision and prioritisation of academic related needs – this option provides greater flexibility and is the Councils preferred approach with the provision of non-academic uses due to the benefits this could bring for unlocking the potential for future academic related provision on the university campus sites, so long as these benefits are clearly demonstrated.	3	0
Option 2b – to only support the provision and prioritisation of academic related uses within the university campus sites – this option is less preferable since would be less likely to unlock the full redevelopment potential of the university campus sites.	0	3
Key Option 3 – East Park Terrace campus expansion		

<p>Option 3a – to support the proposed policy approach to maintain flexibility in planning for future uses on the vacant site adjacent to Charlotte Place Roundabout within the Southampton Solent University East Park Terrace Campus – this is the Councils preferred approach since this would help to counteract the current uncertainty in the market for identifying a more specific range of uses at this stage. This approach would also prevent the possibility of the site remaining vacant over a longer-term period if specific uses were identified and were not forthcoming through submitted development proposals</p>	4	0
<p>Option 3b – to identify specific uses which should be developed on the vacant site adjacent to Charlotte Place Roundabout within the Southampton Solent University East Park Terrace Campus – this approach would come with a risk the site remaining vacant if any specific uses were to be unattractive or unviable to the market at any given time over the period of the Plan.</p>	0	3
<p>Key Option 4 – University of Southampton Campus Sites</p>		
<p>Option 4a – to support the proposed flexible policy approach for the intensification of the existing built development within the University of Southampton campus sites with the Highfield Road Campus being the main focal point for redevelopment and investment opportunities – this is the Councils preferred approach since this would help to counteract the current uncertainty in the market for identifying a more specific range of uses at this stage. This approach would also prevent the possibility of the site remaining vacant over a longer-term period if specific uses were identified and were not forthcoming through submitted development proposals</p>	4	0
<p>Option 4b – to identify specific uses which should be developed within the University of Southampton campus sites with the Highfield Road Campus being the main focal point for redevelopment and investment opportunities – this approach would come with a risk the site remaining vacant if any specific uses were to be unattractive or unviable to the market at any given time over the period of the Plan.</p>	0	4

SUMMARY OF RESPONSES (4 received)

With regards to the options all respondents agreed that there should be a flexible approach to development. Whilst some agree with intensification in the City Centre and other most accessible sites, others feel this approach should be taken with all campuses across the city, particularly given that the Highfield is outside of the City Centre.

There was general agreement with themes in the policy and the safeguarding of spaces for academic uses. Support for a flexible approach which fits with the evolving nature of

campuses. Support for intensification at East Park Terrace, but this should be extended to all campuses across the city.

There were objections to the linking of academic floorspace and bedspaces. Changing ways of learning mean this needs to be assessed using appropriate evidence at the time.

There were mixed views on wider community use, with some feeling that students and staff should come first and this should only be for specific projects but others were more open to accommodating community.

There was general agreement in the overall approach recognising the important role the universities play in adding value to the city, its reputation and investment potential. Some feel there could be better integration, through enabling community use of university facilities. Universities are continuing to grow and this need should be met with PBSA. Some aspects felt too prescriptive with lack of evidence. Comments on parking are mixed with recognition that consolidation is needed to make better use of space, but ultimately the Universities feel they should be determining this through their own travel plans.

Theme	Infrastructure
Policy Name	Health & Wellbeing
Policy Number	IN11(S)
Options Y/N	Y

HEALTH & WELLBEING POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Thresholds for defining substantial new development that is required to submit a HIA as part of a planning application		
Option 1a – defining the threshold as 50 dwellings or more for residential development, and at 5,000m ² or more for non-residential development. This will allow the health impacts of developments of this scale and greater to be robustly considered but will capture a greater number of developments requiring more Council resources to assess submitted HIAs	7	0
Option 1b – defining the threshold as 100 dwellings or more for residential development, and at 10,000m ² more for non-residential development. This will ensure the health impacts of the largest development proposals in the city are considered but would miss out those developments that are still of a significant scale and could have impacts on the health and wellbeing of future occupiers and existing neighbours	1	5

SUMMARY OF RESPONSES (12 received)

There was strong support for this policy and its recognition of linkages to other policy areas such as the natural environment. The introduction of Health Impact Assessment (HIAs) was

supported with comments indicating a significant preference for Option 1a, which would introduce a requirement for HIAs to be prepared for residential developments where 50 or more dwellings are proposed and for non-residential developments of 5,000 sqm or more. However, comments were received from various parts of the NHS suggesting that a HIA lower threshold for residential development of 20 or more dwellings should be introduced since this would better capture the health impacts of incremental population growth. Comments from those who would potentially be required to submit HIAs as part of planning applications asked for supplementary guidance to be prepared and consideration be made as to whether an HIA requirement should be focused on those parts of the city with greater health issues.

Comments from the NHS suggested more flexibility is needed in certain parts of the policy. This included having a wider scope of what public facilities health facilities could be co-located with and what related uses will be allowed on hospital sites. There was also a desire for more flexibility on the future uses of existing healthcare sites that were to be replaced with alternative provision elsewhere, particularly when this is part of a comprehensive estate reorganisation. The NHS welcomed the use of developer contributions in providing new facilities to meet the healthcare needs of a growing population.

Some comments raised concerns around the health impacts of other parts of the City Vision, particularly with regard to the density and location of new housing and suggested that new housing should be provided with access to greenspace and pollution mitigation. There was support for using a health and wellbeing approach to support local food growing although it was suggested policy could do more to support urban farming.

Theme	Infrastructure
Policy Name	Electronic Communications
Policy Number	IN12(S)
Options Y/N	N

SUMMARY OF RESPONSES (4 received)

There were mainly mixed responses to this policy. There was an identified need to upgrade the infrastructure and have the flexibility to respond to new technologies. There was a suggestion that all new developments should have fibre-optic pre-installed. Some wondered whether more can more be done to support digitally excluded communities and residents. The physical infrastructure of masts and street cabinets needs consideration, particularly in residential areas.

Theme	Infrastructure
Policy Name	Infrastructure Delivery
Policy Number	IN13
Options Y/N	N

SUMMARY OF RESPONSES (12 received)

There were no objections to this policy, with respondents either in agreement or making mixed responses. Many referred to the S106 agreement process, the need for greater transparency, early engagement with developers, and involving the voluntary and community sector. A range of different infrastructure types were mentioned including rail, water, community and health. One respondent felt that there should be a limit to proportionate contributions on all sites, with perhaps a more strategic approach, others also felt a plan of what is needed where would help.

**SOUTHAMPTON
CITY VISION**

Local Plan



ENVIRONMENT

Theme	Environment
Policy Name	Decentralised and Renewable Energy Infrastructure
Policy Number	EN1(S)
Options Y/N	Y

DECENTRALISED AND RENEWABLE ENERGY INFRASTRUCTURE POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Energy masterplans		
Option 1a – require major development to submit masterplans to establish the most effective energy supply options. These should include the information set out in the policy	22	1
Option 1b – have a more flexible approach without the requirement for energy masterplans for all major development, either with a higher development size threshold or by location within the city. This would reduce the information required to determine the options for energy and therefore may not deliver the most effective options.	1	20
Key Option 2 – Development in Heat Network Priority Areas		
Option 2a – require major development in Heat Network Priority Areas to include a communal low temperature heating system in accordance with the heating hierarchy	23	0
Option 2b – apply the requirement for low-temperature heating systems to a larger development size threshold. Developments within these areas below the threshold size would not be required to include such a heating system, although future occupiers may be faced with higher energy bills and retrofitting costs in future as a result.	0	20

SUMMARY OF RESPONSES (43 received)

The consultation responses were mainly in support of the policy approach by using a bold and clear vision of how to decarbonise and decentralise heat energy supply. It was evident from responses about energy efficiency and renewables that there was an element of confusion between the focus and application of other sustainability policies in the City Vision, and what kind of energy supply this policy was specifically targeting. There were questions on how the energy strategy will interrelate with standards under Building Regulations and how users of communal systems are protected from fuel prices outside Ofgem regulation and the burden of servicing costs. The uncertainty surrounding the timeline to switch the CHP geothermal plant from gas called into question the overall effectiveness of the decarbonisation strategy. Suggestions were made to resist using gas boilers in the future as steppingstone option and only allow green hydrogen energy if there was no other alternative options.

A number of comments and suggestions were received in response to the policy options. Whilst there is a stronger preference expressed for Option 1a, comments were received seeking greater flexibility by major developers in the application of energy masterplans to

ensure viability of development sites in line with Option 1b, and to require submission of energy and sustainability statements to be proportionate to energy demand of smaller scale developments. Others would like to see the energy masterplan policy give greater clarity over which energy supply options are the most effective in saving carbon and whether preference will be given to these options. Greater involvement between developers and VSCE expertise and knowledge was suggested as a way to improve issues around energy supply issues and fuel poverty.

There was a strong preference for Option 2a in acknowledging the impracticalities of retrofitting developments and ensuring consistent design approach to support the future system performance and design & investment into a DH scheme. Others consider that the network mapping should be used to prioritise most deprived communities and those that struggle with social and health inequalities. Suggestions were made how to implement heat network by putting the onus on developers to provide evidence from network operators that there is capacity to serve the new development, and the developer should commit to network connection through a S106 agreement. Caution was aired by large developers with preference of Option 2b suggesting that communal low-temperature heating systems more appropriate on larger developments using the threshold 100 dwelling developments, as this is likely to be more achievable and required viability testing under the City Vision.

Further comments were made on different aspects of the policy. Concerns were raised that decarbonization of heat networks is not guaranteed, so there should be flexibility under part 3a to adjust priority of (i) and (ii) depending on the progress of switching heat networks away from natural gas CHP and boiler farms. Concerns were raised on the lack of meaningful targets set that can be appropriately monitored over the plan period to demonstrate the effectiveness of the City Vision and policy in addressing climate change and to ensure appropriate remedial action can be taken as necessary. It was suggested redevelopments/infrastructure projects (for example, bridge proposals) are required to demonstrate that a provision is included to accommodate utilities networks, including where appropriate, heating and cooling network pipes.

Theme	Environment
Policy Name	Biodiversity
Policy Number	EN2(S)
Options Y/N	Y

BIODIVERSITY POLICY OPTIONS	AGREE	DISAGREE
Option 1a – Require at least 10% biodiversity net gain from all development in the city with the thresholds and details of this applied with regard to the regulations and national guidance when they are published. This meets the minimum proportion set out nationally. While there will be a mandatory requirement for at least 10 percent net gain	13	13

<p>Option 1b – Introduce a higher percentage increase in biodiversity net gain to ensure that high levels of growth are accompanied by more and better quality green spaces and green corridors in the city. This could be a requirement on all development sites across the city or limited to sites meeting the national criteria.</p>	27	3
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SUMMARY OF RESPONSES (69 received)

The consultation responses recognised and were broadly supportive of the approach suggested in the policy recognising a need to conserve and enhance biodiversity in the city. There were however mixed opinions on how this enhancement should be achieved through the application of Biodiversity Net Gain (BNG). Some comments, particularly those from the public and VCSE organisations, showed strong support for Option 1b and requiring a BNG target greater than 10%. There were a few comments suggesting that the target should be a requirement for all developments, including those allowed under permitted development such as conversions to residential dwellings. Other comments, particularly those from developers and those with large landholdings in the city, showed strong support for Option 1a and requiring a BNG target of 10% in line with the requirements of the Environment Act 2021. Concerns around viability were often cited as a reason for not requiring a target above the national 10% minimum. Some comments highlighted that other types of biodiversity enhancement not included in BNG assessment should also be required, such as nesting bricks.

There was interest in having further information in the policy on how BNG will be measured, secured and monitored in the long-term, and what measures will be taken where developments do not deliver the biodiversity improvements that were expected. A few considered that BNG should be delivered through larger scale strategic enhancements rather than onsite enhancements as part of development that will be piecemeal and isolated from wider ecological networks.

The policy's proposed requirements in relation to green roofs also received a mixed response. Some considered the approach did not go far enough and should be applied to developments with pitched roofs that have a slope able to accommodate a green roof. The recognition that green roofs and rooftop photovoltaic panels do not have to be mutually exclusive and can be delivered together on the same roof was welcomed. There were concerns raised about the proposed requirement that all flat roofs should be green roofs. These concerns, particularly from developers, focused on issues of viability and their effectiveness in the long-term due to issues around upkeep and maintenance. It was suggested the proposed requirement for green roofs should be more flexible to better respond to site specific circumstances and that other options could be used to deliver additional greenery and habitat.

As the policy needs to address a number of issues related to biodiversity it was suggested by some that certain issues should be split out into their own separate policies. Examples given included addressing nutrient and recreational impacts on designated sites and protecting the sites identified in the Solent Waders & Brent Goose Strategy. There were also suggestions that greater reference should be made in the policy to relevant national and

regional biodiversity strategies including the Nature Recovery Network, the Local Nature Recovery Strategy and the Solent Recreation Mitigation Strategy.

A few comments specifically raised the issue of pollution in rivers and its impact on wildlife asking for the policy be amended to address this. A few other comments emphasised the need to deliver more greenspace in the city or greening up movement corridors both as a means of creating more wildlife habitat.

Theme	Environment
Policy Name	Green Infrastructure and the Green Grid
Policy Number	EN3(S)
Options Y/N	Y

GREEN INFRASTRUCTURE AND THE GREEN GRID POLICY OPTIONS	AGREE	DISAGREE
Option 1a – protect green spaces identified within the city’s Green Grid. Focus improvements and new green spaces on the Green Grid including opportunities to secure public access and improve links with green spaces outside the city	15	1
Option 1b – follow a more flexible approach to improvements of green space and creating new spaces, not specifically focused on the Green Grid	5	7

SUMMARY OF RESPONSES (44 received)

There was strong support for increasing green infrastructure across the city alongside protecting and enhancing existing green infrastructure. Whilst a majority supported Option 1a which would focus improvements and new green spaces on the Green Grid, some made a case that it would be better to have a combination of both options focusing on the Green Grid but responding to other opportunities for delivering new green infrastructure outside the Grid as they arise. There were concerns raised that it may not be possible to deliver the Green Grid whilst also meeting other development needs but nevertheless brownfield sites should be prioritised for redevelopment.

Some comments wished to see more greenways and greenspaces improved than just those listed in the policy or otherwise wished to understand why those greenspaces listed in policy were being prioritised. There were also various suggestions as to specific greenspaces in the city that should be listed in the policy. There was also a suggestion regarding a space that should be removed from the Green Grid as it is currently the subject of a planning application for new housing. Several comments highlighted the need to consider how the Green Grid would integrate with blue infrastructure and in particular the River Itchen. There was also a desire to see the Southampton Common Plan integrated into the policy or used more clearly as an evidence base document.

It was suggested in some comments from organisations that have a focus on the natural environment that the policy needs to incorporate standards for assessing and monitoring green infrastructure. The need to ensure adequate maintenance for green infrastructure and ensure long-term funding for this, including through developer contributions, was also raised. Interaction between the natural and historic environments should be considered further, including the impact new planting can have on heritage assets, particularly archaeological assets.

In terms of the approach to the Green Grid, it was noted in some comments that the Grid would follow transport corridors. In these corridors it was noted that significant greening would need to occur to be beneficial to wildlife and there were some concerns about how wildlife would interact with major road crossings.

Theme	Environment
Policy Name	Protecting Existing Open Space and Green Infrastructure
Policy Number	EN4(S)
Options Y/N	Y

PROTECTING EXISTING OPEN SPACE AND GREEN INFRASTRUCTURE POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Allowing the loss of open space in exceptional circumstances		
Option 1a – to potentially allow a loss of open space where exceptional circumstances apply and appropriate mitigation, including replacement open space, would be put in place. This would allow a degree of flexibility to allow certain types of development, such as estate regeneration or school extensions, to come forward where developing on existing open space is a necessity. However, even with replacement open space being provided the loss of existing open space would still affect those who use and benefit from it	5	10
Option 1b – to not allow any loss of existing open space. This would protect the city’s open spaces from development but would prevent those developments which would provide significant public benefits that may in exceptional circumstances need to build on part of an area of existing open space.	12	4
Key Option 2 – Approach to development that would result in a loss of open space (if allowing the loss of open space in exceptional circumstances is supported under Key Option 1)		

Option 2a – assessing developments that propose a loss of open space against the criteria for exceptional circumstances set out in Policy EN4. This sets out clear criteria as to what constitutes exceptional circumstances for potentially allowing a loss of open space but cannot cover every eventuality for when a potential development will have benefits that would outweigh the loss of an area of open space.	9	5
Option 2b – assessing development that proposes a loss of open space against a more flexible set of exceptional circumstances than those set out in Policy EN4. This could result in a greater number of benefits being delivered from development that could be allowed on open space but could also result in greater losses of the amount of open space and the negative impacts this could cause	1	14
Option 2c – assessing development that proposes a loss of open space against a less flexible set of exceptional circumstances than those set out in Policy EN4. This would protect existing open spaces to a greater extent by only allowing their loss in the most exceptional of circumstances, but this would be less advantageous in providing the flexibility to deliver other public benefits.	7	6

SUMMARY OF RESPONSES (31 received)

Comments received indicated a strong desire to protect the city's existing open spaces highlighting the benefits these spaces can provide to wellbeing and wildlife. These spaces were identified by nature organisations as being important for alleviating recreational pressure on designated nature conservation sites whilst others reiterated the city's open spaces themselves are under increased pressure due to a growing population and few new open spaces being delivered.

There were however mixed opinions around how this should be achieved whilst also addressing other strategic priorities. Some considered Option 1b to be preferable in order to take a strong position and prevent the loss of open space for development. Others preferred Option 1a taking a pragmatic approach that development needs may on occasion result in a loss of existing open space, but it was emphasised that when this occurs, suitable replacement must be provided. There were also mixed opinions on the form of such replacement open space. Most agreed that such replacement space should be higher quality and provide improved accessibility but some, particularly developers, considered that replacement open space that delivers improvement on previous provision should not have to deliver exactly the same quantity of open space.

There were also mixed opinions regarding Key Option 2 with some expressing preference for using the exceptional circumstances as set out in the policy as drafted as per Option 2a. Although some did suggest that such development should only occur when other options have been exhausted. A common example was that schools should build upwards before extending onto their sports pitches. Others expressed a preference for a more flexible approach as per Option 2b or alternatively widening out the types of development that would be permitted, for example affordable housing provision or essential utility

infrastructure. However, a significant number of comments did not support any choice under Key Option 2 as they did not want to see any development on open spaces or otherwise considered such policy to be a risky gateway to more extensive forms of development on open spaces. Some comments argued that the phrasing of an 'exceptional circumstances' approach was not compliant with the approach to open space dictated in national planning policy.

There was notable support for the retention of settlement gaps to neighbouring towns although there were concerns raised about the long term retention and enforcement of the gaps when large parts of them are under the control of other Local Planning Authorities.

A number of comments suggested that parts of the policy needed tightening up or to be better defined to ensure open spaces are protected and development does not occur by a loophole. Some raised the issue that the evidence base for the policy needs to be expanded or refreshed, such as by incorporating the adopted Common Plan or by updating the Open Spaces Study.

Theme	Environment
Policy Name	New Open Space, Green Infrastructure and Quantity Standards for New Provision
Policy Number	EN5(S)
Options Y/N	Y

NEW OPEN SPACE, GREEN INFRASTRUCTURE AND QUALITY STANDARDS FOR NEW PROVISION POLICY OPTIONS	AGREE	DISAGREE
Option 1a – adopt the open space standards set out in Policy EN5. This will ensure that sufficient open space is provided in new developments but is subject to review to ensure it is viable.	10	4
Option 1b – adopt a higher set of open space standards than that set out in Policy EN5. This will provide more open space for the city but will prevent the land from being used for alternative uses that may help achieve the other aims of this Plan	12	4
Option 1c – adopt a lower set open space standards than that set out in Policy EN5. This will allow for more flexibility in how development sites are used but may not provide enough open space for new residents putting increased recreational pressure on public open spaces	0	15

SUMMARY OF RESPONSES (32 received)

There was strong support for the overall intention of the policy to deliver new and enhanced open spaces in the city. Some comments suggested prioritising the delivery of new open space in areas of greatest need such as the city's more deprived neighbourhoods. Others highlighted a pressing general need for new open space given the city's growing population

and high development targets. It was suggested that some open space should be left to nature rather than be made publicly accessible to better support wildlife on those sites.

With regards to options, there was a mixed response between comments that were content to progress the standards set out in the policy as per Option 1a and those comments who sought a higher set of standards as per Option 1b. No comments sought a lower set of standards as per Option 1c. Some comments from natural environment organisations suggested adopting open space standards put forward by organisations such as Natural England and the Woodland Trust. There were also some comments suggesting that the thresholds for providing onsite open space or play areas should be lower than currently proposed in policy. There were some concerns raised about the draft policy allowing viability to be a consideration in delivering new open space as it was thought to provide developers with a route to not deliver new open space. Responses from developers meanwhile focused on the need to ensure a contribution system was made available as an alternative to onsite provision where this would not be the most appropriate design response to making best use of the site. These comments emphasised that any financial contribution would need to be made to a named improvement scheme. They also requested additional information and supporting evidence around the type and amount of open space that would need to be provided on the development sites specifically named in the policy.

Several comments highlighted the need to incorporate blue infrastructure where possible into new open spaces or to make better use of waterfront areas to provide new active travel routes. There were also suggestions regarding specific locations where more open space should be provided or existing areas that should be designated as open spaces. Some identified areas that are used informally but should be left predominantly wild rather than be enhanced for formal recreational purposes. There were requests that certain elements of the policy or supporting text be more clearly defined in order to make the policy more robust and less open to differing interpretation.

Theme	Environment
Policy Name	Historic Environment
Policy Number	EN6(S)
Options Y/N	Y

HISTORIC ENVIRONMENT POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Improve the evidence base		
Option 1a - consider preparing a heritage topic paper to support the plan, summarising all relevant evidence on the historic environment.	10	2
Option 1b – consider preparing a ‘heritage at risk’ strategy which focuses upon improving the quality of the built heritage asset at risk, or those on the national ‘Heritage at Risk’ register, including the Old Town North Conservation Area itself.	7	2

Key Option 2 – Improve existing guidance or consider additional planning controls		
Option 2a - consider revising/amalgamating the Appraisal & Management Plans for the three Old Town Conservation Areas to create a consistent plan-led approach throughout the city centre	8	2
Option 2b – consider the merit of attaching more planning controls to our conservation areas or non-designated heritage assets, such as Article 4 Directions, to restrict the alteration of, or the complete demolition of, non-statutory protected historic buildings	8	3

SUMMARY OF RESPONSES (24 received)

Comments recognised the need for policy to govern development in relation to the city's many heritage assets and that development should carefully integrate with nearby heritage assets. There was support for preparing further evidence to support the policy as well as for revising and updating heritage related documents such as the Conservation Area Management Plans. However, there were some concerns raised around any attempt to amalgamate the plans for neighbouring Conservation Areas into fewer ones as it was considered these amalgamated plans would be less place specific and more generic subsequently weakening their effectiveness. It was suggested that commitments should be made to implementing the Southampton Common Plan since this included heritage related actions as well as landscape ones.

Some comments raised concerns that not enough has been done previously in policy to protect non-designated heritage assets, particularly those on the Local List, and that more should be done now to protect them. It was also emphasised in some comments that stronger heritage protections are needed for Old Town and that partly for this reason Old Town should not be included as part of any night time economy zone. Instead some suggested that Old Town should become a Heritage Action Zone. Other development proposals in this part of the City Centre, such as around Mayflower Park, were also considered to conflict with the aim of protecting heritage in Old Town. There was also a perceived conflict between this policy's desire to protect the city's historic parks and gardens and other proposed policies which would allow new taller buildings adjacent to the edges of the Central Parks.

Other comments identified difficulties in interpreting the city's heritage assets and that this policy should ensure more is done on interpretation to help connect local communities to their area and support tourism. It was suggested that the VCSE sector could help play a role in increasing awareness of the historic environment to create greater sense of pride in place.

There was a mixed response to the proposed options with a relatively even split between option preferences in the comments. Some comments even suggested pursuing both options under Key Options 1 and 2 since they would deliver different kinds of benefits for heritage.

There were various suggestions made regarding the policy text and how this could be improved, particularly from Historic England. This included suggestions for amended wording so that the policy would be more aligned to the approach set out in national planning policy. There were suggestions in some comments that flexibility should be applied to support other policy aims. This was preferred over a blanket ban approach, with regard to items like installing photovoltaic panels in Conservation Areas as it was considered these could be installed in appropriate, less prominent positions. Some developers suggested that the policy should be more flexible with regards to development within the curtilage of heritage assets, particularly where there is no visual connection between the two or the condition of the asset is poor.

Theme	Environment
Policy Name	Archaeological Heritage Assets
Policy Number	EN7(S)
Options Y/N	Y

ARCHAEOLOGICAL HERITAGE ASSETS POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Supporting evidence		
Option 1a - To prepare a heritage topic paper to support the plan, specifically focusing for archaeological remains. This would enable the plan text to be shortened.	5	3
Option 1b – To not prepare an additional paper and proceed with the policy as it has been drafted	2	5
Key Option 2 – Additional policy / policy detail		
Option 2a - To include a more specific policy/additions to the draft policy for the city’s scheduled monuments. These could cover buffer zones, settings and views, though this detail could be addressed by existing or future supplementary planning documents and guidance such as the Old Town Development Strategy	7	1
Option 2b – To continue with the policy as drafted and leave specific details to be addressed on a case-by-case basis with the support of existing and future supplementary planning documents and guidance.	2	5

SUMMARY OF RESPONSES (8 received)

There was overall support for this policy as there was a recognition of the need to showcase heritage assets from both above and below the ground. Recent work to repair and maintain the Town Walls was highlighted and it was emphasised that this policy should be used to ensure such work continues to be carried out in future.

In the comments there was clear support for Option 1a, which relates to the preparation of a heritage topic paper to support this policy, and for Option 2a, which relates to providing additions to draft policy regarding the city's scheduled monuments.

There were specific amendments to the policy and supporting text suggested by Historic England. This included a need to ensure all scheduled monuments are considered in policy through a consistent approach, not just a singular focus on the Town Walls, better aligning the policy's proposed approach to Desk Based Assessments with that used in national planning policy, and a suggestion that commitments to maintaining the Historic Environment Record would be better made in a strategic heritage policy.

Theme	Environment
Policy Name	Water Resource Management
Policy Number	EN8(S)
Options Y/N	Y

WATER RESOURCE MANAGEMENT POLICY OPTIONS	AGREE	DISAGREE
Option 1a – To achieve a standard of 100 litres per person per day. This is consistent with Southern Water’s ‘Target 100’ aim to be achieved by 2040. This is a tighter standard than that set out in the optional building regulations but reflects the Environment Agency’s classification that Southampton lies within a water stressed area.	15	0
Option 1b – To achieve a standard of 110 litres per person per day. This is consistent with the optional building regulations standard but does not maximise water efficiency in a highly stressed area.	0	12

SUMMARY OF RESPONSES (25 received)

There is a general support for the policy approach to set a target to lower water use below Building Regulations standards, however, a number of respondents considers that the water use target should be lower and compliance with the targets should be less flexible.

There was general support for providing on-site water recycling facilities. Concerns were raised that the assessment of the word feasibility in criterion 2 is not clearly defined so developers could solely use economic reasons to not comply with the requirements. Others considered that more intensive water saving measures should be required such as rainwater harvesting for toilet flushing. In addition, respondents suggested that the policy should focus on behavioral changes and educational initiatives to encourage less water use. Concerns were raised that water leakage resulting from poor quality or poorly installed water efficiency appliances and fittings such as low flush toilets will compromise the water saving measures put in place.

Concerns were raised by Southern Water in relation criterion 3 with regards to limited capacity to connect future homes to existing wastewater networks, so the phasing of housing delivery on major sites will need to be delivered in tandem with Southern Water’s work on each site to reinforce the network prior new homes being occupied. Others highlighted the need for further investment by Southern Water to reduce water leakage through their network, whilst improve water quality and reduce water pollution at their water treatment plants.

There were suggestions that water supply should be sourced through other means such as desalination. Given the pressure from water abstraction on the city’s rivers and their environmental importance, it was suggested to add provisions to this policy or create a designated policy on the protection of chalk streams. The policy should consider impacts to the rivers and increased weight within this policy to give chalk streams a higher level of protection from damage.

Theme	Environment
Policy Name	Flood Risk
Policy Number	EN9(S)
Options Y/N	N

SUMMARY OF RESPONSES (14 received)

There were mainly mixed responses to this policy with a large number wanting greater emphasis on the role of natural flood management measures. A number of detailed suggested amendments have been made on how national policy is applied locally and the need for site assessment and linking with other plans/policies in the region.

Theme	Environment
Policy Name	Sustainable Drainage
Policy Number	EN10(S)
Options Y/N	N

SUMMARY OF RESPONSES (13 received)

The policy approach was generally supported by respondents, however, concerns were raised over the practicality of implementing particular elements of the policy, whilst others have suggested that the approach should not be only limited to large scale development. It was suggested that the policy should apply greater flexibility to enable developers to use SUDS solutions where they are practicable and viable, and in a manner most appropriate on a site-specific basis. Furthermore, a separate requirement in criterion 1(d) to provide a green roof on major sites should be removed, whilst it is ambiguously worded how green roofs should be incorporated across the whole development.

Southern Water supports the policy approach as this aligns with the forthcoming surface water drainage provisions being enacted under Schedule 3 of the Flood and Water Management Act 2010, however, in the interim they suggest strengthening the wording of criterion 1(a) to not support surface water drainage into combined sewers. Natural England suggest consideration should be given to water quality impacts of phosphates discharged from SUDS that are hydrologically linked to designated sites, such as the River Itchen SAC and Southampton Water SPA, in the northern part of the city around Mansbridge and Swaythling.

Other respondents considered that strategic steps should be taken to increase SUDS features as part of city-wide drainage scheme and should link up with the green grid, with reduction of hardstanding in the City Centre to reduce run off and increase green space. In addition, there should be more focus on using nature-based solutions to plant more trees especially around walking and cycling routes, increase soil levels on development sites to improve infiltration, and use bioswales and areas of wet woodland. It was suggested that removal of permeable areas within front gardens to create car parking should be stopped.

Theme	Environment
Policy Name	Air Quality
Policy Number	EN11(S)
Options Y/N	Y

AIR QUALITY POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Applying Standards		
Option 1a – require development to comply with ambitious requirements as set out in policy EN11 to fully address the impact of poor air quality on new development. Including ‘In use’ BREEAM standards. This could have significant public health benefits.	11	0
Option 1b – require development to comply with lower standards to work towards addressing the impact of poor air quality on new development. Not including ‘In use’ BREEAM standards. This provides extra flexibility for development but would not deliver all the potential public health benefits available.	0	11
Key Option 2 – Air Quality Neutrality		
Option 2a – require major developments in Air Quality Management Areas (AQMAs) with any adverse impact on air quality, including those with a negligible or slight impact, to achieve air quality neutrality. This would ensure that the air quality in AQMAs does not worsen due to the impact of development.	11	0

Option 2b – require major developments in AQMAs with a moderate or substantial negative impact on air quality (according to the Institute of Air Quality Management’s Land-Use Planning & Development Control: Planning For Air Quality guidance) only to achieve air quality neutrality. This would ensure that there is no significant change in air quality in AQMAs due to the impact of development	0	11
Key Option 3 – Other Air Quality Measures		
Option 3a – introduce other measures to address poor air quality including standards for construction and demolition and restrictions on stoves and open fires in new residential developments. This will reduce the negative impact of new development on air quality	11	0
Option 3b – not apply further standards to address poor air quality. This would provide greater flexibility for developers but not take all the opportunities to address poor air quality from new development. This will result in relatively poorer air quality in Southampton, representing an elevated risk of non-compliance with air quality standards, and a larger burden on the health and wellbeing of residents of Southampton, worsening health inequalities in the city.	0	11

SUMMARY OF RESPONSES (14 received)

The consultation responses generally supported the proposed policy approach to assess air quality impact. These comments recognised the significant health and environmental impacts of new development associated with poor air quality management. Others considered that the policy should go further to tackle and monitor the wider air quality pollution affecting the city associated with the emissions from the airport, port, and vehicle traffic.

There were limited representations about preferred policy options. Some written comments supported Option 1b to use a bespoke approach to mitigate air quality impacts for new development to offer more flexibility on different projects, and supported Option 3a to secure additional measures to address poor air quality including standards for construction and demolition.

Additionally, various policy text suggestions were received in response to the consultation. It was suggested that there should be a greater reliance on using ‘natural solutions’ to mitigate impacts and improve poor air quality such as with tree planting and green walls. Others suggested setting a threshold to prevent new development in areas which currently exceed the WHO guidance on PM and NO₂ levels. It was suggested there should be a specific requirement to encourage the resources for on-shore power connections for shipping.

Theme	Environment
Policy Name	Noise and Lighting
Policy Number	EN12
Options Y/N	N

SUMMARY OF RESPONSES (8 received)

There were mixed responses to this policy. Some felt it was too prescriptive but then some terms were too vague, therefore further work is needed on these elements. There was concern about noise and light pollution from the port and airport, and how this is considered for new development in close proximity to these sites. Further consideration is needed on the impact of noise and light on wildlife. There is a need for a lighting plan for the City Centre to ensure safety and highlight public spaces and landmarks.

Theme	Environment
Policy Name	Hazardous Substances
Policy Number	EN13
Options Y/N	N

SUMMARY OF RESPONSES (2 received)

There was support for this policy which was considered to provide an appropriate means to maintain MoD safeguarding requirements. There is a need to remove the reference to Netley Anchorage, as this is no longer in use.

Theme	Environment
Policy Name	Contaminated Land
Policy Number	EN14
Options Y/N	N

SUMMARY OF RESPONSES (2 received)

Responses suggested this policy needs to be broader, rather than just focussing on the Britannia Road site. A couple of amendments to the overall approach have been suggested.

Theme	Environment
Policy Name	Land Stability
Policy Number	EN15
Options Y/N	N

SUMMARY OF RESPONSES (2 received)

No comments were made on the policy, just on the overall approach. Consideration needs to be given on a range of development scales, from householder upwards and needs to consider neighbours and railway infrastructure.

**SOUTHAMPTON
CITY VISION**

Local Plan



TRANSPORT AND MOVEMENT

Theme	Transport and Movement
Policy Name	Transport and Movement
Policy Number	TR1(S)
Options Y/N	N

In total 84 comments were received, 40 on the policy text and 44 on the overall approach. No options were proposed within this policy, the focus being to align with the Local Transport Plan and support sustainable growth.

There is no clear level of agreement or disagreement with many comments being mixed. There is support for the principle of prioritising active transport, public transport and reducing car use, particularly in the City Centre. Many comments also link to issues of climate change, zero carbon targets and reducing traffic congestion and air pollution. However, whilst people support the theory many feel that in practice this is more difficult for a number of reasons.

Many said cycling is challenging because cycle paths are not present on all routes, with huge disconnects across the city. Comments were made on safety of cycle routes and for some a feeling that they are dominated by 'speedy commuter cyclists' making it intimidating for other cyclists. With regard for public transport the majority felt it was not adequate to deter car use. Issues raised included a lack of connectivity across the city, affordability, the need to make better use of local trains stations, integrated ticket systems, water buses and taxis, and some supporting the suggestion of a mass transit system.

Whilst there is a great deal of general support for the approach and policy some comments show clear disagreement. Most notable are those highlighting the need for cars, the majority recognising this is an issue for older people of those with accessibility needs. Other comments were stronger in saying everyone has the right to choose their mode of transport, cars are essential and more parking is necessary.

A number of comments included quite specific ideas/suggestions about particular parts of the city, the most notable was concern about closure of some City Centre streets such as Portland Terrace and East Park Terrace. Some felt overall there was too much focus on the City Centre to the detriment of the rest of the city.

**SOUTHAMPTON
CITY VISION**

Local Plan



**DEVELOPMENT
PRINCIPLES**

Theme	Development Principles
Policy Name	Placemaking and Quality of Development
Policy Number	DE1(S)
Options Y/N	Y

PLACEMAKING AND QUALITY OF DESIGN POLICY OPTIONS	AGREE	DISAGREE
Option 1a – There is a presumption in favour of retaining existing trees. Where the loss of trees cannot be avoided, replacement trees will be required to compensate for this loss, alongside additional trees as part of the landscape design. The number of trees required will depend on the size and type of the tree lost and the final Local Plan will set out the number of replacement trees required	14	1
Option 1b – Seek to retain existing trees where possible. Where the loss of trees cannot be avoided, consider appropriate replacements on a case-by-case basis without setting out the number of replacements trees required. This is a more flexible approach but does not provide specific guidance for developers and may lead to the provision of fewer replacement trees.	1	14

SUMMARY OF COMMENTS (43 received)

In general, respondents were supportive of the policy approach, however, comments were received mainly around themes of putting the protection of trees and wider environment at the heart of development and design, securing safe and inclusive public routes including the waterfront for pedestrians and cyclists without discriminating persons with mobility and sensory difficulties, protection of heritage assets from tall buildings and higher density development, promoting high quality and innovative design and use of materials for new development, enhancing open space, and designing out crime with greater consideration for preventing violence against women and girls.

Respondents were generally supportive of Option 1a, whilst a few supported greater flexibility to assess tree loss and replacement on a case by case basis under Option 1b. It was suggested that a tree protection policy should stipulate longer periods for responsibility to maintain replacement trees, species of replacement trees should be carefully chosen to be native, have greater biodiversity benefits, and be direct replacements for those lost. A number of respondents considered the policy should go further to avoid any mature tree loss, and wherever possible introduce trees to achieve a net increase in tree canopy cover. The impact on bird populations was also highlighted from loss of shrubbery corridors cleared to reduce risk of crime and more habitat loss mitigation in new landscaping.

Theme	Development Principles
Policy Name	City Centre Streets and Spaces
Policy Number	DE2(S)
Options Y/N	N

SUMMARY OF COMMENTS (9 received)

There was general support for this policy with people keen to see greater emphasis on cycling and walking and reducing car use, particularly in the City Centre where car free areas can be created. Some felt this policy should also link to waterfront and facilitate the introduction of water buses and taxis.

Theme	Development Principles
Policy Name	Tall Buildings
Policy Number	DE3(S)
Options Y/N	Y

TALL BUILDINGS POLICY OPTIONS	AGREE	DISAGREE
Option 1a – To support tall buildings (5 or more storeys) within a 400m buffer of Southampton’s key transport corridors (see map 8 below) to promote the most efficient use of land and to align with key option 1a of Policy 2 (Density) which seeks to promote increased densities in these highly accessible and sustainable areas	8	5
Option 1b – To not support tall buildings (5 or more storeys) within a 400m buffer of Southampton’s key transport corridors	5	8

SUMMARY OF COMMENTS (34 received)

There were mixed opinions on this policy with some responses supporting a greater use of tall buildings and others raising various concerns. For those who supported tall buildings they considered that densification through the use of tall buildings would help address issues such as housing needs, affordability and reducing car travel. The use of architecture in tall buildings was thought to be a good way to make the city more distinctive. This formed part of a wider recurring comment that high quality design is important for tall buildings and will usually determine the success of a development. Consequently, some considered that greater clarity was needed as to what constitutes good design in a tall building.

Notably, some thought the policy was too conservative and did not go far enough in supporting the provision of more tall buildings. Other suggested it would be better to use a

merit-based approach to allow tall buildings to come forward anywhere in the city where they would be appropriate for their surroundings.

There were however a number of concerns raised about the use of tall buildings with several responses suggesting that recent tall building developments in the city had not been of sufficiently high quality. Some were concerned that more tall buildings would be oppressive and ruin the airy feel of the city that comes from it having fewer tall buildings than other major cities. There were also concerns raised about allowing taller buildings within the 400m buffers of transport corridors. Some felt that tall buildings in these areas would not be in keeping with surrounding low-rise buildings. It was suggested that where transport corridors ran through areas of open space the buffer should be removed. Others suggested that having a buffer was too permissible an approach and instead specific sites should be identified within the buffers that would be appropriate for tall buildings.

Several responses were concerned by the use of tall buildings around the edges of the Central Parks as it was thought tall buildings in these locations would hem in the parks and have a poor visual impact. Whilst those who raised this issue ideally did not want to see any further tall buildings around the edges of the parks, it was suggested that at the very least rows of tall buildings should not be allowed.

Whilst most developers supported tall buildings they did suggest that more detail and timetables were needed regarding potential masterplanning work in the City Centre that would determine where taller buildings would be located. Developers also raised concerns about the approach taken with regards to viewing platforms, suggesting such platforms should be created through a design-led approach and take account of the commercial operation of the building rather than be implemented through a blanket requirement. Certain areas of the city were suggested by developers as being appropriate for tall buildings including Ocean Village and Highfield Campus.

Historic England also raised some concerns and suggested the need for a more balanced approach to the positive and negative aspects of tall buildings and improving linkages with existing evidence documents such as the Tall Buildings Study and Conservation Area Appraisals. They also encouraged policy require the use of visualisations to help in the determination of planning applications for tall buildings. Responses from neighbouring authorities reiterated that tall buildings near the city boundaries would need to take account of neighbouring areas.

Theme	Development Principles
Policy Name	Waterfront
Policy Number	DE4(S)
Options Y/N	N

SUMMARY OF COMMENTS (15 received)

There was general support for the objectives of this policy and the need to have greater and more connected access to the waterfront. Some felt the Council needs to be stronger with developers, securing public access ahead of development and enforcing agreements, whilst others recognise the issues that have arisen in some parts of the city around land ownership and maintenance of paths. There is some support for the relocation of the Red Funnel Ferry terminal, but it was considered this must remain in a central location as it is a vital link to the Isle of Wight. There were overall strong feelings that improvements are needed to Mayflower Park and Town Quay Pier to provide amenity/leisure space. There was support for greening and discouraging car use. There was also a comment regarding the existing paths, noting the policy does not include anything on their maintenance or improvement. This is not something that is covered by a Local Plan but will be shared with relevant colleagues in the Council.

Theme	Development Principles
Policy Name	Accessible and Inclusive Design
Policy Number	DE5
Options Y/N	N

SUMMARY OF COMMENTS (6 received)

There were no objections to this policy, with general agreement that the city should be accessible and welcoming to all people. This may require a range of different solutions to meet different needs of different people.

Theme	Development Principles
Policy Name	Housing Standards
Policy Number	DE6
Options Y/N	Y

HOUSING STANDARDS POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Space standards		
Option 1a. The council is proposing minimum standards for all new homes to ensure that all new development meets minimum size requirements for the number of bedrooms to protect the living conditions of occupiers. This would also provide the opportunity for Registered Providers of affordable housing to acquire new homes as they would meet their existing space standards.	7	1

Option 1b – Space standards are only applied to the smallest properties - Applying internal space standards to studio, one and two-bedroom properties would address the problem of small flats and provides flexibility for developers of properties with three or more bedrooms. A minimum size of 37m2 could apply to house conversions for one-bedroom properties irrespective of whether the property had a double or single bedroom	0	7
Option 1c - Not applying space standards – As permitted development is now required to meet national space standards, the size of properties built has increased. Not requiring development to meet space standards may result in higher numbers of homes and improve their affordability.	1	7
Key Option 2 – Accessibility standards		
Option 2a - The policy requires a proportion of new development to be accessible to people with reduced mobility and wheelchair users either on completion or with only limited adaptations required in the future. The policy proposes applying increased standards to developments of 10 or more and 50 or more homes. The proportion and threshold will be determined after further work is undertaken including a viability assessment.	8	0
Option 2b – Applying alternative thresholds for the introduction of accessibility standards	1	2
Option 2c – Not applying higher accessibility standards due to the challenges in delivering accessible properties in the city and with the large proportion of flats built.	1	6

SUMMARY OF COMMENTS (17 received)

There was general support for improving the quality of homes and doing so by introducing a minimum space standard. Some comments from members of the public sought to encourage delivery of homes above the minimum standard whilst other cautioned against requiring too high a set of standards that might otherwise lead to a reduction in the overall number of new houses being delivered. Developers sought further evidence to justify the introduction of minimum space standards and to understand the impact this would have on viability.

There was also support for introducing accessibility standards with some comments highlighting how this would help people live in their own home for longer as their health and care needs change over time. Several comments considered that all new dwellings should be accessible whilst others considered having a proportion of accessible dwellings to be more pragmatic to ensure the overall delivery of more housing is not impacted. Nevertheless, a majority supported Option 2a of having a proportion of new dwellings to be accessible. Developers highlighted that M4(2) standards for accessible and adaptable dwellings may become mandatory in Building Regulations within the next few years making it superfluous

to include this in the policy. Developers also sought greater clarity and flexibility around the different M4(3) standards for wheelchair and accessible dwelling. The proposed use of viability testing to help determine the proportions of accessible homes was welcomed by developers.

Theme	Development Principles
Policy Name	Energy and Net Zero Carbon Buildings
Policy Number	DE7
Options Y/N	Y

ENERGY AND NET ZERO CARBON BUILDINGS POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Targets for space heating demand and air tightness		
Option 1a – Require new development and conversions to meet targets for space heating demand and air tightness as set out in the policy	9	1
Option 1b – Include a higher target of 60 kw/m2.yr for the space heating demand for listed buildings and other existing buildings which is easier to achieve than the general target	2	5
Option 1c – Include higher targets or an interim level before the full targets apply and leave the delivery of net zero carbon to Building Regulations and Future Homes Standards. This will not fulfil the council’s statutory duty set out in the Climate Change Act and Planning Act and will not enable Southampton to achieve its carbon budget and deliver net zero carbon in line with Paris Agreement 1.5°C trajectory	0	10
Key Option 2 – Decarbonisation of heating		
Option 2a - All heating systems should be provided through low carbon fuels not fossil fuels. Where this is not possible, they should be designed to easily facilitate conversion at a later date	11	0
Option 2b – Not include a requirement for the decarbonisation of heating systems, this would require homeowners to fund and install retrofit measures in order to achieve net zero carbon	0	11
Key Option 3 – Embodied carbon		
Option 3a - Require developments to calculate whole life carbon emissions and demonstrate measures to reduce these emissions	7	3

<p>Option 3b - Include targets to consider embodied carbon (in addition to the general approach in the policy). These could require development to achieve: - 2024- zero carbon regulated (Part L) operations (equivalent of Code 5) - 2030 – zero carbon all operations (equivalent of Code 6) - 2035 – whole life carbon assessment needed and at least 50% reduction against notional standard - 2040 – zero whole life assessment (construction, operational and ongoing extensions and repairs) Some offsetting likely to be needed</p>	5	4
<p>Option 3c – Include targets for embodied carbon. Reduce embodied carbon by 40% or to</p>	6	4

SUMMARY OF COMMENTS (38 received)

In general, the policy approach has been welcomed, however, many respondents have differing views on the level and type of energy standards which should be applied to achieve net zero, including those who consider that energy standards should not be set by the City Vision and the policy should not go beyond or duplicate Building Regulations and Future Homes Standards as this would not allow the market to work in the favour of developers by creating economies of scale. Furthermore, concerns were raised that the standards would risk making development financially unviable or be a constraint in construction techniques where standards are being pushed towards passivhaus, whilst the standards should only be applied ‘where possible’.

Others considered that the policy allows developers too much flexibility which will result in buildings having to be retrofitted, or fitted in the meanwhile with low carbon technologies such as green hydrogen and biomass boilers which have less benefits than technology such as heat pumps to reach net zero. Furthermore, it was questioned why the same standards are not applied to ‘other buildings’ such as office to residential conversions, whilst the renewable energy part of the policy should have a better interface with policy EN1 to take into account the impact on heritage assets. It was suggested that all available facades and pitched roofs on new buildings should be covered to maximise solar renewable energy, whilst solar heating is missing from the policy considerations. It was suggested to improve compatibility between on-plot low carbon energy measures and district heating with sleeving for carbon accounting through Southampton's existing district energy network, and by using low temperature energy systems.

A number of respondents were concerned that the policy wording was vague and open to interpretation to know exactly what the policy requires, especially where the policy uses terms such ‘aspirational’ and ‘maximise’. Others sought more detailed guidance on calculations such as offsetting, and that unregulated emissions should not be considered by the policy given their difficulty to control.

Differences in opinion were raised over the approach to valuing the net zero impact of embodied carbon in re-using existing buildings. Many considered that there should be

presumption to prioritise retrofitting and repurposing existing buildings. Others supported a more pragmatic approach to assess whether there would be greater net zero benefits by replacing an existing building with a more efficient one, whilst organisations such as the University of Southampton were concerned an inflexible approach to demolition would undermine the programme to redevelop their estate. There was uncertainty over how the carbon life cycle assessment would work in practice and be monitored given the limited details set out in the policy. Others pointed out added benefits of tackling fuel poverty by reducing the carbon footprint of buildings.

Theme	Development Principles
Policy Name	Sustainable Design of New Development
Policy Number	DE8
Options Y/N	Y

SUSTAINABLE DESIGN OF NEW DEVELOPMENT POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Sustainability standards		
Option 1a – development is required to meet set BREEAM and BREEAM Communities standards, specific Buildings Regulations (2021) mitigation and Passivhaus certification	6	1
Option 1b – require development to achieve higher standards due to the importance of issues. This could include Passivhaus certification on a higher percentage of housing or at a lower threshold	6	1
Option 1c – remove requirement or set lower standards due to viability issues. This could include not requiring developments to meet BREEAM Communities or Passivhaus Certification	0	7
Key Option 2 – Design led approach		
Option 2a – require all development to take a design led approach to climate change adaptation and follow the cooling hierarchy, proportionate to the size of development	8	0
Option 2b – include a threshold for the size of developments that need to take a design led approach to climate change adaptation and exclude householder developments	0	6

SUMMARY OF COMMENTS (11 received)

There are mixed views whether the policy approach will proportionately address the carbon emissions impact of development.

Respondents from the development industry considered that a more flexible approach should be applied to support design evolution, with the option to use alternative accreditation bodies, and the policy should set lower standards to ensure that the costs of

development remain feasible with no requirements to meet BREEAM or passivhaus certifications. Others raised the issue that some of the standards set out in the policy are mandatory by Building Regulations so should not be included in the City Vision. Additionally, evidence for the passivhaus target set for large scale residential development has not been justified.

In taking an alternative view, most other respondents were concerned that the policy approach would lead to a greater need to retrofit buildings built at a lower standard and, therefore, suggested a more ambitious approach to set higher standards for all developments to achieve passivhaus, and the passivhaus standard should be achieved by a greater proportion of homes within a largescale residential development including affordable homes. Additionally, a standard near passivhaus should be applied to retrofitting existing homes.

Theme	Development Principles
Policy Name	Waste and the Circular Economy
Policy Number	DE9
Options Y/N	Y

WASTE AND THE CURCULAR ECONOMY POLICY OPTIONS	AGREE	DISAGREE
Option 1a – development is required to provide Construction Environmental Management and Circular Economy Statement to demonstrate how issues are addressed and meet requirements for the storage of refuse and recycling materials	7	0
Option 1b – require development to address the storage of refuse and recycling materials without including minimum standards for the number, type and size of facilities to provide greater flexibility and recognise the size limitations of new developments	0	6

SUMMARY OF COMMENTS (3 received)

In general, the policy approach was supported. It was suggested that the policy ‘must’ require developers to first consider whether re-using existing buildings is possible to avoid demolition and rebuild in order to minimise waste generated and reduce carbon emissions.

Theme	Development Principles
Policy Name	Shopfronts, Signage and Advertisements
Policy Number	DE10
Options Y/N	Y

SHOPFRONTS, SIGNAGE AND ADVERTISEMENTS POLICY OPTIONS	AGREE	DISAGREE
Option 1a – utilise the criteria as set out in Policy DE10 to guide and control the design of shopfronts. This will ensure there is a defined approach to how shopfronts should look. However, this may require further guidance to ensure it is suitably implemented by applicants.	3	0
Option 1b – utilise a less prescriptive approach than the criteria set out in Policy DE10. This could allow for more flexibility and innovation in the design of shopfronts to respond to retail trends but could have a detrimental effect on local character and amenity	1	2
Option 1c – utilise a more prescriptive approach and include additional criteria to that set out in Policy DE10. This could ensure there are tight controls to the design of shopfronts that can reinforce high quality design and a traditional appearance. However, this could stifle innovation, be unnecessary in some commercial shopping areas and require additional resource to guide and determine planning applications	0	3

SUMMARY OF COMMENTS (1 received)

There was support indicated for the proposed approach to the design of shopfronts with comments expressing support for Option 1a to utilise the approach as drafted in policy.

Theme	Development Principles
Policy Name	Parking
Policy Number	DE11
Options Y/N	Y

PARKING POLICY OPTIONS	AGREE	DISAGREE
Key Option 1: Where the Parking Standards will be Published		
Option 1a – To continue setting out the parking standards in the Parking Standards SPD – this is the Councils preferred approach as it would allow flexibility for the standards to be updated in a future successor Parking Standards SPD.	6	1

Option 1b – The policy to set out the standards of provision which are expected including where these apply within the city – this option would be less flexible in tying the Council to a set of parking standards over the lifetime of the Local Plan. These would then not be able to be reviewed and updated in a future successor Parking Standards SPD.	0	7
Key Option 2 – Approach to Setting Parking Standards		
Option 2a – to continue with the approach currently set out in the Parking Standards SPD with maximum standards which currently identify high accessibility and standard accessibility areas – this is the Councils current preferred policy approach which helps to maintain a balanced and controlled provision of vehicle parking across the city.	6	1
Option 2b – to consider an alternative approach to parking standards across the city. E.g. minimum parking requirements rather than maximum parking standards – this is an alternative approach the Council could consider with the future provision of vehicle parking	1	5

SUMMARY OF COMMENTS (19 received)

Many of the responses wanted to see a different approach to parking than may have taken place in recent decades. There was general consensus that parking levels in new developments should be reduced, if not made entirely parking free, in areas with good accessibility to services and public transport such as the City Centre and near train stations. Consequently, it was suggested in several responses that any parking standards in the City Vision should be maximum standards and seek to reduce the demand for car travel. There were suggestions that levels of parking in the city should be analysed to see where demand could be reduced and spaces freed up for other uses such as parklets.

Responses from most developers supported the flexibility of including the parking standards in an SPD although some preferred them to be included within the City Vision as they would be easier to look up alongside other standards in a single place such as an appendix.

There was support for including cycle parking standards and for recognising the need to provide parking for different types of cycles. However, it was suggested that cycle parking should also take better account of the physical abilities of the cyclist as well, by providing more accessible spaces for those who struggle with cycle parking racks.

There were suggestions that references in the policy and supporting text to issues around inadequate levels of parking should reflect that this is often a consequence of poor urban design and should be addressed as such to tackle issues such as parking on pavements.

Several responses raised the issue of a lack of park and ride facilities in the city and that this should be addressed within this policy.

Theme	Development Principles
Policy Name	Electric Vehicle Infrastructure
Policy Number	DE12
Options Y/N	Y

ELECTRIC VEHICLE INFRASTRUCTURE POLICY OPTIONS	AGREE	DISAGREE
Option 1a - all developments to meet the standards for the provision of charging infrastructure for electric vehicle appropriate for the specific type of development, subject to viability.	5	2
Option 1b – require a minimum standard of provision from larger developments with the remaining provision viability tested to ensure that larger developments achieve at least a minimum standard of provision	2	3

SUMMARY OF COMMENTS (11 received)

The consultation responses were generally supportive of the policy approach, with the exception that a respondent considered the City Vision should not duplicate Building Regulations Part S which already requires EV charging to be provided by development, and EV should only be encouraged as an interim solution while shifting to car journeys to public transport and active travel. Others considered that the policy approach should be less flexible for developers to take into account development viability. In addition, it was suggested the policy should make provision for the EV charging infrastructure demand for cyclists including e-cargo bikes, kerbside parking, and parking courts outside Council tower blocks. Others felt that parking infrastructure for other kinds of vehicles should be provided such as hydrogen powered vehicles.

Theme	Development Principles
Policy Name	Southampton International Airport
Policy Number	DE13
Options Y/N	N

SUMMARY OF COMMENTS (1 received)

There was feeling that this policy is a little one sided in protecting the airport and should consider impacts of the airport on surrounding proposed development.

SOUTHAMPTON
CITY VISION
Local Plan



SITES

Theme	Sites
Policy Name	Mayflower Quarter
Policy Number	SI1(S)
Options Y/N	Y

MAYFLOWER QUARTER POLICY OPTIONS	AGREE	DISAGREE
Key Option 1 – Level of Infrastructure Transformation		
Option 1a – Necessary Infrastructure – This option would deliver the necessary infrastructure specified above (both strategic and integral to each phase). It would also deliver major development of a similar scale in overall terms to that in option 1b. This would significantly transform the area, creating a more vibrant and connected Quarter, and deliver important strategic infrastructure. It would also require significantly less overall infrastructure investment. However, the wider transformational benefits identified in option 1b below would not be realised. For example, West Quay Road would remain in situ and whilst it could be enhanced as a city street, parts of the Quarter and the waterfront would remain ‘cut off’ by the busy West Quay Road.	4	11
Option 1b – Major transformation – This option would, in addition, by relocating West Quay Road, create a Quarter and waterfront destination which would be significantly better connected in overall terms, have more and higher quality green streets and spaces, and ease the flow of vehicular traffic to the city centre and Port. It would also require significantly more infrastructure investment (from developers and the public sector)	8	9
Option 1b+ - Major transformation with the relocation of West Quay Road to include the use of small areas of Port land – this enables the route of the relocated road to be realigned to enhance the setting of the town walls.	15	2
Key Option 2 – Phasing of Development and Transformational Infrastructure		
Option 2a – No phasing – phases of development could continue in advance of strategic or transformational infrastructure, provided each phase contributed financially towards, and did not prejudice the provision of, that infrastructure. This option provides the maximum flexibility to deliver major development in a highly sustainable city centre location, which in itself will create significant transformational change, whilst still protecting the ability to deliver further transformational change in the future. However, it does risk creating development areas which are cut off from the wider Quarter, are less well protected from flood risk or which generate more traffic congestion, until further infrastructure is delivered.	6	11

<p>Option 2b – Long term phasing – Longer term phases of development would not be supported until the necessary strategic and/or further transformational infrastructure had been delivered. This option may provide the impetus to ensure that strategic / transformational infrastructure is delivered and ensure that areas of new development do not remain ‘cut off’. However, it risks preventing the delivery of further major development in a highly sustainable city centre location. These developments may provide site specific measures to provide more resilience in transport / flood risk terms in advance of strategic / transformational infrastructure being implemented.</p>	12	4
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SUMMARY OF COMMENTS (63 received)

There was general support for redeveloping Mayflower Quarter although various specific concerns were raised. It was recognised the redevelopment would be an ambitious project that would require strong leadership by the Council. Some suggested that a clear vision and implementation plan would be needed and that this should be set out as part of a masterplan or supplementary planning guidance.

There was a mix of opinions on phasing with some highlighting the need for a coordinated approach. Whereas, some developers with land interests in Mayflower Quarter suggested that developments which can come forward sooner should be able to, provided they do not adversely impact on the delivery of the wider Quarter and are in line with its design principles. Other responses pointed out the need to learn lessons from phasing on other major development such as Centenary Quay. There was also a desire to devise an approach that would not see development benefits or the masterplan watered down over time.

There was mixed feeling around the proposed use of tall buildings within Mayflower Quarter with some in support and some concerned this would have a detrimental impact on the waterfront. Others suggested a more nuanced approach to building heights was needed to reflect different character and heritage considerations rather than a blanket minimum or maximum height requirement.

There was a strong feeling that in locating uses across the Quarter, residential development should not be located in proximity to the port. There was also a desire to strengthen policy considerations with regards to how the Quarter would interface with the port noting its operational and security requirements. Those with existing interests in the Primary Shopping Area were concerned that there was insufficient evidence to justify the provision of new retail and leisure uses within Mayflower Quarter without having an adverse impact on existing businesses. A variety of suggestions were made with regards to the kinds of uses that should be delivered within the Quarter including a replacement facility for The Quays, a new conference centre, hotels, museums and green spaces. Several responses made specific requests that Mayflower Park and Town Quay Park should be protected as open spaces. There was also strong support for improving the cultural offering in the Quarter to support

tourism and raise awareness of the area's heritage. In considering strategic links for active travel there were requests to recognise the different needs of pedestrians and cyclists.

Responses from statutory consultees suggested strengthening the policy with regards to heritage and environmental considerations.

Some responses indicated there was confusion around the way commentary around different city centre quarters and Mayflower Quarter was set out. There was also confusion around some specific terms, particularly around the use of the term active frontages. There were requests for further clarity or some condensing of text to address these issues.

Theme	Sites
Policy Name	Itchen Riverside
Policy Number	SI2(S)
Options Y/N	N

SUMMARY OF COMMENTS (11 received)

The majority of comments were mixed or neutral with a couple of suggestions for re-wording policy text. Some respondents sought to maximise waterfront access, aiming for continual access. Protection of maritime employment may need other employment uses to be relocated if waterfront access is not essential, for example aggregates related to port area. There were suggestions for new facilities in the area, maximising benefits of waterfront location. There was some concern about the impact on strategic views.

Theme	Sites
Policy Name	Marlands Shopping Centre and Surrounds
Policy Number	SI3(S)
Options Y/N	N

SUMMARY OF COMMENTS (8 received)

Comments were a mixture of agreement and disagreement, with a couple of suggestions for changes to the policy wording. There were some acknowledgements that improvements are needed but concerns were expressed about over development and too much focus on retail. There was also concern about Linkages to surrounding areas and sensitivity given strategic views.

Theme	Sites
Policy Name	Bargate Sites
Policy Number	SI4(S)
Options Y/N	N

SUMMARY OF COMMENTS (7 received)

There was a feeling that there is too much emphasis on retail and suggestions were made for alternative uses perhaps with a focus on smaller retailers. There was support for pedestrianisation and adding cycling routes to this. There were positive comments about opening up the walls but concerns about the sensitivity of these heritage assets (Bargate and Town Walls).

Theme	Sites
Policy Name	Former Debenhams / East Street Shopping Centre Sites
Policy Number	SI5(S)
Options Y/N	N

SUMMARY OF COMMENTS (9 received)

The majority of comments were mixed or neutral with a few suggestions for changes to the policy wording. There was some support for mixed use redevelopment of the site, but there were concerns that this area is too detached from West Quay and Above Bar Street, to remain part of the Primary Shopping Area. Pedestrian routes should also be cycling routes. Consideration should also be given to the nearby parks and gardens including the habitats within them.

Theme	Sites
Policy Name	Albon Place and Castle Way
Policy Number	SI6(S)
Options Y/N	N

SUMMARY OF COMMENTS (10 received)

The majority of those who commented agreed with the proposed policy with just one suggestion for amendment. There was positive support for pedestrianising the area and creating a bus hub. There was a suggestion to include a footbridge and shelter. Concern was expressed for nearby heritage assets.

Theme	Sites
Policy Name	St Marys and Old Northam Road
Policy Number	SI7(S)
Options Y/N	Y

ST MARYS AND OLD NORTHAM ROAD POLICY OPTIONS	AGREE	DISAGREE
Option 1a - The proposed approach is to require the core shopping area in St Marys Street to deliver full active public frontages which provide the most vibrancy to the street and for full or partial active frontages in old Northam Road to provide greater flexibility there. The policy sets criteria for the redevelopment of sites within the area including appropriate building scale and heights and improvements to streets and spaces and links.	7	1
Option 1b – Remove limitations on old Northam Road to provide a more flexible approach to deliver regeneration in the area	5	3

SUMMARY OF COMMENTS (13 received)

The majority of respondents were supportive of the policy approach with the potential to masterplan the regeneration of Old Northam Rd and sensitively restore the historic shopfronts. It was suggested to offer opportunities to local college students learning trades to take on the works themselves as projects. Others considered that resources should be directed at St Mary Street as the regeneration of Old Northam Road was no longer a viable prospect, and creating more traffic in old Northam Road would conflict with the opportunity to create an enhanced cycle route to the Northam railway bridge. Concerns were expressed that there is a lack of clarity within the design policy to protect sensitive strategic views from the development of tall buildings in St Mary Street.

Theme	Sites
Policy Name	Britannnia Road Gas Works
Policy Number	SI8(S)
Options Y/N	N

SUMMARY OF COMMENTS (9 received)

Most comments were either mixed or in agreement with the proposed policy. There was support for the gas works site to be allocated as a mixed use development and to create better pedestrian and cycle links and improve the look and feel of this part of the city. Some felt that at least part of the structure be retained or sculpture, so the heritage is not lost.

Theme	Sites
Policy Name	Chapel Riverside
Policy Number	SI9(S)
Options Y/N	N

SUMMARY OF COMMENTS (7 received)

Respondents felt there is a need to increase access to waterfront with more access points. There is also a need to define active frontages and suggestions include bars/restaurants to bring more vibrancy to the area. There need to be connections to the City Centre possibly by water bus or taxi.

Theme	Sites
Policy Name	Drivers Wharf
Policy Number	SI10(S)
Options Y/N	Y

DRIVERS WHARF POLICY OPTIONS	AGREE	DISAGREE
Option 1a – To require that the mix of employment uses includes marine uses, unless this would undermine the delivery of the site. This will ensure that the site supports the marine sector and capitalises on its waterfront location, whilst still enabling appropriate flexibility	1	1
Option 1b – To simply require that the employment uses are located to have access to a part of the waterfront wharf, without requiring that the mix of employment uses includes marine uses. This will locate the employment space so that it can potentially support marine uses, without overly restricting uses	1	1

SUMMARY OF COMMENTS (4 received)

Responses were either in general agreement or mixed. Continuous access to the waterfront should be sought. Specific suggestions on amendments to wording were suggested including contributions for flood defences.

Theme	Sites
Policy Name	College Street car park
Policy Number	SI11(S)
Options Y/N	N

SUMMARY OF COMMENTS (6 received)

There was a mixed response to this policy, which some supported but other felt that containers do not fit the surroundings but areas should nevertheless be used for public events. There were concerns raised about sensitive views.

Theme	Sites
Policy Name	Ocean Village
Policy Number	SI12(S)
Options Y/N	N

SUMMARY OF COMMENTS (16 received)

Most respondents made mixed or neutral comments with around a quarter supporting the proposed policy. Concerns were raised about over development of the area and the need to consult with existing residents. Comments were also made regarding specific locations and potential developments.

Theme	Sites
Policy Name	Centenary Quay
Policy Number	SI13(S)
Options Y/N	N

SUMMARY OF COMMENTS (6 received)

There were no objections with responses either mixed or in agreement with the proposals. There is a need to improve access to waterfront as so far such access has not emerged in a way that was originally anticipated. However, some comments highlighted the need to consider the requirements of local business with regards to waterfront access.

SOUTHAMPTON
CITY VISION

Local Plan



**OTHER
COMMENTS**

Theme	Other Comments
Topic	Local Plan General Comments

SUMMARY OF RESPONSES:

As this section provided an opportunity to leave any additional comments there were a wide and varied range of comments received. Due to the range of comments received these have been grouped into themes as summarised below.

Not all of the comments received related to planning policy matters raising issues related to other service areas of the Council outside the remit of the City Vision. Such comments are therefore not able to be considered here but will be passed onto other relevant Council teams to review.

Approach to Plan-Making

- The City Vision is too development focused and needs to take a more holistic look at the issues facing the city.
- Consideration should be given to reviewing and incorporating best practice from other Local Plans.
- It should be clearly set out how progress against the City Vision's goals will be scrutinised over time.
- Data based analysis and return on investment should be used to identify new areas for development.
- A Viability Assessment needs to be prepared for the City Vision particularly looking at strategic site allocations and delivery of essential infrastructure.

Housing

- Proposed housing targets should take account of local constraints and the need to reach net zero.
- New housing and economic growth should not be delivered to the detriment of existing residents.
- Some thought that not enough consideration was given to older people who may want to live in the city centre.
- There were concerns about Houses in Multiple Occupation (HMOs) still coming forward and the impact they can have on surrounding communities.
- Delivering further units of Purpose Built Student Accommodation (PBSA) should reduce the demand for HMOs which should then be encouraged to return to family housing.
- Overconcentrating PBSA in the City Centre will not create diverse communities so some PBSA should be allocated in the east of the city.
- There should be a policy to prevent family housing being split into small standalone apartments as this will not be addressed by the proposed HMO policy.
- Some developers indicated that it was not clear within the City Vision how joint working with neighbours under the Duty to Cooperate has been used to address the city's unmet housing need.

Economy

- There was strong support for delivering a green economy although some raised concerns that the approach to economic development proposed in the City Vision would not achieve this.
- Some questioned the proposed need for additional office space given that many existing offices appeared to be up for rent.
- There was a suggestion to move industrial uses from Itchen Riverside to the west of the city to create an industrial buffer zone between the port and residential areas and free up space on the riverside for redevelopment.

Environment and Climate Change

- There was a strong desire for the City Vision to clearly embed the principles of sustainable design and to address the risks posed by climate change.
- However, some considered the carbon reduction targets in the City Vision need to be more realistic in terms of their timeframes.
- A specific need was identified to address the risks of overheating using solutions that did not require air conditioning.
- There was also a desire to have measurable deliverables on climate and biodiversity policies.
- It was suggested that the retention and refurbishment of existing buildings should be prioritised to reduce embodied carbon emissions.
- Site specific policies need to better address their specific environmental constraints.
- Greater consideration should be given to the city's bluespaces.
- More could be done to support local community owned renewable energy companies.

Design and Placemaking

- There was support for improving waterfront access and ensuring such access is included in new developments.
- It was suggested that the vision of the Culture Strategy needs to be integrated into the City Vision's approach to placemaking.
- There were calls for greater clarity as to what denser and taller development will mean in practice and how such developments will still provide safe and attractive neighbourhoods.
- Increases in density along transport corridors should be flexible enough to protect and enhance the existing character of these areas.
- There needs to be greater provision of different types of play spaces for young people.
- Given land constraints in the city it was suggested that more underground spaces should be created such as basements or underground parking areas.

Communities

- Some considered the City Vision lacks a strategic approach to the needs of Disabled People and does not systematically address the barriers they face.

- There are only minimal references to the role of young people in shaping the future development of the city.
- More could be done to engage local communities to get them involved in plan-making including making the City Vision more accessible and increasing awareness of consultations.

Health and Wellbeing

- Not enough consideration is given to supporting health and wellbeing.

Transport

- It was suggested that greater consideration needs to be given to new sustainable transport opportunities such as park and rides and water-based transport that can be used to connect with other towns in the Solent region.

Theme	Other Comments
Topic	Sustainability Appraisal

SUMMARY OF RESPONSES:

Comments on the Sustainability Appraisal focused on the need to provide additional information to address specific topic areas. This included addressing specific matters on heritage, making references to marine planning matters and giving additional consideration to the value green infrastructure can have on health and wellbeing. It was also suggested that part of the Sustainability Appraisal could be updated to reflect new data available from the 2021 Census to compare against previous data from the 2011 Census.

Theme	Other Comments
Topic	Habitat Regulations Assessment

SUMMARY OF RESPONSES:

Most comments on the HRA focused on the need to provide further evidence to address particular concerns. This included a need to provide further evidence to assess the scale of impact of the City Vision on the qualifying features of designated ecological sites. There were also suggestions that the HRA needs to include further consideration of the marine environment.

Theme	Other Comments
Topic	Other Supporting Documents

SUMMARY OF RESPONSES:

During analysis, some responses were reassigned to other topic areas as they related to a different document with their own dedicated sections. However, the remaining comments received on other

supporting documents focussed on the Strategic Land Availability Assessment (SLAA), Policy Map Changes document and the Draft Mayflower Quarter Masterplan.

For the SLAA, challenge was made to the discounting of site SHO003 at Middle Road in Sholing, stating that the open space designation does not cover the full extent of the site and therefore should not have resulted in the site being discounted. It is requested that this is reviewed. Concerns were also raised with site PEA002 at Bryanston Road in Peartree with issues of increased traffic, parking, impact to flora and fauna, subsidence, the need for road resurfacing, and access for emergency vehicles raised in relation to the potential development of the site.

In terms of the Policy Map Changes document, challenge was made to the methodology for the transport corridors, hubs/train station buffers with a request for evidence which supports the decisions made. This particular response also highlighted some evidence on this matter for consideration in the next stages of plan production.

Finally, support was given for the broad principles of the Draft Mayflower Quarter Masterplan but objection made to development adjacent to the Town Walls, waterfront and Town Quay being a minimum of 6 storeys or exceeding the height of the Town Walls as this would harm the heritage assets. In addition, clarification on the green bridge proposal was requested.