

**Portsmouth City Council's Response to the
Inspectors' questions for
Matter 14
Housing land supply**



Matter 14: Housing land supply

Issue: Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the identification of a sufficient supply of sites across the plan period.

1) Is the Housing Trajectory realistic and based on up-to-date evidence?

14.1.1 Yes, the Housing Trajectory is realistic and based on up-to-date evidence. The Council has proposed modifications so that it reflects the latest monitoring data for the monitoring year 2025/26, including completions and planning permissions up to 31st March 2026. Numerous changes have been made to reflect changing circumstances following the Plan's submission as documented in the Council's answer to Matter 2, Q.2a). Further updates are also noted in the Council's answers to Matter 7, Q.s 1 and 2, and in the sections of Matter 7 on PLP6: Portsmouth City Centre (Q.28), and PLP12: St John's College (Q63 and 64). Information is also provided in the Council's answers to Q.8, Q.14, and Q.15 of the Inspectors' Initial Questions (IQR) [PCC06].

2) Are the assumed lead in times between the submissions of applications and the commencement of development, and the assumed annual build out rates for development, sufficiently robust? In particular, what informed the rates and assumptions referred to at paragraphs 14.4 and 14.5 of the IQR?

14.2.1 Yes, as outlined in the Council's answer to Q.14 of the IQR [PCC06], a range of information sources were used to determine the assumed lead in times between the submission of planning applications and the commencement of development, and the assumed annual build out rates. This included planning history, application of industry-standard assumptions, site visits, discussions with site promoters/landowners, updates from PCC colleagues, the nature of development proposed and average calculations where necessary. It is also worth highlighting that these assumptions stem from when it is anticipated that the site will be available for development within the plan period, as well as the level of developer interest, the details of which are included in the HELAA Report and Appendices 2025 [HOO4]. Timescales for delivery were also covered in Statements of Common Ground between the Council and site promoters/landowners for a number of sites.

14.2.2 Assumptions were determined on a site-by-site basis, taking into account factors such as the site's current land use, size, scale and nature of development envisioned for the site, as well as any site constraints, all of which can have an impact of the anticipated timescales for delivery. For sites that have no planning applications or pre-application enquiries, as noted in paragraph 14.4 of the IQR [PCC06], the following assumptions have been applied: one year has been allowed for the preparation and submission of a planning application; one year for it to be determined (full planning permission); and another year for discharge of pre-commencement conditions. Where outline planning permission has been anticipated, another year has been factored in for reserved matters approval. Any site constraints, such as land remediation and/or demolition works, were also factored into the phasing.

14.2.3 Paragraph 14.5 of the IQR [PCC06] also references the application of industry-standard assumptions for delivery. The annual rate generally used for standard housing is 50 dwellings per annum, however, the majority of development coming forward in Portsmouth is anticipated to be flatted (i.e apartment buildings). Therefore, where applicable, it has been assumed that individual blocks would come forward in one phase; details of numbers per block is taken from detail within planning applications. This assumption has also been applied to sites where a change of use is anticipated. Finally, it is assumed that smaller sites and sites where conversion is taking place rather than new-build will be delivered at a quicker rate compared to large-scale developments. The same assumptions have been made in regard to the planning application process as detailed in the previous paragraph.

14.2.4 The Council considers these assumptions to be robust and that they have appropriately informed the Housing Trajectory for the Plan.

3) **Is there sufficient evidence to demonstrate at least a 5 year supply of deliverable housing land on adoption of the Plan?**

14.3.1 The Council has prepared a new 5 year land supply calculation based on the proposed modified housing requirement set out in the Council's answer to Matter 2, Q.2a). This replaces the calculation provided on page 40 of the Housing Background Paper [TP07]. The calculation is based on figures from the latest Housing Trajectory.

Table 14.1 Five year housing land supply position from the year of anticipated adoption of the Portsmouth Local Plan (spring 2027)

Five-year Housing Land Supply for 2027/28 - 2031/32	How calculated	No. of dwellings
Completions 2025/26 and anticipated completions 2026/27 (covering the two years of the plan period prior to anticipated adoption) (includes strategic sites, allocations, windfall allowance for 2026/27, outstanding permissions, deliverable sites identified in Appendix 2 of the Plan)	316 + 825	1,141
Minus 15% non-implementation rate for 2026/27 (applied to planning permissions outstanding at 31 March 2026, Deliverable sites identified in Appendix 2 for 2026/27)	- 73 (rounded)	(-73) (rounded)
Total supply anticipated 2025/26 - 2026/27	1,141 - 73	1,068
Annualised requirement including 20% buffer (dwellings per annum)	562	562
Total requirement 2025/26 - 2026/27	562 x 2	1,124
Surplus/shortfall against requirement for this period	1,068 - 1,124	-56
Anticipated completions in 2027/28 - 2031/32 (the five year period from adoption) (Includes strategic sites, allocations, windfall allowance, outstanding permissions, deliverable and developable sites identified in Appendix 2 of the Plan - excluding any completions already counted)	574 + 522 + 732 + 963 + 987	3,778
Minus 15% non-implementation rate (applied to planning permissions outstanding at 31 March 2026, Deliverable and Developable sites identified in Appendix 2)	55 + 16 + 10 + 38 + 14	(-133)
Minus shortfall predicted in 2025/26 - 2026/27	-56	(-56)
Total supply anticipated 2027/28 - 2031/32	3,778 - 133 - 56	3,589
Revised housing requirement (per year) (inclusive of 20% buffer)	562 x 3 plus 828 x 2	3,342
Annualised requirement including buffer (dwellings per annum)	3,342 / 5	668 (rounded)
Surplus / shortfall against identified need for this period	3,589 - 3,342	+247
Housing land supply for 2027/28 - 2031/32	3,589 / 668	5.37 years

14.3.2 As can be seen from the above, the Council would have a supply of 5.37 years on adoption of the Plan. This is based on the revised Housing Trajectory, which itself is based on a combination of monitoring data from Hampshire County Council regarding 2025/26 completions and outstanding planning permissions as at 31st March 2026, the 2025 HELAA Report and Appendices [HO04] and updates based on changing circumstances, including that covered by the LPS Tower Blocks Topic Paper [PCC16].

- 4) **Is there reasonable confidence that a 5 year supply would be maintained throughout the plan period? If not, how could this be achieved?**
- 14.4.1 Yes, there is reasonable confidence that a 5 year supply would be maintained throughout the plan period. For example, a calculation for land supply for the 2028/29 - 2032/33 period (1 year later than the calculation provided in the Council's answer to Q.3) results in a supply of 5.41 years. Whilst the delivery rates drop towards the end of the plan period, as past over-delivery will be counted in calculations, this will offset this so that a five year supply is maintained.
- 5) **Will there be a sufficient supply of deliverable and developable housing land to ensure that the housing requirement would be met?**
- 14.5.1 Yes, the new Housing Trajectory shows that there will be a sufficient supply of deliverable and developable housing land to ensure that the modified housing requirement can be met.
- 6) **What flexibility and contingencies does the Plan provide if one of more of the sites allocated or identified in the Plan does not come forward to the Council's estimated timescales?**
- 14.6.1 The Council has proposed a housing requirement based on a capacity approach, whereby all the sites that can be delivered in Portsmouth have been included in the Plan. However, some flexibility is built in via the non-implementation rate, which deducts 15% from anticipated supply from outstanding planning permissions at 31 March 2026, as well as 15% from the anticipated supply from deliverable and developable sites identified in Appendix 2 of the Plan. Whilst there is no such contingency applied specifically to allocated sites, the "cushion" created by the non-implementation rate could equally contribute towards addressing non-delivery of an allocated site.