

**Portsmouth City Council's Response to the
Inspectors' questions for
Matter 2
Housing need and requirement**



Matter 2: Housing need and requirement

Issue: Whether the approach to calculating local housing need and the Plan's housing requirement is positively prepared, justified, effective and consistent with national policy.

This issue includes detailed consideration of Policy PLP16.

- 1) **Has the calculation of local housing need (15,285 dwellings across the plan period) been undertaken appropriately using the standard method, the correct inputs and up-to-date evidence?**
 - 2.1.1 Yes, this is set out in paragraphs 3.7 to 3.16 of the Housing and Economic Development Needs Assessment (HEDNA) Update dated October 2025 [HO02]. The City's housing need, using the standard method, was 1,019 dwellings per annum in May 2025. This was based on the latest available evidence at that time. Over the fifteen year plan period (2025-2040) this equates to 15,285 dwellings.
 - 2.1.2 The May 2025 standard method figure was the most up to date figure for Portsmouth when the Pre-Submission Portsmouth Local Plan Addendum 2025 [KD02] was published for consultation in November 2025. The standard method was subsequently updated in May 2026 to 1,022 dpa or 15,338 over the plan period. The Council does not consider the difference of 53 dwellings over the plan period to be significant, and it would not affect any conclusions of the HEDNA report. If however the Inspectors would like modifications to be proposed to the Plan to reflect the latest standard method figure, the Council would be willing to draft those.
- 2) **Is the housing requirement of 11,369 dwellings, as set out in Policy PLP16, soundly based? In particular:**
 - a. **Are changes to the housing requirement (and therefore tables 3.1 and 6.1, and the Housing Trajectory in Appendix 3 of the Plan) required due to changing circumstances following the Plan's submission, including changes associated with sites 'allocated' (by policies PLP3 to PLP15) and 'identified' (in Appendix 2) in the Plan?**
 - 2.2.1 Yes, changes to the housing requirement and Tables 3.1 and 6.1 of the Housing Trajectory in Appendix 3 of the Plan are required due to changing circumstances following the Plan's submission. These include planning applications having been submitted, the Council granting / resolving to grant planning permissions, amendments having been made to planning applications, sites being no longer available for development, and two new Council-owned sites being added. Additionally, the new monitoring figures for the 2025/26 monitoring year have also been factored into the proposed modifications, as these were finalised during the preparation of the Council's answers to MIQs. Modifications have been included in the Supplementary Modifications Schedule [PCC15], including a new Housing Trajectory but, for ease of reference, the key changes are as set out below. A clean version of the Housing Trajectory is appended to this matter statement at Appendix 1.
 - 2.2.2 The housing requirement is proposed to be changed from 11,369 to 11,090 over the period 2025-2040. The requirement is now proposed as 562 per annum for years 0-5 of the Plan (up from 588 previously), stepping up to 828 per annum for years 6-15 (down from 843 previously). This means the shortfall against the standard method becomes 4,195 dwellings (this was previously 3,916), reducing to 3,247 dwellings once the contributions from Fareham and Winchester have been taken into account.

Table 6.1 is proposed to be revised as set out below (changes not shown as tracked here to make the table easier to read, but these are shown clearly in the Supplementary Modifications Schedule):

Source		No. of dwellings (net)
Net completions since 1 April 2026 (excluding allocations)		241
Strategic Sites	Tipner West	1,000
	Tipner East	1,056
	Portsmouth City Centre	3,355
	Fratton Park & the Pompey Centre	460
	St James' and Langstone Campus	405 (417 gross)
Allocations	Port Solent	500
	St John's College	149
	Fraser Range	134
	The News Centre, Hilsea	100
	Somers Orchard, Somerstown	566
Deliverable Sites (excluding Strategic Sites and Allocations)	Planning permissions outstanding at 31 March 2026	850
	- Less 15% non-implementation	(-128)
	Deliverable sites identified in Appendix 2	177
	- Less 15% non-implementation	(-27)
Developable sites (excluding Strategic Sites and Allocations)	Developable sites identified in Appendix 2	1,347
	- Less 15% non-implementation	(-202)
Windfall allowance	Windfall allowance	1,106
Requirement for new homes in Portsmouth 2025-2040 excluding Duty to Cooperate contribution		11,090 (739 dwellings per annum)
Duty to Cooperate contribution from neighbouring authorities		948
Requirement for new homes in Portsmouth 2025-2040 including Duty to Cooperate contribution		12,038 (803 dwellings per annum)

2.2.3 In terms of allocations, the housing figure has changed for Portsmouth City Centre and St John's College. Further information on these can be found in the Council's answers to Matter 7 against the questions on these sites. The completions from 2025/26 have also now been included, along with permissions from 2025/26. The figure for the windfall allowance has been reduced by 79 dwellings to reflect the fact that finalised completion figures have now been included for 2025/26, so it would not be correct to include 79 additional dwellings in addition to the actual completion figures for that year.

2.2.4 Additionally, a significant post submission update relates to the Cabinet's decision made on 5 August 2026 to redevelop four tower blocks of social housing owned by the Council, which have been deemed to have come to the end of their lives. This redevelopment had not previously been anticipated, so these sites were not included in the HELAA. The redevelopment will involve decanting residents from the tower blocks and rehousing them permanently elsewhere, demolishing the existing buildings, and replacing them with new tower blocks. The four tower blocks are located on two sites: Barkis House and Nickleby House on one site, and Tipton House and Edgbaston House on another. Demolition of the four tower blocks will result in a loss of 544 dwellings, but the redevelopment of the sites is estimated to deliver 956 new dwellings, a net gain of 412, though as some of these will be completed after the end of the plan period, a gain of only 142 dwellings is predicted within the plan period. The Council has prepared a separate topic paper on this issue [PCC16]. To address this change, the Council proposes to add the site of Barkis House and Nickleby House to the strategic site allocation of PLP6: Portsmouth City Centre, as this is located adjacent to the current site boundary. The site of Tipton House and Edgbaston House is proposed to be added to Appendix 2 of the Plan as an identified developable site. The figure for PLP6: Portsmouth City Centre is therefore proposed to be updated

accordingly, and the site of Tipton House and Edgbaston House is proposed to be added to Appendix 2 of the Plan.

b. Is setting the housing requirement below the local housing need figure justified?

- 2.2.5 Yes, the justification for this is set out in the Housing Background Paper [TP07]. Section 3 of the Housing Background Paper sets out the sources of new homes in Portsmouth, concluding in paragraph 3.14.1 that the number of new homes which could be provided based on all sources (net completions, site allocations, deliverable and developable sites, and windfalls) is 11,369 over the plan period. This compares to the local housing need figure of 15,285. Section 7 of the Housing Background Paper explains the approach being taken, bringing together all the evidence referenced earlier in the Housing Background Paper. Taking into account updates to the housing requirement and housing trajectory due to changing circumstances after submission, as well as the latest monitoring figures for 2025/26 the updated figure for new homes in Portsmouth from all sources is 11,090.
- 2.2.6 Paragraphs 3.6.1-3.6.6 of the Housing Background Paper are key in justifying the housing requirement, as they make clear that there are simply no more sites available for the Council to allocate to increase the housing requirement figure. This involves cross-referencing evidence from the Housing and Economic Land Availability (HELAA) Report and Appendices 2025 [HO04] and HELAA Methodology 2025 [HO03].

c. Are the 15 percent non-implementation rates specified in Table 6.1 justified?

- 2.2.7 Yes, the justification is set out in the Housing Background Paper [TP07] paragraphs 3.12.1-3.12.5.

d. Is the windfall allowance specified in Table 6.1 justified?

- 2.2.8 Yes, the justification is set out in the Housing Background Paper [TP07] paragraphs 3.13.1-3.13.6.

e. Is the proposed stepped housing requirement justified?

- 2.2.9 Yes, the justification is set out in the Housing Background Paper [TP07] paragraphs 6.3.1-6.3.4. As set out above, due to changing circumstances after submission of the Plan, the housing requirement is proposed to be updated to 11,090, with the stepped housing requirement being amended to 562 dwellings per annum for years 0-5 of the Plan, stepping up to 828 dwellings per annum for years 6-15.

3) Does the Plan identify land to accommodate at least 10 percent of the housing requirement on sites no larger than one hectare in accordance with paragraph 73(a) of the Framework?

- 2.3.1 Yes, this is set out in the Housing Background Paper [TP07] paragraph 3.15.1. This indicates that a total of 1,443 dwellings have been identified on sites less than one hectare in size, which is 12.7% (rounded) of the housing requirement of 11,369. Based on updates made after submission of the Plan, this alters the total number of dwellings on sites less than one hectare in size to 1,274, which is 11.5% (rounded) of the amended housing requirement of 11,090. This is based solely on sites identified in the revised Appendix 2 of the Plan (which shows the area for each site), so does not include any sites with planning permission at 31st March 2026.

4) Should the Plan set housing requirements for designated neighbourhood areas, in light of paragraph 69 of the Framework?

- 2.4.1 There is only one made neighbourhood plan in Portsmouth, which is the Milton Neighbourhood Plan [EDP06]; there are no other areas designated for the purposes of neighbourhood planning. The Milton Neighbourhood Plan did not seek to allocate any sites for development and so it was

not necessary for the Local Plan to set a housing requirement for the neighbourhood area. If other neighbourhood plans were to come forward in the future the setting of housing requirements would be considered through the preparation of the Future Portsmouth Plan. The notice of intention to commence local plan preparation is set out in the Full Council report of 14 July 2026 [PCC05].

5) **What are the anticipated implications for the Plan and the underpinning evidence if the housing requirement were to be uplifted to meet the local housing need figure?**

2.5.1 There are no additional sites which can be allocated that would enable Portsmouth to meet the higher local housing need figure. Therefore, if the housing requirement were to be increased to match / exceed the local housing need figure, it would not be possible for the Council to provide a five year housing land supply on adoption or indeed later in the plan period. The Council can run a new call for sites, which it intends to do later this year as part of the preparation for the new style Future Portsmouth Plan (this will run at the same time as the Scoping Consultation), but it is not anticipated that large numbers of new sites of any significant scale will come forward (due to the built up and compact nature of the City, it is rare that new sites of a large scale come forward without the Council being aware of them). Increasing the housing requirement will not result in the delivery of more housing in Portsmouth as there are simply no more sites to accommodate the growth.

6) **Is Policy PLP16 otherwise positively prepared, justified, effective and consistent with national policy?**

2.6.1 Yes, Policy PLP16 is otherwise positively prepared, justified, effective and consistent with national policy as detailed in the Housing Background Paper [TP07] and Allocations Topic Paper [TP08] and supported by evidence in the HEDNA Update [HO02], HELAA Report and Appendices 2025 [HO04] and HELAA Methodology 2025 [HO03].

Appendix 1 Proposed Modified Housing Trajectory (clean)

Housing Trajectory¹

Site Name	No. Dwellings (Net)	Year of the Local Plan														
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
		2025 /26	2026/ 27	2027/ 28	2028/ 29	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	2035/ 36	2036/ 37	2037/ 38	2038/ 39	2039/ 40
Net completions since 01 April 2025 (excludes completions against individual sites)																
Total	241	241	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic Sites																
NE19 Tipner West	1000	0	0	0	0	0	0	0	100	150	150	100	100	100	100	200
NE18 Tipner East																
Vivid Homes (22/01292/FUL)	835	0	0	0	100	110	0	104	104	104	0	104	104	105	0	0
Bellway (21/01357/FUL)	221	0	0	0	0	0	73	74	74	0	0	0	0	0	0	0
Tipner East total	1,056	0	0	0	100	110	73	178	178	104	0	104	104	105	0	0
Portsmouth City Centre																
CD17 City Centre North	1600	0	0	0	0	184	183	183	175	175	175	0	0	175	175	175
CD18 Debenhams	554	0	0	0	188	222	144	0	0	0	0	0	0	0	0	0
CD22 30 Arundel Street	5	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0
CD25 Portsmouth Mail Centre	102	0	0	51	51	0	0	0	0	0	0	0	0	0	0	0
CD26 Land adj Catherine's House	147	0	0	0	0	0	0	75	72	0	0	0	0	0	0	0
CD28 2-10 Edinburgh Road	20	0	0	0	0	0	0	0	20	0	0	0	0	0	0	0

¹ Pink shading highlights the anticipated five year housing land supply from the date of adoption

CD30 41-47 Arundel St	40	0	0	0	0	0	0	40	0	0	0	0	0	0	0	0
CD31 194-198 Commercial Rd	80	0	0	0	0	0	0	80	0	0	0	0	0	0	0	0
CD34 Tesco/NCP	160	0	0	0	0	0	0	0	0	80	80	0	0	0	0	0
CD36 12-28 Arundel Street	249	0	0	0	0	0	0	0	0	125	124	0	0	0	0	0
CD37 Arundel St, Shopmobility	76	0	0	0	0	0	0	0	76	0	0	0	0	0	0	0
CD50 Greggs-Nationwide	70	0	0	0	0	0	0	0	0	70	0	0	0	0	0	0
CD94 Barkis & Nickleby	252	0	0	0	0	0	0	0	0	0	0	52	100	100	0	0
Portsmouth City Centre total	3,355	0	0	56	239	406	327	378	343	450	379	52	100	275	175	175
MI02 Fratton Park & the Pompey Centre	460	0	0	0	0	0	0	0	154	153	153	0	0	0	0	0
MI01 St James' and Langstone Campus																
St James' (HE site 24/01117/FUL)	58	0	29	29	0	0	0	0	0	0	0	0	0	0	0	0
St James' (HE site, not yet permitted)	30	0	0	0	0	30	0	0	0	0	0	0	0	0	0	0
St James' (PJ Livesey site)	197	44	153	0	0	0	0	0	0	0	0	0	0	0	0	0
Langstone Campus	120	0	0	0	0	0	0	120	0	0	0	0	0	0	0	0
St James' and Langstone Campus total	405	44	182	29	0	30	0	120	0	0	0	0	0	0	0	0
Strategic Sites total	6,276	44	182	85	339	546	400	676	775	857	682	256	304	480	275	375
Site Allocations																

PA01 Port Solent	500	0	0	0	0	0	0	0	0	125	125	125	125	0	0	0
SJ15 St John's College	149	31	76	42	0	0	0	0	0	0	0	0	0	0	0	0
EC01 Fraser Range	134	0	0	0	0	40	94	0	0	0	0	0	0	0	0	0
HI06 The News Centre	100	0	0	0	0	0	0	0	0	100	0	0	0	0	0	0
ST11 Somers Orchard, Somerstown	566	0	0	0	0	0	136	137	123	124	46	0	0	0	0	0
Site Allocations total	1449	31	76	42	0	40	230	137	123	349	171	125	125	0	0	0
Deliverable Sites (excluding Strategic Sites and Allocations) - planning permissions outstanding at 31 March 2026																
Sites of 10 or more units																
Royal Beach Hotel (East Wing) 1 St Helens Parade (22/01032/FUL)	29	0	29	0	0	0	0	0	0	0	0	0	0	0	0	0
Hippodrome House, 5-9 Guildhall Walk (20/00019/PACOU)	45	0	45	0	0	0	0	0	0	0	0	0	0	0	0	0
Portland Hotel, 38 Kent Road (16/01584/FUL)	12	0	12	0	0	0	0	0	0	0	0	0	0	0	0	0
Former Ambulance Station Land Adjacent To The Harbour Car Park Ship Leopard Street Portsmouth (17/00473/OUT)	11	0	0	11	0	0	0	0	0	0	0	0	0	0	0	0

44-66 Palmerston Road (Former Debenhams) (20/00620/FUL)	134	0	98	36	0	0	0	0	0	0	0	0	0	0	0	0
Edinburgh House, Land at former Sundridge Close (21/01710/CS3)	50	0	0	50	0	0	0	0	0	0	0	0	0	0	0	0
Former Frank Sorrell Centre, Prince Albert Road (21/01833/PA)	18	0	0	18	0	0	0	0	0	0	0	0	0	0	0	0
Empire House, 5 Kings Road (24/00002/PACOU)	11	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0
38 London Road (23/00415/FUL)	10	0	10	0	0	0	0	0	0	0	0	0	0	0	0	0
69-73 High Street (25/00799/FUL)	12	0	0	12	0	0	0	0	0	0	0	0	0	0	0	0
62 Middle Street (25/00590/FUL)	11	0	0	11	0	0	0	0	0	0	0	0	0	0	0	0
Sites of 10 or more units total	343	0	205	138	0	0	0	0	0	0	0	0	0	0	0	0
All other sites less than 10 units																
All other sites less than 10 units	507	0	283	215	9	0	0	0	0	0	0	0	0	0	0	0
Deliverable sites - outstanding planning permissions - total	850	0	488	353	9	0	0	0	0	0	0	0	0	0	0	0
Deliverable Sites (excluding Strategic Sites and Allocations) - Deliverable Sites identified in Appendix 2																
COP01 Brynwell Builder's Yard	25	0	0	0	0	25	0	0	0	0	0	0	0	0	0	0
COS01 Cosham Health Centre	70	0	0	0	70	0	0	0	0	0	0	0	0	0	0	0

CS06 227-231 Goldsmith Avenue	25	0	0	0	25	0	0	0	0	0	0	0	0	0	0	0
EC14 Eastney Swimming Pool	6	0	0	6	0	0	0	0	0	0	0	0	0	0	0	0
MI07 185-192 Highland Road	9	0	0	9	0	0	0	0	0	0	0	0	0	0	0	0
ST03 Open space at Stone Street	18	0	0	0	0	18	0	0	0	0	0	0	0	0	0	0
HI02 Land of former supermarket	24	0	0	0	0	24	0	0	0	0	0	0	0	0	0	0
Deliverable sites - Appendix 2 - total	177	0	0	15	95	67	0	0	0	0	0	0	0	0	0	0
Developable Sites (excluding Strategic Sites and Allocations) - Developable Sites identified in Appendix 2																
BA01 Coniston Avenue	11	0	0	0	0	0	0	0	0	0	11	0	0	0	0	0
BA02 West of Milton Road	8	0	0	0	0	0	0	0	0	0	0	0	0	8	0	0
CD04 The Invincible	40	0	0	0	0	0	40	0	0	0	0	0	0	0	0	0
CD07 Bridge Centre	115	0	0	0	0	0	0	0	0	50	65	0	0	0	0	0
CD10 Maxstoke Close Car Park	5	0	0	0	0	0	0	0	0	0	5	0	0	0	0	0
CD15 Hertford Place	17	0	0	0	0	0	0	0	0	0	17	0	0	0	0	0
CD35 Groundlings Theatre	20	0	0	0	0	0	0	0	20	0	0	0	0	0	0	0
CD65 117-127 Fratton Road	30	0	0	0	0	0	0	0	30	0	0	0	0	0	0	0
CD75 Venture Tower	41	0	0	0	0	0	41	0	0	0	0	0	0	0	0	0
COS03 Westmoors	10	0	0	0	0	0	0	0	10	0	0	0	0	0	0	0
COS04 Former Cosham Police Station	60	0	0	0	0	0	0	0	0	0	60	0	0	0	0	0
COS05 Clockhouse Centre	18	0	0	0	0	0	18	0	0	0	0	0	0	0	0	0

DF02 Karen Avenue	6	0	0	0	0	0	6	0	0	0	0	0	0	0	0	0
ECO2B Land at Halliday Crescent	5	0	0	0	0	0	0	0	0	0	5	0	0	0	0	0
EC11 Southsea Marina	12	0	0	0	0	0	0	0	12	0	0	0	0	0	0	0
HI01 Hilsea Lodge	34	0	0	0	0	0	34	0	0	0	0	0	0	0	0	0
HI04 Land at Pompey Health and Fitness	10	0	0	0	0	0	0	0	10	0	0	0	0	0	0	0
HI13 TA Centre, Peronne Road	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	28
MI05 Goldsmith Avenue	20	0	0	0	0	0	0	0	0	0	0	0	0	20	0	0
NE01 Connect Centre	191	0	0	0	0	0	96	95	0	0	0	0	0	0	0	0
NE03 Former Police Station	60	0	0	0	0	0	0	0	0	0	60	0	0	0	0	0
NE05 205 London Road	5	0	0	0	0	0	5	0	0	0	0	0	0	0	0	0
NE06 Blue Anchor PH	6	0	0	0	0	0	0	0	0	0	6	0	0	0	0	0
NE09 98 London Road	30	0	0	0	0	0	0	0	30	0	0	0	0	0	0	0
NE22 Land at Heathfield Road	18	0	0	0	0	0	0	0	18	0	0	0	0	0	0	0
PA16 Amenity Land off Newbolt Rd & Bodmin Rd	8	0	0	0	0	0	0	0	0	0	8	0	0	0	0	0
SJ04 61-63 Marmion Road	5	0	0	0	0	0	0	0	5	0	0	0	0	0	0	0
SJ12 82-88 Clarendon Road	20	0	0	0	0	0	0	0	20	0	0	0	0	0	0	0
SJ16 Wimbledon Park Sports Centre	30	0	0	0	0	0	0	0	0	0	30	0	0	0	0	0
SJ17 Queen's Hotel and Casino	104	0	0	0	0	0	0	0	52	52	0	0	0	0	0	0

ST01 City Records Office	45	0	0	0	0	0	0	0	0	0	45	0	0	0	0	0
ST02 32-60 Middle Street	163	0	0	0	0	0	0	0	0	82	81	0	0	0	0	0
ST04 Wightlink Car Park	60	0	0	0	0	0	0	0	0	0	0	0	0	0	0	60
ST07 Derelict Land	14	0	0	0	0	0	14	0	0	0	0	0	0	0	0	0
ST12 Cathedral House	8	0	0	0	0	0	0	0	0	0	8	0	0	0	0	0
ST17 Clarence Pier	200	0	0	0	0	0	0	0	0	0	100	100	0	0	0	0
ST29 Tipton & Edgbaston	-110	0	0	0	0	0	0	0	0	0	0	0	-272	0	0	162
Developable sites - Appendix 2 - total	1347	0	0	0	0	0	254	95	207	184	501	100	-272	28	0	250
Windfall Allowance																
Total	1,106	0	79	79	79	79	79	79	79	79	79	79	79	79	79	79
TOTAL HOUSING SUPPLY																
Total	11,446	316	825	574	522	732	963	987	1,184	1,469	1,433	560	236	587	354	704
minus 15% non-implementation rate total (applied to planning permissions outstanding at 31 March 2025, Deliverable sites identified in Appendix 2, and Developable sites identified in Appendix 2)	356	0	73	55	16	10	38	14	31	28	75	15	-41	4	0	38
Requirement for new homes in Portsmouth 2025-2040 excluding Duty	11,090	316	752	519	506	722	925	973	1,153	1,441	1,358	545	277	583	354	667

to Cooperate contribution																
Duty to Cooperate contribution from neighbouring authorities	948	64	64	64	63	63	63	63	63	63	63	63	63	63	63	63
Requirement for new homes in Portsmouth 2025- 2040 including Duty to Cooperate contribution	12,038	380	816	583	569	785	988	1,035	1,216	1,504	1,421	608	340	646	417	730