

Matter 2 Housing: Need and Requirement – Policy PLP16
59626 & 61354

2d) The housing requirement of 11,369 dwellings, as set out in Policy PLP16 is **not** soundly based in particular to the windfall allowance specified in Table 6.1, **and is therefore not justified.**

6) Policy PLP16 is **not** positively prepared, justified or effective.

Statement:

Table 1.6 shows that the windfall allowance will be 1,185 over the total Plan period, which equates to 79 dwellings per annum. There are numerous issues with this proposition.

Windfall sites are defined in the National Planning Policy Framework as sites not specifically identified in the development plan. The windfall category covers several different types of housing and not just houses in multiple occupations (HMOs). However, in an extremely densely populated area such as Portsmouth, where HMOs take from the existing family housing stock, and increase further intensification, they should be considered in a category of their own.

No definitive number, or percentage, is allocated to the contribution that HMOs will make to the 1,185 windfall sites over the course of the entirety of the Plan. It is stated that ratios are applied to produce an equivalent figure to standard C3 housing. We could not locate within the Plan any further reference to the ratio, or what this figure would be. Portsmouth City Council's *Authority Monitoring Report 2024/2025* (AMR 24/25), states that a 1:1.9 bedspace ratio has been applied to the HMO completions to provide a C3 dwelling equivalent figure, this is in accordance with national guidance, 4.3.5.¹ Therefore, we have assumed that this is the ratio that the Plan refers to. How can 1.9 bedspaces in an HMO realistically equate to a C3 dwellinghouse, which could house a family? This will result in an 8-bedspace sui generis being counted as equivalent to 4 C3 dwellings. The consequence of this will be that larger and larger HMOs will be granted

¹ 4.3.5 Bedspace ratio <https://media.portsmouth.gov.uk/wp-content/uploads/2026/04/PCC01-Annual-Monitoring-Report-2024-2025-accessible-aa.pdf>

planning permission in an attempt to meet unobtainable housing targets. HMOs conversions in Portsmouth have become larger in recent years: the majority of historic ones in the South of the city began as 3/4/5 occupancy, in recent years these have been extended by implementing permitted development rights and increased to 7/8 beds. In the north of the city the vast majority of new HMO conversions of 3 bed family homes use the 7/8/9 bed sui generis model. More HMOs threaten the residential character of Portsmouth North; many parts of Portsmouth South are already imbalanced. If the residential character is continually chipped away there is a real danger that it will never return and families will not want to settle in Portsmouth. At the present time every HMO application that comes before the Planning Committee is recommended for conditional approval by Officers. Guidance is largely ignored. Officers regularly say at Planning Committee meetings that Planning 'is not done by numbers.' The National Scheme of Delegation (NSD) will result in less scrutiny of HMO conversion applications, the outcome of this will be a decline in the standard of accommodation in Portsmouth. Incidentally HMOs are not referred to in the NSD, only Certificates of Lawful Development.

It is anticipated that the 11,369 housing target set out in the Plan will not be met and there will be a shortfall of 3,116, which equates to approximately 208 homes per annum, refer to Pre-Submission Portsmouth Local Plan Composite, Nov 2025 (P-SPLPC 25).² Portsmouth does not have a 5 year housing land supply; it stood at 2.4 years as of 31st March 2025, AMR 24/25, 4.3.10.³ Negotiations continue regarding whether other areas can help meet the target through the Duty of Cooperation. However, the scope of this may be affected by the existing uncertainty surrounding Local Government Reorganisation.

The Plan acknowledges that HMOs play a key role in housing delivery within Portsmouth. Just because 'change of use', in the shape of HMOs, has historically been relied upon to meet housing targets does not mean it is justifiable or sustainable. The cumulative impact of continuous HMO conversions is having a detrimental effect on the residential character and

² A10 Page 19 Development Targets https://media.portsmouth.gov.uk/wp-content/uploads/2025/12/PLP-Composite-Nov_2025.pdf

³ 4.3.10 - 5 Year housing land supply [PCC annual monitoring report 2024-2025](#)

amenity of Portsmouth North. Many parts of Portsmouth South are already irreversibly imbalanced. There is very limited opportunity to replace lost family housing elsewhere due to the City's unique geographical constraints, the limited availability of developable land due to the built-up nature of Portsmouth, flooding risk, nature conservation designations, as well as environmental considerations. In general terms, once a family home is lost, it will be lost forever.

Portsmouth City Council's AMR 2024/2025 says:

'The Council has continued to include houses in multiple occupation (HMOs) in its housing delivery and supply figures to reflect the increasing demand of HMOs within the City and the increasing role they play in meeting housing need.' 4.3.12.⁴

How do we know what the actual need for more and more HMO conversions are without any proper analysis? There are between 300 and 800 individual rooms to rent daily; the number constantly fluctuates due to the temporary nature of the accommodation. Anecdotally, there are numerous to let boards outside of existing local HMOs in North End. There is no definitive figure for how many HMOs are currently in operation within the city. However, Amanda Martin, MP for Portsmouth North, states on the HMO Action Guide page that there were 6000 estimated HMOs in Portsmouth in 2023.⁵ An official audit needs to be undertaken, with findings published, to clarify demand and the source of that demand.

Portsmouth City Council AMR 2024/2025 demonstrates the extent to which HMOs are relied upon, in an attempt, to meet unobtainable housing targets. Of the 257 gross dwellings completed in 2024/2025 146 (57%) were HMOs; this reliance is misplaced and unsustainable. Only 18% were family sized homes of 3 bedrooms or more, against Portsmouth City Council's own PCS19 target of 40% family housing, paragraph 4.4.1.⁶ HMO conversions are continually depleting the existing family housing stock.

⁴ 4.3.12 Page 25 [PCC annual monitoring report 2024-2025](#)

⁵ [Amanda launches campaign to tackle HMO's - Amanda Martin MP](#)

⁶ 4.4.1 Gross dwelling figure 24/25 [PCC annual monitoring report 2024-2025](#)

Whilst the target set for family-sized homes being completed is failing miserably by more than 50%.

It will be extremely difficult for the 588 new dwellings per annum to be achieved. Considering that only 257 gross dwellings were completed during the 2024 to 2025 monitoring period, even with the ‘stepped’ approach, the Plan target is more than double this amount each year. Between 2030 and 2040 approximately 843 new dwellings will be expected yearly. How exactly will this be achieved? A purely numerical assessment does not reflect the local circumstances. Housing net completions in Portsmouth in the past ten years (2015/16 – 2024/25) have averaged 416 dwellings per annum. During the past five years the average has been much lower at 199, this has been partly because a few inadequate large tower blocks were demolished, (P-SPLPC 25).⁷ This does demonstrate how finely balanced the housing supply in Portsmouth is and how upgrading older properties can have such an impact on delivery.

The Office for National Statistics Census for 2021 showed that a population increase of just 1.4% had taken place in Portsmouth since 2011: only a 2,900 population increase over the ten-year period.⁸ How can the Plan housing requirement of 11,369 be justified? We fear that a weak Plan, rather than protecting the city, will result in more reliance on the windfall contribution, and therefore more family homes being converted into HMOs. The consequence of this will be further intensification of the only island city and the already most densely populated city in the country, outside of London. The housing target may have increased but the lack of capacity and ability for Portsmouth to achieve that target remains the same.

Although larger development has been granted planning permission in Portsmouth, many proposals are slow to get started, this could be for numerous reasons including present financial uncertainty. HMO conversions are relatively short-term projects that can be turned around within weeks, ready to generate rental profit. The outlay can presumably be quite accurately quantified; therefore, the risk is less than with a larger build. PCC needs to have dialogue with local building companies to find a way forward. There are numerous ex-commercial and ex-industrial sites in

⁷ Page 187 Housing Targets Introduction https://media.portsmouth.gov.uk/wp-content/uploads/2025/12/PLP-Composite-Nov_2025.pdf

⁸ ONS Census 2021 [How life has changed in Portsmouth: Census 2021](#)

Portsmouth that require development, these could be used to meet housing targets. Many local residents refer to the old Kwik Save site in Stubbington Avenue, North End, which has been empty for years; the old News Centre in Hilsea; the old Debenhams building in Commercial Road, just to name a few. There may be unbeknown reasons why development has not taken place, but Portsmouth's citizens see these unsightly, empty buildings and wonder why they are being left to rot while the inadequate family housing stock is further depleted. Housing targets must be ambitious but at the same time realistic and achievable.

Everyone deserves a roof over their head, but it must be the right roof and not to the detriment of other much-needed types of housing. HMO accommodation is short term, usually a stop gap while more stable housing is sought, it should not be treated as comparable to permanent housing solutions. How can HMOs be included in meeting housing targets when conversions are directly depleting another source of much needed accommodation? Housing policy needs to be in a strong position to resist speculative development; the city has been heavily targeted for HMO conversion for at least the last 4 years. Portsmouth is located in a desirable location on the South Coast, with relatively cheap house prices for the area, and mainly high ceiling, terraced, Victorian properties that are attractive to HMO developers. Unsustainable development should not be relied upon to prop up housing target figures. What composition of housing stock is being taken for this purpose? What is the plan to keep families in Portsmouth? There appears to be a lack of strategy that is looking at the overall picture in preference to a quick fix. A sustainability appraisal is required. Residents need to have a real say in shaping the places where they live. The Plan has had very little public engagement which could be down to lack of awareness; we stumbled upon the consultation through a friend. We attended a drop-in event held at Cosham Library, there was no presentation, just a thick copy of the Pre-Submission Plan July 2024. Questions could be asked; however, it is very difficult to ask appropriate questions when the content is unfamiliar. Another barrier was the complicated, technical language used and multiple updates. The Plan should have an emphasis on sustainability; the continuation of family homes being converted into HMOs is not sustainable and is therefore unjustified. In addition, PCC should be taking an inclusive approach, HMO conversions do not need to comply to disabled access regulations, so therefore exclude a whole group of people.

Housing delivery is a major challenge in Portsmouth. Long term sustainable solutions are required. The Plan has taken 9 years in the making; housing targets are now higher than the Council had anticipated. HMOs are sticking plasters; if conversions of family homes are allowed to continue at the present rate the negative impact will be both devastating and irreversible. Portsmouth is at a finely balanced tipping point. There appears to be no overall strategy regarding family home HMO conversions, no accurate appraisal of the demand for further HMOs and no assessment of the long-term negative impact. Planning permission is granted on an ad hoc basis. There needs to be studies undertaken to assess how many family homes are being lost, at what rate, and how many are being replaced elsewhere. The City is not delivering family homes anywhere near its own policy requirement; it is delivering bedspaces and calling it housing supply. HMOs have been included within the 'windfall' category, almost as if to conceal their existence, instead of acknowledging the major contribution they have been making to housing targets. Portsmouth is a special case; this must be fully acknowledged so that achievable housing targets can be set. Now PCC is robbing Peter to pay Paul, in as much as family homes are being replaced by HMO conversions, this is simply escalating a different problem. The core principle in national planning policy is the presumption in favour of sustainable development; Portsmouth is unique and must be treated as such, up to date analysis must be undertaken to prove that unsustainable development is not causing more harm than benefit. City planners must ensure that infrastructure and services keep up with growth. The Plan must demonstrate that it contributes towards mixed and balanced communities, while ensuring that the amenity and quality of life of HMO occupiers and their neighbours are valued and protected. The city needs a clear strategic vision, rather than being led by unobtainable housing targets and being set up to fail.

Modifications to Strategic Policy PLP16.

2d) HMO conversions must not be counted towards the housing requirement dwelling target. The windfall allowance of 1,185 over the whole Plan period, which equates to 79 dwellings per annum, is **not justified**. It is not appropriate for the loss of much needed family housing to be counted towards housing targets. It is not clear what percentage of the windfall category will be met by family housing conversions to HMOs. It can be anticipated that HMO conversions will provide many more than the 79 dwellings in the windfall category per annum. Simply because HMO

conversions have been relied upon to shore up housing targets in the past does not mean that this is a sustainable option and should be continued; a sustainability assessment must be undertaken by Portsmouth City Council. There is no evidence that alternative, sustainable solutions are being adequately sought. There is currently no definitive figure regarding current HMO numbers operating within Portsmouth. These current failings make the policy unsound and unjustified.

6) A more realistic, achievable, housing target should be set with the acknowledgement that Portsmouth IS unique and MUST be treated as a special case.

Word count 2308.

Sources

[PCC annual monitoring report 2024-2025](#)

https://media.portsmouth.gov.uk/wp-content/uploads/2025/12/PLP-Composite-Nov_2025.pdf

[Amanda launches campaign to tackle HMO's - Amanda Martin MP](#)

[How life has changed in Portsmouth: Census 2021](#)