

Portsmouth City Council's Response to the Inspectors' questions for Matter 6 Optimising the use of land



Matter 6: Optimising the use of land

Issue: Have all reasonable opportunities been explored and taken to optimise the use of land and meet as much of the identified need for housing as possible?

This issue includes detailed consideration of policies PLP1 (part 7), PLP21 and PLP23.

Tall buildings

- 1) **Will the Plan's approach to tall building development, including the spatial extent of the Opportunity Areas for Tall Buildings (OATBs) shown on the Policies Map [KD04a], optimise the use of land and meet as much of the identified need for housing as possible?**
 - 6.1.1 Yes. In identifying the spatial extent of the OATBs it has been necessary to strike an appropriate balance between the need to maximise the delivery of new housing with wider geographical and planning considerations including for example, the need to avoid unacceptable harm to the City's heritage assets, and the character and appearance of its very extensive low rise (typically two storey) suburbs.
- 2) **Is the Plan's approach to tall building development, including the spatial extent of the OATBs, appropriately informed by supporting evidence, including the Tall Buildings Supplementary Planning Document [SPD02], the Tall Buildings Study [PCC02] and the evidence relating to housing density?**
 - 6.2.1 Yes the Plan's approach to tall building development is appropriately informed by supporting evidence. The related Tall Buildings SPD [SPD02], in particular paragraphs 6.2 - 6.48 sets out a criteria-based approach, and requires (at paragraph 6.2), the submission of a Tall Buildings Statement (TBS) to support the assessment of tall building proposals at the planning application stage. The Statement will need to address 16 design related criteria in detail, including: visual impact (paragraph 6.5); siting (paragraph 6.9); height (paragraph 6.11); effects on views and vistas (paragraph 6.15); alignment (paragraph 6.21); mass (paragraph 6.23); scale (paragraph 6.25); form (paragraph 6.27); urban grain (paragraph 6.30); streetscape (paragraph 6.33); architectural lighting (paragraph 6.35); public realm (paragraph 6.37); public access (paragraph 6.39); climatic impact (paragraph 6.41); neighbourliness (paragraph 6.44); and Materials (paragraph 6.46). At 6.5 (under visual impact), it also requires the submission of Accurate Visual Representations (AVRs), the purpose of which is to illustrate the impact of a tall buildings proposal from: its immediate context, the wider urban context, and any important views or vistas which the proposal may affect. Where appropriate, the AVRs must also illustrate the impact of a proposal from a number of 'strategic' viewing points, including the marine approaches to Portsmouth, Portsdown Hill, and Gosport Esplanade.
 - 6.2.2 The SPD and OATBs have been informed by a background Tall Buildings Study [PCC02]. This provides a high level analysis of a range of locational, townscape and land use factors considered to be of relevance to the siting of tall buildings in the City - including: urban grain; topography; views; proximity and relationship to Conservation Areas and Listed Buildings; movement including proximity to transport routes and nodes; proximity to City district and local retail centres; and wider character and land use attributes. These factors are considered to have appropriately supported judgements regarding the spatial extent of the OATBs.
 - 6.2.3 On this basis the Council considers that the Plan's approach to tall building development is appropriately informed by supporting evidence.

3) **Does the evidence base underpinning the Plan's approach to tall buildings appropriately explore the potential to optimise the use of land?**

6.3.1 Yes, the evidence demonstrates that the Council has sought to optimise the use of land, taking into account the wider range of geographical and planning constraints affecting the City. These are captured (alongside other factors) in the evidence base - The Tall Buildings Study [PCC02], and Tall Buildings SPD [SPD02] underpinning the Plan's approach to tall buildings.

4) **Is there justification for several of the OATBs identified in Policy PCS24 of the Portsmouth Plan [EDP01] not being taken forward for this Plan?**

6.4.1 Yes, the justification for not taking forward several of the OATBs - Whale Island, Horsea Island, Cosham Town Centre and Western Road / Southampton Road is provided in Portsmouth City Council's Response to the Inspectors' Initial Questions [PCC06], at question 9 (9.5-9.8).

6.4.2 Cosham has mistakenly not been removed from part 7 a) of PLP1, so a supplementary modification [PCC15] is now proposed to remove this from the Policy.

a) Development proposals for a tall building(s) will be supported provided it is located within the following preferred areas as identified on the Policies Map:

- The Hard
- City Centre/Dockyard/Portsmouth International Portsmouth City Council Kingston Crescent/Estella Road
- Fratton
- Tipner
- Port Solent
- ~~Cosham~~

5) **How has part 7 of PLP1 and the spatial extent of the OATBs influenced the number of homes anticipated for the sites allocated and identified in the Plan, and the city's capacity for housing more broadly?**

6.5.1 Criterion 7 of Policy PLP1 and its OATBs was taken into account in the preparation of the Housing and Economic Land Availability Assessment (HELAA) [HO04]. When a potential site was located in one of the OATBs, the number of potential homes was increased in response to this. This work was done in tandem with working out the potential density of the sites. This in turn was done in accordance with the emerging residential density policy PLP21. It should be noted that the HELAA was prepared iteratively at the same time as the two policies on tall building and residential density were being developed. Therefore, the potential housing number for each site was subject to change as the OATBs and the density zones were refined.

6.5.2 This is set out on a site-by-site basis in the Council's Response to the Inspectors' Initial Questions (IQR) [PCC06], at Q.8a.

6) **Does part 7 of Policy PLP1 set out a sufficiently clear and positively prepared approach to how tall building proposals will be considered in relation to both sites within and outside OATBs?**

6.6.1 Yes, the requirement at PLP 1, 7c to have regard to the Tall Buildings SPD (or future equivalent) ensures that irrespective of whether applications for tall buildings come forward within, or outside of an OATB, an applicant will be required (by both Paragraph 6.2 of the

SPD [SPD02] and the local submission list) to submit a supporting Tall Building Statement in support of any planning application. This requirement is clear and positively justified.

7) Is part 7 of Policy PLP1 otherwise positively prepared, justified, effective and consistent with national policy?

6.7.1 Yes, as detailed in the Tall Buildings Background Paper [TP07], Tall Buildings SPD [SPD02], Urban Characterisation Study [VD03], and the IQR [PCC06], at question 9 (9.5-9.8).

Residential density

8) Will the residential densities specified in Policy PLP21 and the corresponding density zones shown on in Figure 6.1 of the Plan optimise the use of land and meet as much of the identified need for housing as possible?

6.8.1 Yes, the aim of Policy PLP21 is to make as efficient use as possible of land within Portsmouth and therefore to help maximise the delivery of new housing. Under Policy PCS21 of the adopted Portsmouth Plan, high density zones of at least 100 dph are specified, whilst all other areas within the City should have a high density of no less than 40 dph. Following a review of past housing density completions, existing built form/densities and accessibility to key services and public transport, the Council has concluded that there is clear justification for specifying higher residential density thresholds and zones for the City, including the introduction of a medium residential density zone with a minimum density threshold of no less than 80dph. The evidence to support this is detailed in sections 4.4 to 4.6 of the Housing Background Paper [TP07] and the Urban Characterisation Study [VD03] ('the UCS'). The UCS [VD03] identifies areas in the City that are predominantly defined by residential densities greater than 40 dph. These include but are not limited to Fratton (62-75dph), Landport (58-69dph) and Southsea East (50-71dph).

6.8.2 The significant uplift in residential density thresholds through Policy PLP21 shows that the Council has taken steps to try and optimise the use of land and meet as much of its identified housing need as possible.

6.8.3 However, whilst optimising the use of land for development is important, high residential thresholds and zones are not appropriate for all areas in the City as it may result in poor-quality design and development that is unacceptably harmful to local character. This includes but is not limited to areas in Paulsgrove and Drayton & Farlington, as well as areas on the eastern corridor of Portsea Island. As highlighted in paragraph 129 of the NPPF, the 'desirability of maintaining an area's prevailing character and setting...' and 'the importance of securing well-designed, attractive and healthy places' are other factors that should be considered when setting density standards in the Plan. It is for that reason that low residential density thresholds and zones have also been specified under Policy PLP21.

9) Does the Plan provide for a significant uplift in the average density of residential development within centres and other locations that are well served by public transport, or has it otherwise been demonstrated that there are strong reasons why this would be inappropriate, in line with paragraph 130(a) of the Framework?

6.9.1 Yes, the Plan provides for a significant uplift in the average density of residential development within centres and locations that are well served by public transport. The majority of the high residential density zones (120dph), as per figure 6.1 of the Plan, are within areas where there is or will be high accessibility to public transport. Key public transport links within these areas include train stations, major bus routes, transport interchanges, the City's Park & Ride and ferry terminals. A significant uplift in the average density of residential development has also been applied to a number of centres as identified under Policy PLP28: Town Centres of the Plan. All City Centres, Town Centres and District Centres, as well as several Local Centres,

are either within high (at least 120dph) or medium (at least 80dph) residential density zones as per Policy PLP21.

- 10) **Are the residential densities taken forward by Policy PLP21 and the spatial extent of the zones shown in Figure 6.1 appropriately informed by supporting evidence, including the Urban Characterisation Study [VD03], past trends in densities as detailed in the Housing Background Paper [TP07], and the evidence relating to tall buildings?**
- 6.10.1 Yes, the residential densities taken forward by Policy PLP21 and the spatial extent of the zones shown in Figure 6.1 are appropriately informed by supporting evidence. Evidence from the UCS [VD03] is addressed in paragraphs 10.2 and 10.3 of the IQR [PCC06]. Past trends of densities achieved on site is addressed in paragraphs 10.4 to 10.8 of the IQR.
- 6.10.2 The OATBs, as identified under Policy PLP1 of the Plan, also influenced the spatial extent of the zones shown in Figure 6.1. The OATBs were based on a number of factors that were originally explored in the Tall Buildings Study [PCC02], such as the proximity and accessibility to sustainable transport modes and town centres within the City. These also correspond with paragraph 130 of the NPPF in regard to residential density, whereby there should be a significant uplift in the average density of residential development within centres and locations that are well served by public transport. In response to this, the high residential density zones under Policy PLP21 incorporate the OATBs to further optimise the use of land for housing within Portsmouth.
- 11) **Does the evidence base underpinning the Plan's approach to minimum residential densities appropriately explore the potential to optimise the use of land?**
- 6.11.1 Yes, the evidence base underpinning the Plan's approach to minimum residential densities has appropriately explored the potential to optimise the use of land. Please see the answer provided for Q.8 above and paragraphs 10.5 to 10.8 of the IQR [PCC06].
- 12) **Is there justification for several of the high density areas shown on Map 35 and promoted by Policy PCS21 in the Portsmouth Plan not being taken forward for this Plan?**
- 6.12.1 Yes, the following high-density areas shown on Map 35 promoted by Policy PCS21 of the adopted Portsmouth Plan have not been taken forward for this Plan:
- Southsea Town Centre, Albert Road District Centre and Elm Grove Local Centre;
 - Cosham Town Centre;
 - A section of the North End District Centre; and
 - Horsea Island Open Space.
- 6.12.2 It was not considered appropriate to keep Cosham Town Centre a high residential density zone as per the Regulation 18 version of the Local Plan. The update to the UCS [VD03] revealed that the 'areas of distinct character' associated with the character area of Cosham are predominantly defined by low density development, varying from 27dph to 33dph. Therefore, high density development would likely have a negative impact on the character of the wider area. Concern was also raised at a Members' workshop that high density in Cosham would be out of character. However, it acknowledged that the area of distinct character associated with Cosham Town Centre ('Central Cosham') contains the high street, key public transport links and the Queen Alexandra Hospital (including staff accommodation). There has also been recent mixed-use development along the high street. Further detail regarding the areas of distinct character can be found in paragraphs 3.202-3.206 of the Study [VD03]. In order to make more efficient use of the land, whilst also considering the wider 'area's prevailing character and setting' (paragraph 129.d) of the NPPF, the Council considers there is sufficient evidence to change Cosham Town Centre to a medium residential density zone under Policy PLP21.

6.12.3 The section of the North End District Centre to the north of the City Centre density zone has changed from high density to a medium density zone as this was considered more appropriate in terms of the existing character of the area.

6.12.4 In terms of Horsea Island Open Space, this is now being allocated as a new strategic open space for the City without any housing development under Policy PLP9 of the Plan. Therefore, it was longer appropriate for the area to remain a high residential density zone and has been changed to a low residential density zone.

6.12.5 The justification for the remaining areas listed above not being taken forward as high residential density zones in the Plan can be found in paragraphs 10.11 and 10.12 of the IQR [PCC06].

13) **How have the residential densities promoted by Policy PLP21 influenced the number of homes anticipated for each of the sites allocated and identified in the Plan, and the city's capacity for housing more broadly?**

6.13.1 Residential density was considered in the Housing and Economic Land Availability Assessment (HELAA) 2025 Report and Appendices [HO04]. However, as noted in paragraph 4.2.1 of the HELAA 2025 Methodology [HO03], professional judgement was used on a site-by-site basis to determine the capacity of sites assessed through the HELAA. This was based on a range of factors, including but not limited to density, pre-existing character of the area, building heights and site constraints, such as existing heritage assets and open space. In some cases a site assessed in the HELAA may have fallen within a high residential density zone as per Policy PLP21, but achieving the density specified by the policy would likely have required taller buildings, the end result of which would be development that would be unacceptably harmful to the existing character of the area. In those cases, a lower, more appropriate density was applied.

6.13.2 Furthermore, section 3.2 of the HELAA 2025 Methodology [HO03] highlights that the study "...should not be overly constrained by policy, as an important part of the review is to test the appropriateness of previously identified constraints." This reinforces the fact that there are a number of other elements to consider when determining a site's capacity for housing, and that HELAAs are prepared with a "policy-off" approach. The Council has to balance the need for housing against other objectives in order to achieve sustainable development in the City.

14) **How does the Council intend to approach decision-making where the indicative capacity of an allocated or identified site is below that promoted by Policy PLP21 for the area in which it would be located?**

6.14.1 In terms of approaching decision making on sites where the proposed capacity for a site is below that promoted by Policy PLP21, each application would of course need to be considered on its own merits, but as a general approach the Council envisages that it would accept the indicative capacity number of the allocated or identified site, even if this means not meeting the requirements of Policy PLP21. All allocated and identified sites were subjected to a detailed site assessment under the HELAA Report and Appendices 2025 [HO04]. An array of factors, such as site constraints, local character/context and planning history, were considered when determining the indicative capacity of the sites. As noted in paragraph 4.7.6 of the Housing Background Paper [TP07]:

"... appropriate housing densities depend on various factors, and that built form may be in part determined by urban design principles that combine layout, form and scale in a way that responds positively to its context."

6.14.2 This is supported by paragraph 129 a) - e) of the NPPF which highlights that there is an array of other factors to consider when determining appropriate densities, such as the area's prevailing character and setting.

6.14.3 The Council deems that given the detailed site assessment carried out through HELAA process, there is justification to accept an indicative capacity of an allocated or identified site which is below that promoted by Policy PLP21 for the area in which it would be located.

15) Is Policy PLP21 otherwise positively prepared, justified, effective and consistent with national policy?

6.15.1 Yes, as detailed in the Housing Background Paper [TP07] and IQR [PCC06] and supported by evidence in the UCS [VD03], Tall Buildings Study [PCC02] and HELAA Report and Appendices 2025 [HO04].

Estate renewal

16) How will the Plan's approach to estate renewal optimise the use of land and meet as much of the identified need for housing as possible?

6.16.1 The aim of Policy PLP23: Estate Renewal is to enable the redevelopment and regeneration of the Council's estates which contain ageing buildings in need of renewal. The Policy is there to provide guiding principles to help inform developments which may come forward unexpectedly (like those at the four tower blocks of Barkis House and Nickleby House, and Tipton House and Edgbaston House) so that there is not a policy vacuum when those developments come forward. Whilst none of the criteria focus on optimising the use of land, the criteria in the Policy are broad principles for these developments to follow and are not considered likely to undermine the efficient use of land. Other policies in the Plan, notably Policies PLP1: Design and PLP21: Residential Density will be used to optimise the use of land on these sites rather than Policy PLP23: Estate Renewal itself.

17) Is the Plan's approach to estate renewal including the identification and spatial extent of the Estate Renewal Areas specified in Figure 6.2 of the Plan, appropriately informed by supporting evidence, including the evidence relating to tall buildings and housing density?

6.17.1 Yes, the area allocations for Estate Renewal are based on the locations of where the City's estates are situated rather than relating to areas for tall buildings and the residential density zones. However, any development taking place within areas for tall buildings and residential density zones would additionally need to take into account policies PLP1: Design including the element regarding tall buildings and PLP21: Residential Density.

18) Does the evidence underpinning the Plan's approach to estate renewal appropriately explore the potential to optimise the use of land?

6.18.1 See answer to Question 16.

19) How has estate renewal influenced the number of homes anticipated for sites allocated and identified in the Plan, and the city's capacity for housing more broadly?

6.19.1 Projects for estate renewal, notably those which involve demolition of existing buildings and replacement developments (rather than repair of existing buildings), tend to result in a large increase in homes being provided on the sites once completed compared to the original schemes. At Somers Orchard, the sites of the former Leamington House and Horatia House are providing a net gain of 294 dwellings. The new schemes being proposed at the four tower blocks of Barkis House and Nickleby House, and Tipton House and Edgbaston House

(explained in more detail in the LPS Tower Blocks Topic Paper [PCC16]) are proposed to deliver a net gain of 412 dwellings. The Council is always keen to maximise opportunities on its estates to increase housing provision, by replacing old, inefficient buildings which have come to the end of their life with larger, more pleasant places for the community to live in, thus contributing positively towards increasing the City's capacity for housing.

20) Policy PLP23 supports comprehensive redevelopment of the Council's estates. In that context, what is the justification for including Paulsgrove Estate Renewal Area within the low density zone in Figure 6.1 of the Plan.

6.20.1 The inclusion of the Paulsgrove Estate Renewal Area within the low density zone as per Figure 6.1 of the Plan is justifiable by reference to the character of the surrounding area. The Renewal Area is located within the character area of Paulsgrove, which is defined by low-density development, as evidenced in paragraph 3.559 of the Urban Characterisation Study [VD03]. Portsdown Hill also lies directly to the north and any high residential development/taller buildings would likely interrupt views to and from Portsmouth, as noted in section 4.4 of the Tall Buildings Study [PCC02]. Therefore, it would not be contextually appropriate for Paulsgrove Estate Renewal Area to be within a higher density zone.

21) Is Policy PLP23 otherwise positively prepared, justified, effective and consistent with national policy?

6.21.1 Yes, policy PLP23 is positively prepared in that it will help to enable further future estate renewal projects as they come forward. It is justified as the Council has numerous estates and more sites will inevitably come forward for redevelopment over the coming years. The policy will be effective in guiding any proposals for redevelopment of estates and is consistent with the overall objectives of national policy.

Release of non-residential land for housing

22) Has the release of non-residential land been appropriately considered in determining the city's capacity for housing? In particular:

6.22.1 Yes, the release of non-residential land been appropriately considered in determining the city's capacity for housing.

a. Paragraph 7.6 of the Interim SA Report and paragraph A208 of the Plan indicate that the suitability of several employment sites has been considered for housing. Which sites have been considered, where is the reasoning set out as to whether they are suitable or not for housing, and have any been taken forward for housing in the Plan?

The release of existing employment sites has been considered in a number of evidence base studies. Firstly, the Business Needs, Site Assessments and Employment Land Study by Lambert Smith Hampton [TE01] assessed the market appeal of existing industrial estates, offices and employment sites in section 7 of the report. Table 9 of the study lists key potential new employment sites / redevelopment opportunities and table 6.1 below tracks their progression through the plan making progress and their current status.

Table 6.1: Employment sites considered for redevelopment in the Lambert Smith Hampton report [TE01]

Location	Report recommendation	HELAA ref	Local Plan status
Tipner/Horsea Island	B class employment	NE18, NE19	PLP3: mixed use PLP4: mixed uses PLP9: open space
Site West, Walton Road	Existing industrial site	DF08	Discounted by HELAA at Stage 1
Portsdown Main	Possibility of residential	PA06	PLP10: employment
Lynx House, Cosham	Prime development site, HMRC indicated vacate building in 5 years or so	COS11	Existing employment site and now being retained by HMRC
Sidings, Goldsmith Avenue	Potential future industrial site in central location	MI05	Still in use by Network Rail
Interchange Park	Cleared site, capable of development in short term	COP06	Planning permission for other non-commercial use fully implemented and development complete
53-55 Burrfields Road	Smaller opportunity to redevelop or refurbish existing two storey building	COP08	Portsmouth Plan Policy BF1 superseded by PLP52. Existing community facility still in active use
Teardrop Site, Portway	Very prominent site alongside M27, highway access and design/build constraints will impact on viability reflected in land value	n/a	Prominent but undevelopable land bound by motorway
Rear of Broad Oak Works	Likely to be disposed for new B Class development	COP04	Discounted by HELAA at Stage 1
Hilsea Bus Depot	Medium term opportunity subject to bus operator relocation to new depot	HI06	PLP14: mixed use
Former Saacke, Marshlands Spur	Being marketed for redevelopment	DF09	Development completed
PO Sorting Office, Slindon Street	Royal Mail undertaking operational review of property needs and anticipate this will be surplus to requirements	CD25	Allocated for 102 dwellings in Appendix 3: Housing Trajectory

Location	Report recommendation	HELAA ref	Local Plan status
Victory Business Centre	As stated in pro forma, inefficient building due for replacement and site more suitable for residential	n/a	Existing employment site run by the Council as an enterprise centre for small businesses
Claybank Spur	Large, older industrial buildings with redevelopment potential in medium term to be promoted	COP07	Discounted by HELAA at Stage 1

6.22.2 It can be seen from the table that all opportunities to re-develop non-residential sites identified in TE01 have been explored and actioned accordingly with a number of the sites allocated for housing in the Plan.

6.22.3 The BE Approach to Employment Land Study [TE03] also looked at the release of non-residential land for housing. The answer to question 6 of matter 3 summarised the findings of this study in regard to intensification and the release of non-residential land for housing.

6.22.4 The Housing and Economic Development Needs Assessment (HEDNA) (HO01) looked at a number of existing employment sites and considered their suitability for redevelopment for housing. This included Lakeside, which is described in paragraph 13.38 as 'the city's premier business park and is the only location available for larger office space. The park offers high quality, modern space, which meets the demand caused by the recent 'flight to quality' trend. It offers parking and an easier commute (for those who drive) than the City Centre as well as being accessible by public transport.' The overall rating and recommendation for the site on page 266 of the report is as follows: 'The strong recommendation is that housing is not suitable here as it would dilute the strong business offer and the new homes would be isolated from necessary residential amenities.'

6.22.5 The Housing and Economic Land Availability Assessment (HO04) identified Lakeside as site COS10. The suitability assessment of the site states that 'the site is not considered suitable for housing for two reasons. Firstly, it would diminish the high-quality business offer currently available on the site. Secondly, it is remote from local facilities, is bounded by busy roads and would be an isolated place to live.'

6.22.6 The Regulation 18 version of the Plan [PRE01] proposed the allocation of Lakeside for 50,000 m² of office floorspace. Draft policy S6 also stated that 'up to 500 dwellings could be supported over the longer term, if [it] can be demonstrated that the full employment allocation can no longer be implemented and where this would constitute sustainable development.' The fall back allocation of housing was not carried forward to the Pre-Submission Plan based on the strong evidence base that housing was not a suitable use for the site.

6.22.7 In conclusion it can be seen that there is a strong evidence base on the release of employment land for housing. Some existing and former employment sites are now allocated for the Plan whilst other are protected under Policy PLP26: Safeguarding Employment Land.

b. Has the potential release of employment land otherwise been appropriately considered, particularly in the context of the city's forecast employment land surplus?

6.22.8 Yes, the potential release of employment land has been appropriately considered through the plan making process. There is a small deficit against need for manufacturing / warehousing.

The surplus relates to offices only and is smaller than originally predicted as stated in the answer to question 2 of matter 3. As discussed above the release of employment land at Lakeside was actively considered but the evidence base was strongly in support of the site's retention for employment only.

c. Is the approach to safeguarding employment land in Policy PLP26 justified in the context of the forecast employment land surplus and constrained housing land availability position?

6.22.9 Yes, the approach to safeguarding employment land in Policy PLP26 is justified in the context of the forecast employment land surplus and constrained housing land availability position. It should be noted that Policy PLP26 does not prevent changes of use, but simply adds a policy test to ensure that the City does not lose existing employment premises that are fit for purpose. It is also relevant to consider paragraph 7.4 of the Lambert Smith Hampton study [TE01] which states that 'We do recognise that there are individual premises that may not, due to their disorderly or 'scruffy' nature, perform well in terms of quality and receive a low assessment, but are still fit for that purpose. From the ranking system it is clear that the older, tertiary estates such as those at Hilsea or Copnor score poorly as they have failings in several categories. They do have a rightful and important place in the market and unless the condition of the buildings have exceeded their economic life or a wholesale redevelopment is justified, they need to be allowed and protected to satisfy demand for those needs to be met.'

d. Has the potential for mixed use development within town centres been appropriately explored?

6.22.10 Yes, the potential for mixed use development within town centres was appropriately explored in the HELAA (HO04). Appendix 7 classifies all the HELAA sites for housing, employment and mixed uses. It should be noted that criterion 8 of Policy PLP28: Town Centres allows for the development of housing in town centres as part of a mixed use scheme.

Other considerations

23) Are the Plan's policies that potentially have density or viability implications, such as those relating to affordable homes (Policy PLP17), housing mix (Policy PLP18), space standards (Policy PLP22), 20 percent biodiversity net gain (Policy PLP40) and tree cover (Policy PLP41), justified in the context of the proposed shortfall against local housing need?

6.23.1 Yes, Policies PLP17, PLP18, PLP22, PLP40 and PLP41 are justified in the context of the shortfall against local housing need on the basis that achieving sustainable development necessarily involves balancing a wider range of economic, social and environmental objectives.

6.23.2 With regard to PLP17: Affordable Homes, section 4 of the Housing and Economic Development Needs Assessment (HEDNA) Update 2025 [HO02] sets out the high level of affordable housing need in Portsmouth, estimating a need of 763 affordable homes per annum for households unable to buy or rent housing on the open market. This is why PLP17 is an ambitious policy, to try and maximise the provision of affordable housing, and help meet that need, which in turn contributes towards meeting overall housing need.

6.23.3 With regard to Policy PLP18: Housing Mix, the housing mix proposed is based on the need identified in the section 7 of the Housing and Economic Development Needs Assessment (HEDNA) 2023 [HO01]. As noted in paragraph 61 of the NPPF, 'the overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for

the local community.' Policy PLP18 aims to achieve an appropriate mix of housing types for the local community which will help to provide mixed and balanced communities.

- 6.23.4 The space standards proposed under Policy PLP22 are in line with paragraph 135 f) of the Framework and supported by the findings set out in section 5 of the Residential Space Standards Background Paper [TP04]. The adoption of the NDSS would contribute to improving living standards for residents all across the City.
- 6.23.5 Policy PLP40: Biodiversity Net Gain (BNG) does not require 20% BNG on all sites. Instead, it seeks provision on those parts of the following sites owned by the Council namely Portsmouth City Centre, Lakeside and Somers Orchard. The Council wishes to lead by example in helping to address the 'Nature Emergency' the Council declared in 2022, by providing more than the statutorily required level of BNG. This is not anticipated to contribute significantly to reducing the potential for housing on the two sites where housing is proposed.
- 6.23.6 Policy PLP41: Trees & Hedgerows looks to address the significant lack of tree cover in the City by requiring 15% tree canopy cover on schemes for major development. As the provision of tree canopy cover to meet this policy can be "stacked" with other requirements such as BNG, this Policy is not considered likely to significantly reduce the potential number of homes which can be accommodated on sites for major development.
- 24) **Following the Housing and Economic Land Availability Assessment [HO04] indicating that there are insufficient sites to meet housing needs, was the assessment revisited in line with the PPG¹, including by changing assumptions about the development potential of particular sites?**
- 6.24.1 Yes. The 2023 iteration of the Housing and Economic Land Availability Assessment (HELAA) [HO08] informed the Pre-Submission Portsmouth Local Plan 2024, which had already revealed that there were insufficient sites to meet housing needs. The HELAA carried out in 2025 [HO04] involved revisiting the 2023 assessment to see if the methodology adopted had been appropriate and maximised the potential number of sites coming forward as well as the number of dwellings on each site. It also involved a further call for sites to see if more sites had become available since 2023.
- 6.24.2 Whilst the methodology was slightly amended for the 2025 HELAA compared to the 2023 version, the overall approach taken in the 2023 HELAA was found to be appropriate, and it did not unreasonably reject sites as unsuitable. The new call for sites yielded very few new sites.
- 6.24.3 The approach to site capacity is not straight forward. In the HELAA Methodology 2023 [HO07] Table 2A states:
- 6.24.4 'Where the capacity of the site has not been identified by the landowner/site promoter, a standard density of 40 dph on 80% of the site has been used in the first instance to determine eligibility for assessment for residential development. This is a ready reckoner at this stage and is adjusted where applicable as the site goes through the assessment process (i.e. to take constraints into account).'
- 6.24.5 When this was reviewed as part of the preparation of the 2025 HELAA it was considered to be an appropriate approach. However, the author of the 2023 version of the HELAA left the Council before the 2025 version was prepared. When preparing the 2025 HELAA, it was difficult to ascertain from Table 2A of the 2023 HELAA how the methodology described had been applied in establishing site capacity, as there were no calculations indicating, for

¹ Reference ID: 3-025-20190722

example, how many dwellings have been removed from a site's capacity as a result of a particular constraint.

- 6.24.6 The original site capacities were therefore reviewed, and where these seemed unrealistic, either too high or too low, these were adjusted based on professional judgement, as reflected in the revised Table 2A in the HELAA Methodology 2025 HELAA [HO03]. Professional judgement involved taking into account the nature of the area the site was located within (for example how accessible the site area was), and the density which had been calculated for the 2023 HELAA in case that seemed unreasonably low. It should also be noted that several sites in the HELAA are proposing conversions of offices over shops, particularly in the City Centre. For those sites, due to them involving the conversion of existing buildings, there was limited scope to increase the figure substantially.
- 6.24.7 Given that City largely consists of largely brownfield sites and areas of high density, means that applying a simple formulaic approach to calculating site capacity is often not appropriate. As indicated in the Council's answer to question 8 of the Inspectors' Initial Questions (IQR) ['PCC06] many of the site capacity figures have been taken from planning permissions, planning applications, and pre-application discussions. These are usually based on masterplans prepared by architects working for clients who will clearly want to optimise the use of their land, so are considered robust. In short, in assessing each site, capacity was calculated based a realistic estimate of what might come forward.
- 6.24.8 Having established that housing needs were unlikely to be met in Portsmouth, the Council engaged with neighbouring authorities through the Duty to Cooperate from the early stages of plan-making to establish if needs could be met elsewhere, as documented in the Duty to Cooperate Statement [DTC01], and the numerous statements of common ground with other authorities [SCG01-13].

25) Have Council owned assets been duly considered in identifying potential housing sites?

- 6.25.1 Yes, Council owned land was a source of sites which fed into both the 2023 and 2025 HELAAs. The relevant Council departments were contacted when preparing both versions of the HELAA to feed in available sites for development. For sites considered at stage 2 of the HELAA Report and Appendices 2025 [HO04], the site source is noted on the site assessment proformas in the bottom right corner (site source). For ease of reference, a list of Council-owned sites included in the Plan is provided below:

- NE19: Tipner West
- CD17: City Centre North (mostly owned by PCC)
- CD37: Arundel St - Shopmobility
- PA01: Port Solent (PCC owned but on a long term lease)
- ST11: Somers Orchard
- EC14: Eastney Swimming Pool
- ST03: Open space at Stone Street
- CD07: Bridge Centre
- CD10: Maxstoke Close Car Park
- CD15: Hertford Place
- HI01: Hilsea Lodge
- PA16: Amenity land off Newbolt Ed & Bodmin Rd
- SJ16: Wimbledon Park Sports Centre
- ST01: City Records Office
- ST02: 32-60 Middle Street (mostly owned by PCC)
- CD94 Barkis House & Nickleby House (newly proposed to be added post-submission)
- ST29 Tipton Housing & Edgbaston House (newly proposed to be added post-submission).

26) **Drawing together the responses in relation to the above questions for matter 6, and all other relevant evidence, is it clear that all reasonable opportunities have been explored and taken to optimise the use of land and meet as much of the identified need for housing as possible?**

6.26.1 Yes, the Council has left no stone unturned in exploring all opportunities to identify sites for housing, having carried out a further call for sites and prepared a new HELAA in 2025, revisiting the previous HELAA from 2023. Having identified the sites it has, the Council has also set about drafting policies which will help ensure the amount of development accommodated on sites can be maximised, whilst at the same time balancing the need for sustainable development. This has included having a policy identifying Opportunity Areas for Tall Buildings, and residential density zones showing large areas where higher and medium density development should be delivered. It also involves facilitating the redevelopment of the Council's ageing estates, so that these can deliver increases in housing when opportunities arise to demolish and replace existing tower blocks.