

Portsmouth City Council's Response to the Inspectors' questions for Matter 8 Housing policies



Matter 8: Housing policies

Issue: Whether the Plan is positively prepared, justified, effective and consistent with national policy in relation to the housing policies in Chapter 6 of the Plan?

This issue includes detailed consideration of policies PLP17 to PLP20, PLP22 and PLP24.

PLP17: Affordable Homes

1) **Are the proposed affordable housing requirements within the policy justified and supported by the evidence? In particular, what is the justification for:**

a. The tenure mix specified in part 1(b)?

8.1.1 The justification for the proposed tenure mix is set out in paragraph 6.3.3 of the Affordable Housing Topic Paper [TP06].

'The HEDNA (2023) and HEDNA Update (2025) both show a greater need for social/affordable rent than for affordable home ownership products, but neither recommends a specific split between these for policy-making purposes. So, the split set out in section 1(b) of the policy of 70% affordable rent and/or social rent, and 30% affordable home ownership has been selected based on discussions with the Council's Housing Department, and is consistent with the approach taken in the DVA. Whilst the NPPF now requires that planning policies should specify the type of affordable housing required including the minimum proportion of social rent homes required, the Council has decided not to require a specific amount of social rent homes, instead leaving the 70% element flexible on how this is split between affordable rent and social rent. This is because requiring a specific level of social rent would negatively impact on viability, such that it would reduce the overall level of affordable housing which could be delivered. The supporting text at paragraph 6.35 explains that social rents will be prioritised.'

b. Requiring affordable housing contributions from older persons housing?

8.1.2 The Council does not consider that older persons' housing should be exempt from the requirement to provide affordable housing contributions, noting that there is nothing in national policy or guidance which suggests this should be the case.

8.1.3 It is the Council's view that it is not necessary or proportionate to set a separate affordable housing target for each and every type of development. In particular, it is anticipated that viability will be considered at the development stage including for older persons housing in line with the PPG:

'Should viability be assessed in decision taking?

Where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Policy compliant in decision making means that the development fully complies with up to date plan policies. A decision maker can give appropriate weight to emerging policies.

Such circumstances could include, for example where development is proposed on unallocated sites of a wholly different type to those used in viability assessment that informed the plan; where further information on infrastructure or site costs is required; where particular types of development are proposed which may significantly vary from standard models of development for sale (for example build to rent or housing for older people); or where a recession or similar significant economic changes have occurred since the plan was brought into force.

Paragraph: 008 Reference ID: 10-008-20190509'

- 8.1.4 It has been the Council's practice to accept commuted sums / payments in lieu of affordable housing provision in specialist older persons schemes. The challenges around mixed tenure schemes are well understood, as are the practicalities around service charges and the like. Such commuted sums are best calculated at the time of the planning application, being the difference in the value of a scheme with affordable housing and without affordable housing.

c. Viability reviews to be undertaken in part 4?

- 8.1.5 Justification for this is set out in paragraph 6.3.8 of the Affordable Housing Topic Paper. The PPG (Para 010 Reference ID: 10-010-20251216) states that plans should set out circumstances where review mechanisms may be appropriate, and part 4 of Policy PLP17 does this. Given the extent of the need for affordable housing in the City, the Council wishes to maximise the potential to secure affordable housing, thus considers it appropriate to include the review mechanism set out in part 4 of the policy.

2) Have the viability implications of the policy been adequately assessed for the different forms of residential accommodation to which the policy would apply?

- 8.2.1 Yes, as noted in paragraph 6.3.13 of the Affordable Housing Topic Paper, the Development Viability Assessment (DVA) [HO15] included the assumption that policy PLP17 would apply to all residential development. The typology approach used in the DVA looks at lots of different forms of residential accommodation, including standard housing, and older persons housing (see paragraphs 9.17-9.20) and student accommodation (see paragraphs 9.21-9.22).

- 8.2.2 Also see the Council's answer to Question 1b above.

3) Is there justification for the policy to not specify the minimum number of Social Rented homes required, as set out in paragraph 64 of the Framework?

- 8.3.1 Yes, as set out in paragraph 6.3.3 of the Affordable Housing Topic Paper [TP06]. This has been explained via modification MM71 in the Main Modifications [PCC03 V1.0], which proposes adding the following text to the end of paragraph 6.23 of the Plan:

'Whilst national policy requires planning policies to specify the type of affordable housing required, including the minimum proportion of social rent homes required, the Council has chosen not to set a specific requirement for social rent due to potential impacts on the overall viability of affordable housing. To add a specific requirement for social rent would negatively impact on viability, meaning that less affordable housing could be delivered overall. Social rent is already included in the requirement for 30% of affordable housing provision to be either affordable/social rent, and the Council has decided not to be more specific than this.'

- 8.3.2 Paragraph 3.2.2 of the Affordable Housing Topic Paper [TP06] notes that the HEDNA Update [HO03] shows that provision of at least 75% of rented affordable housing at social rents could be justified but explicitly says at paragraph 4.71 that 'this will need to be considered alongside viability evidence.'

- 8.3.3 As can be seen from Tables 10.6 and 10.7 of the DVA [HO15], the impact of seeking social rent rather than affordable rent is equivalent to a reduction in the overall requirement for affordable housing. Furthermore, most affordable housing that has been delivered in the past in Portsmouth has been affordable rent rather than social rent.

8.3.4 Paragraph 6.35 of the supporting text to the policy makes it clear that whilst the Council has decided not to have a rigid policy split between social and affordable rented housing, social rents should be prioritised where delivery does not prejudice the overall delivery of affordable homes.

4) **Is the policy otherwise positively prepared, justified, effective and consistent with national policy?**

8.4.1 Yes, as supported by evidence in the HEDNA Update [HO02], the Affordable Housing Topic Paper [TP06], and the Development Viability Assessment [HO15].

PLP18: Housing mix

5) **Have the viability implications of the policy been adequately assessed?**

8.5.1 Yes, the Development Viability Assessment (DVA) [HO15] assessed viability against all proposed policies in the Plan and looks at Policy PLP18 in particular in paragraphs 8.11-8.17. Paragraph 9.10 also notes that policy requirements in terms of mix are reflected in the DVA modelling.

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

8.6.1 Yes, the policy is informed by evidence from the HEDNA 2023 [HO01] and the Development Viability Assessment [HO15]. The Housing Mix specified under the policy is based on the recommended housing mix identified in the HEDHA 2023 [HO01], which is summarised in table 5.6 of the report. The HEDNA 2023 [HO01] also identifies a need for accessible and adaptable dwellings and wheelchair user dwellings (M4(3)), which is summarised in paragraphs 10.53 to 10.57 of the report, and is why the Council makes provision for such housing in the policy.

PLP19: Housing for specific groups

7) **Does the policy provide an appropriate strategy for addressing the needs of housing specific groups and is this supported by the evidence base? In particular, is it sufficiently clear where different forms of housing will be supported and how development proposals will be assessed?**

8.7.1 Yes, the policy is supported by the findings detailed in sections 11 and 8 of the HEDNA 2023 [HO01], which identify that the provision of housing for the specific groups listed under the policy should be supported.

8.7.2 The policy is deliberate in not specifying locations and/or site allocations where the different forms of specialist housing identified will be supported. This embeds a reasonable level of flexibility into the Plan to enable development to respond to changing viability/demands over the plan period. The Council also does not wish to inhibit the delivery of housing, especially given the City's current unmet housing need.

8.7.3 In terms of how development proposals will be assessed, specific criteria are provided for development proposals that relate to purpose built student accommodation (PBSA), Build to Rent homes and communal or co-living homes, which must be met in order for such proposals to be permitted. The policy does not set out specific criteria for development proposals relating to the other types of specialist housing as the need will be determined on a site-by-site basis: paragraph 6.93 of the Plan states that 'developers should work with the Council to identify the need for specialist housing and suitable site provision.'

8) **Is the policy otherwise positively prepared, justified, effective and consistent with national policy?**

- 8.8.1 Yes. The policy supports the provision of specialist housing to address the needs of specific groups within the City, which is consistent with paragraph 63 of the NPPF. This will foster the creation of inclusive places across the City. As evidenced in the answer to question 7 above, the policy is justified by the findings set out in sections 8 and 11 of the HEDNA 2023 [HO01].

PLP20: Houses in multiple occupation

9) **Are the proposed criteria for development proposals for houses in multiple occupation justified and supported by the evidence base?**

- 8.9.1 The proposed criteria continue replicate those set out in the Houses in Multiple Occupation (HMO): ensuring mixed and balanced communities Supplementary Planning Document, [SPD08] dated October 2019. The criteria were introduced in response to the evidenced need to maintain an appropriate mix and balance within communities to meet needs for share housing without resulting in unmanaged impacts on social infrastructure and community cohesion (see Update on Houses of Multiple Occupation HO17). The current HEDNA [HO01], identifies that Portsmouth retains a significantly higher proportion of HMOs than the national average, a difference that is not attributed merely to being a university city (see Table 8.4 p141 of the HEDNA [HO01]), meaning that it remains appropriate to plan positive to support HMOs within the correct places within the City.
- 8.9.2 The key criteria have been extensively reviewed and compared to other similar Local Plan criteria across England (see para 3.2.8-3.2.12 of HO17) and have been subject to Sustainability Appraisal [KD09 p41] and the proposed policy is reflective of both the national approach of managing high levels of HMO supply and of promoting sustainability.

10) **Is the policy otherwise positively prepared, justified, effective and consistent with national policy?**

- 8.10.1 Yes, as informed by the HEDNA [HO01] and the comparison with Local Plans across the County. As the proposed policy reflects the development management approach that has been in operation through the SPD for a significant period of time there is no basis to consider that it would not be effective and it can be noted that there is no specific national policy in respect of HMO shared living accommodation.

PLP22: Space standards

11) **Is the adoption of the Nationally Described Space Standards appropriately justified by evidence?**

- 8.11.1 The adoption of the nationally described space standards (NDSS) is supported by the findings set out in section 5 of the Residential Space Standards Background Paper [TP04]. Analysis of past housing completions (2017-2020) showed that not all property types met NDSS; in particular, only 32% of one-bed, one person dwellings met the NDSS. It is important that adequate living standards are provided to residents across all housing types/tenures. The Council has proposed modification MM78 in the Main Modifications [PCC03 V1.0] to paragraph 6.123 of the Plan to reference the Residential Space Standards Background Paper [TP04].
- 8.11.2 In addition, Portsmouth has a number of areas ranked amongst the highest levels of deprivation in the country, including 15 Lower Layer Super Output Areas (LSOAs) ranked in the 10% most deprived in England¹. The adoption of the NDSS would contribute to improving living standards for residents all across the City.

¹ <https://documents.hants.gov.uk/Economy/IndexofMultipleDeprivation.pdf>

- 8.11.3 The Council proposes adding a modification to paragraph 6.124 of the Plan to reference the 2025 Index of Deprivation as follows:

Portsmouth has a number of areas ranked amongst the highest levels of deprivation in the country^{FN}. The City needs to work to improve living standards for all its residents; it is important therefore that the NDSS is formally adopted in the Local Plan to avoid the creation of substandard dwellings, particularly to protect those who may have fewer housing options available to them.

^{FN}<https://documents.hants.gov.uk/Economy/IndexofMultipleDeprivation.pdf>

- 8.11.4 Based on the above, the Council considers that the adoption of the NDSS is appropriately justified by evidence.

12) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

8.12.1 Yes, as evidenced in the Residential Space Standards Background Paper (TP04).

PLP24: Gypsies, Travellers and Travelling Showpeople

- 13) **Does the Gypsy and Traveller Accommodation Assessment [HO14] provide a sufficiently robust assessment of the needs of Gypsies, Travellers and Travelling Showpeople?**

8.13.1 Yes, the Portsmouth Gypsy and Traveller Accommodation Assessment (GTAA) [HO14] provides a robust assessment of the needs of Gypsies, Travellers and Travelling Showpeople. The GTAA was prepared by Opinion Research Services (ORS) who have carried out many similar GTAAs for numerous Councils (as referenced in paragraph 3.3 of the GTAA) and have prepared the GTAA in line with Government policy and guidance at the time it was prepared (February 2024). The methodology used for the GTAA is set out in section 3 of that document.

- 14) **Is the Plan justified in not allocating permanent sites for Gypsies, Travellers and Travelling Showpeople during the plan period?**

8.14.1 Yes, the Plan is justified in not allocating permanent sites for Gypsies, Travellers and Travelling Showpeople because the findings of section 8 of the GTAA [HO14], which covers the period 2023-2040, establish that there is no identified need for either Gypsies, Travellers or Travelling Showpeople.

- 15) **Is the Plan justified in not allocating transit sites and stopping places given the evidence of previous short-term encampments in the city in particular?**

8.15.1 Yes, the Plan is justified in not allocating transit sites and stopping places as this follows advice in paragraph 7.30 of the GTAA [HO14] which indicates that there is no need for any formal transit provision in Portsmouth. Instead, it is recommended that the Council continues to monitor the situation, which is the approach proposed in the Plan at paragraph 6.146.

- 16) **Is not seeking to address unmet needs in Winchester District justified?**

8.16.1 Given the constrained island geography of Portsmouth, there is a limited supply of land for development. The City is therefore currently unable to meet its own housing need and as such, is not in a position to help meet any of Winchester District's unmet needs for Gypsies and Travellers. It is for that reason the Plan is justified in not seeking to address the unmet needs for Gypsies and Travellers in Winchester District. The agreed position between both authorities regarding this matter is detailed in paragraphs 3.13 to 3.23 of the February 2026 Statement of Common Ground with Winchester District Council [SCG12].

17) Does the policy provide a positively prepared approach in setting criteria for sites to come forward and is it justified and consistent with the Planning Policy for Traveller Sites 2024?

8.17.1 Yes, the policy is positively prepared, justified and consistent with Planning Policy for Traveller Sites 2024 [NAT24]. As the GTAA [HO14] demonstrates that there is no current need for sites for Gypsies, Travellers and Travelling Showpeople, the Council's criteria-based policy at PLP24 allows for these sites to come forward should a need arise in the future, providing an appropriate policy framework for the assessment of planning applications for such sites. This is in line with paragraph 11 of Planning Policy for Traveller Sites 2024 which states that 'Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward.'

8.17.2 Planning Policy for Traveller Sites 2024, paragraph 10e) indicates that in producing their Local Plan, local authorities should protect local amenity and environment, which is reflected in the criteria for policy PLP24. Paragraph 13 of Planning Policy for Traveller Sites 2024 sets out further requirements for policies, which are also reflected in policy PLP24.

18) Is the policy otherwise positively prepared, justified, effective and consistent with national policy?

8.18.1 Yes, as documented in the evidence of the GTAA [HO14] and SoCG with Winchester District Council [SCG12].