

Portsmouth City Council

HOUSING BACKGROUND PAPER

December 2024

Portsmouth Local Plan



Executive summary

- This Housing Background Paper provides a clear, evidence-based rationale to support Strategic Policy PLP16: Housing Target of the emerging Portsmouth Local Plan. Linked to this, the paper also provides evidence and justification for Development Management Policy PLP21: Residential Density.
- The paper demonstrates Portsmouth's response to existing national policy, which states that while the Government's standard method should continue to form the basis for assessment of local housing need, the outcome of the standard method is an advisory starting point for establishing a housing requirement.
- The paper summarises the range of housing needs identified in the Housing and Economic Development Needs Assessment, including appraisal of the outcome of the Government's standard method which generates a need of 899 homes per year to 2040, and concludes that exceptional circumstances which would lower the housing need figure do not exist in Portsmouth.
- The paper explains that the emerging Local Plan allocates or identifies all deliverable and developable sites, which have been comprehensively assessed for suitability, availability, and achievability in line with the Housing and Economic Land Availability Assessment methodology and national policy. But it is highlighted that the supply does not meet need as defined by the standard method.
- In order to help increase housing delivery in the City, the paper details the ambitious approach taken to residential density for development of new homes, and provides the evidence to support areas of high, medium and low density across the City.
- The results of Duty to Cooperate discussions in relation to other authorities helping to meet some of Portsmouth's unmet need are presented, with 800 homes being delivered by Fareham, and 570 homes being potentially delivered by Winchester.
- The paper provides clear evidence to support the emerging Local Plan's capacity-based housing target of 680 new homes per year. This target takes forward the Local Plan's development strategy and responds to the City's development needs, land supply and constraints. The target does not meet objectively assessed housing need generated through the Government's standard method, even once the contributions from other authorities under the Duty to Cooperate have been taken into account.
- The paper identifies a robust five year housing land supply of 5.73 years from the anticipated date of the emerging Local Plan's adoption in 2025. This is supported by the Housing Trajectory, covering the plan period to 2040.

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1. Introduction

- 1.1 The purpose of this paper is to set out the evidence and justification behind the Portsmouth Local Plan housing target contained in Strategic Policy PLP16: Housing Target of the emerging Portsmouth Local Plan. Linked to the housing target, the paper also considers the evidence behind Development Management Policy PLP21: Residential Density.
- 1.2 The Portsmouth Local Plan has been prepared and will be examined under the National Planning Policy Framework (NPPF) published in December 2023. The majority of this Housing Background Paper, therefore, relates to the December 2023 NPPF, and where references are made to the NPPF it should be taken as referring to the December 2023 version, unless otherwise stated.
- 1.3 The main evidence base documents discussed are: the Housing and Economic Development Needs Assessment (HEDNA, Dec 2023¹); and the Housing and Employment Land Availability Assessment (HELAA, Dec 2023²). These documents provide recently prepared, comprehensive and robust evidence sources that are drawn on throughout the paper.
- 1.4 This paper begins by considering housing need, continues by looking at housing supply and available land, followed by a section on housing density and the Duty to Cooperate. Setting the housing target is then considered, followed by a calculation of the five year housing land supply on adoption of the Local Plan, and the Housing Trajectory for the plan period. A final section is then included on the 2024 consultation on the draft NPPF which will inform future Local Plans.

¹ Icen Projects (Dec 2023) *Portsmouth Housing and Economic Development Needs Assessment*
https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/4-Portsmouth-HEDNA_Final-Report-Dec-2023-CONFIDENTIAL-1.pdf

² Portsmouth City Council (Dec 2023) *Housing and Economic Land Availability Assessment*
https://www.portsmout.gov.uk/wp=content/uploads/2024/08/02-PCC_Housing-and-Employment-Land-Availability-Assessment_2023-Report_FINAL-latest-version-for-CDL.pdf

2. Portsmouth's Housing Need

2.1 Introduction

- 2.1.1 The first stage in establishing a housing target is to establish housing need. This section of the report looks at how the Council's housing need figure was derived, first looking at national policy requirements, followed by findings from the Council's Housing and Economic Needs Assessment (HEDNA, Dec 2023).

2.2 National Policy Context

- 2.2.1 In paragraph 60, the NPPF sets out the Government's aim to significantly increase the supply of new homes. To determine the minimum number of homes needed, it requires that strategic policies be informed by a local housing need assessment, conducted using the standard method in national planning guidance (paragraph 61). The same paragraph continues by stating that:

'The outcome of the standard method is an advisory starting point for establishing a housing requirement for the area. There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals.'

- 2.2.2 Footnote 25 of the same paragraph expands on the meaning of exceptional circumstances by stating: *'Such particular demographic characteristics could, for example, include areas that are islands with no land bridge that have a significant proportion of elderly residents.'*
- 2.2.3 It is worth noting that consultation on the proposed changes to the NPPF carried out in December 2022 included a longer explanation of exceptional circumstances, adding: *'or university towns with an above-average proportion of students'* which did not then end up being included in the subsequently published version of the NPPF (Dec 2023), on which this Local Plan is based. Given that the reference to university towns was left out, the Council has assumed that having an above-average proportion of students is not considered to be an exceptional circumstance.

2.3 Evidence on Housing Need

- 2.3.1 This section sets out the evidence on Portsmouth's housing need. The main evidence base study is the HEDNA, which provides up to date, robust and proportionate evidence to inform Portsmouth's emerging Local Plan.
- 2.3.2 The HEDNA contains, amongst other things, assessment and analysis of the following:
- Housing need in the context of the Government's standard method;
 - Demographic and housing stock baseline analysis; and
 - Housing market insight.
- 2.3.3 The HEDNA also provides comprehensive background information on the City's economic baseline, and projected growth and need for commercial, industrial and

warehousing uses. Whilst this largely informs the Plan's employment development strategy and policies, the HEDNA analyses the link between economic growth and housing supply, to calculate the number of new homes that may be needed to house a growing labour supply.

The standard method for assessing local housing need

- 2.3.4 In 2018, the Government amended the NPPF and Planning Practice Guidance (PPG) to introduce a 'standard method' for calculating housing need, which the NPPF and PPG state that local planning authorities should use as the starting point for assessing needs unless there are exceptional circumstances.
- 2.3.5 The standard method involves a four-stage approach, drawing upon ONS data inputs. The first step is to establish a demographic baseline of household growth, derived from the 2014-based household projections, using the annual average household growth over a ten-year period. The HEDNA found that for Portsmouth, this resulted in growth of 7,449 households (745 per annum) over the ten-year period of 2023 - 2033.
- 2.3.6 The second step is to apply an affordability uplift to take account of market signals. This leads to increases in housing need where house prices are high relative to income. To calculate this, the published median affordability ratios from ONS are used based on workplace-based median house price to median earnings ratio for the most recent year. For each 1% increase in the ratio of house prices to earnings, above 4, the average household growth should be increased by 6.25%. For Portsmouth, the HEDNA found that the ratio of house prices to earnings for 2022 was 7.31, giving an uplift of 21%, leading to a housing need of 899 dwellings per annum.
- 2.3.7 The third step is to apply a cap of 40% on any increase arising from step 2. For Portsmouth, step 2 leads to an increase of only 21%, less than the 40% cap, therefore, the cap does not need to be applied.
- 2.3.8 The fourth step is to apply a 35% uplift to the 20 largest urban areas in England. Portsmouth is not listed as one of the 20 largest urban areas, therefore the 35% uplift does not need to be applied.
- 2.3.9 The HEDNA concluded that for Portsmouth, the standard method figure at the date the HEDNA was published (Dec 2023), was 899 dwellings per annum.

Evolution of the standard method

- 2.3.10 There has been some uncertainty about how the standard method would evolve since its introduction in 2018. Following the publication of the 2016-based household projections in September 2018, the standard method figure for Portsmouth (and many other Local Authority areas across the country) dropped significantly. This led to Government concern that the impact of councils using the 2016-based projections would be that housing delivery would drop, and nationally, the aggregate figure would not then achieve the Government target at the time of 300,000 homes per year. To address this, the Government published proposed revisions to the NPPF and PPG confirming that the previous 2014-based projections should continue to be used even though more up-to-date household projections had been published.

- 2.3.11 The Government also consulted on a change to the standard method in summer 2020 which would have seen a shift to increased delivery in areas of the country with lower affordability. The proposed approach would have resulted in a slight fall to the target for Portsmouth as one of the more affordable areas to live nationally, however, this approach was abandoned, and the Government decided to revert to the previous position but with an uplift in the target for the 20 largest cities in the country (December 2020 revised methodology). Portsmouth is not included in the list of the 20 largest cities.
- 2.3.12 Table 1 sets out how the standard method figure for Portsmouth has changed over time since its introduction.

Table 1: The evolution of Portsmouth's Standard Method outputs over time

Date	Change	Annual Figure (dwellings per annum)	Equivalent for Plan Period 2020-2040 (dwellings)
Sept 2017	Initial consultation	835	16,700
May 2018	Revised affordability	863	17,260
Sept 2018	2016-based household projections	595	11,900
Oct 2018	Revised NPPF	863	17,260
May 2019	Revised affordability	867	17,340
Dec 2020	Revised methodology	855	17,100
Apr 2021	Revised household projections and affordability	872	17,440
Dec 2022	Revised household projections and affordability	906	18,120
Jan 2023	Revised household projections	910	18,200
Apr 2023	Revised affordability	899	17,980
Jan 2024	Revised household projections	894	17,880
Mar 2024	Revised affordability	897	17,940
Jan 2025	Revised household projections	891	17,820

- 2.3.13 Table 1 above shows that the housing need, derived from the standard method at the time the HEDNA was published (Dec 2023) was 899 dwellings per annum. The standard method changes twice a year, once in January as the projections are pushed on one year, and once in March when the affordability ratios are published. Table 1 includes the changes which have been made to the standard method figures since the HEDNA was published (this includes the January 2025 which post-dates this Housing Background Paper as those figures were already available). As the HEDNA was published in December 2023, and plan-making preparation was well advanced by that point, the 899 figure was used to inform the Portsmouth Local Plan and the Duty to Cooperate

discussions with the City's neighbours. This only differs slightly from the more recent figures.

2.4 Consideration of Exceptional Circumstances

- 2.4.1 As previously noted, the NPPF allows for alternative approaches to the standard method to be used to generate housing need figures if exceptional circumstances are found to apply. The HEDNA has explored if exceptional circumstances exist in Portsmouth in order to justify a different starting point for housing need. However, it should be noted that it is not clear from either the NPPF or PPG what the threshold for demonstrating exceptional circumstances is. At the time of writing the HEDNA, the consultants who prepared it were not aware of any local authorities having adopted a plan based on a lower housing need figure than the standard method, though the HEDNA does acknowledge that some local authorities have adopted housing requirements below their need due to capacity constraints while others have exceeded it.
- 2.4.2 The HEDNA reviewed the PPG on this matter. Paragraph 015 Reference ID: 2a-015-20190220 outlines that where an alternative approach to the standard method is used which results in a figure higher than the standard method, this may be acceptable as it exceeds the minimum starting point, but *'Where an alternative approach results in a lower housing need figure than identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination. Any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method.'*
- 2.4.3 A higher need than the standard method could be considered to meet the unmet need of other authorities (this is considered in Section 5 of this Housing Background Paper). Alternatively, a higher figure may be related to economic growth, or infrastructure improvements which might increase growth. In Portsmouth, the City Deal³ seeks to deliver 2,370 homes at Tipner and Horsea Island and 58,000 square metres of employment space for the growing marine and advanced manufacturing sectors of the Solent economy. However, as noted in the HEDNA, this is well below overall need and therefore is not driving a higher figure than the standard method. The City Deal does include infrastructure improvements, but whilst this is a consideration, the HEDNA notes that this is not driving growth, but unlocking it.
- 2.4.4 The PPG also gives other circumstances where a need figure higher than the standard method might be set. Recent delivery rates can be used to justify higher levels of need. However, the HEDNA noted that net completions between 2006/07 and 2022/23 average 402 dwellings per annum, lower than the standard method figure, so this does not justify setting a higher level of need.
- 2.4.5 The PPG also suggests that previous assessments of need could justify setting a higher level of need than the standard method. The PUSH SHMA⁴ (2014) assessed the City's

³ <https://www.gov.uk/government/publications/city-feal-southampton-and-portsmouth>

⁴ GL Hearn (Jan 2014) *South Hampshire Strategic Housing Market Assessment*
<https://www.push.gov.uk/wp-content/uploads/2018/06/SHMA-2014-1.pdf>

need as 740 dwellings per annum over the period 2011 - 2036. This is below the standard method figure so did not suggest going higher than the standard method. Portsmouth's adopted Local Plan⁵ (2012) has a target of 584 dwellings per annum over the period 2006 - 2027. Again, this is lower than the standard method figure so did not suggest adopting a higher need figure than the standard method.

- 2.4.6 Although, as noted above, the PPG makes clear that the 2014-based household projections must be used to inform the standard method, the HEDNA looked at more recent data to see how this differed from the 2014-based household projections. The HEDNA found that the 2014-based household projections appear to have over-estimated population growth. Looking at trend-based population projections, using information on birth rates, death rates and migration from the last ten years, this would suggest an increase in households equivalent to 543 dwellings per annum, which would increase to 655 dwellings per annum after applying the affordability uplift. This is lower than the standard method figure of 899. However, the HEDNA considered how Portsmouth's statistics compare to those of other similar authorities and found that these differences are not unique to Portsmouth, albeit Portsmouth's divergence is the greatest out of the different authorities considered.
- 2.4.7 Analysis of housing completions is presented in the HEDNA to see if suppressed housing delivery has reduced household formation, and it was concluded that this does not point to lower growth being due to reduced housing delivery. Past delivery rates of housing net completions (excluding C2) in the City between 2011 and 2022 averaged 313 homes per annum, while in the five years 2018 - 2023 this had fallen to 152 homes per annum.
- 2.4.8 The HEDNA also considered the link between economic forecasts (job growth) and housing needs and considered a range of scenarios which pointed to a need for 431 - 634 dwellings per annum over the 2021 - 2040 period to support the level of jobs likely to exist in the City over the Plan period, in order to house a growing labour supply. At a maximum of 634 dwellings per annum, this figure is less than the standard method figure of 899 dwellings per annum.
- 2.4.9 The overall conclusion of the HEDNA was that exceptional circumstances were not found to exist in Portsmouth to justify using a different starting point to housing need than the standard method. The Council accepted that exceptional circumstances do not exist in Portsmouth and therefore, the standard method figure of 899 dwellings per annum was used as the measure of housing need to inform plan-making.

⁵ Portsmouth City Council (Jan 2012) *The Portsmouth Plan: Portsmouth's Core Strategy*
<https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/The-Portsmouth-Plan.pdf>

3. Housing Supply and Available Land

3.1 Introduction

- 3.1.1 Having accepted the standard method figure of 899 dwellings per annum as the measure of housing need for Portsmouth, the next step was to establish if that need could be met. This section starts by looking at national policy on housing supply and land availability, considers the City's constraints, and continues by presenting the findings from housing monitoring data, and the Housing and Economic Land Availability Assessment (HELAA, Dec 2023), including consideration of windfalls.

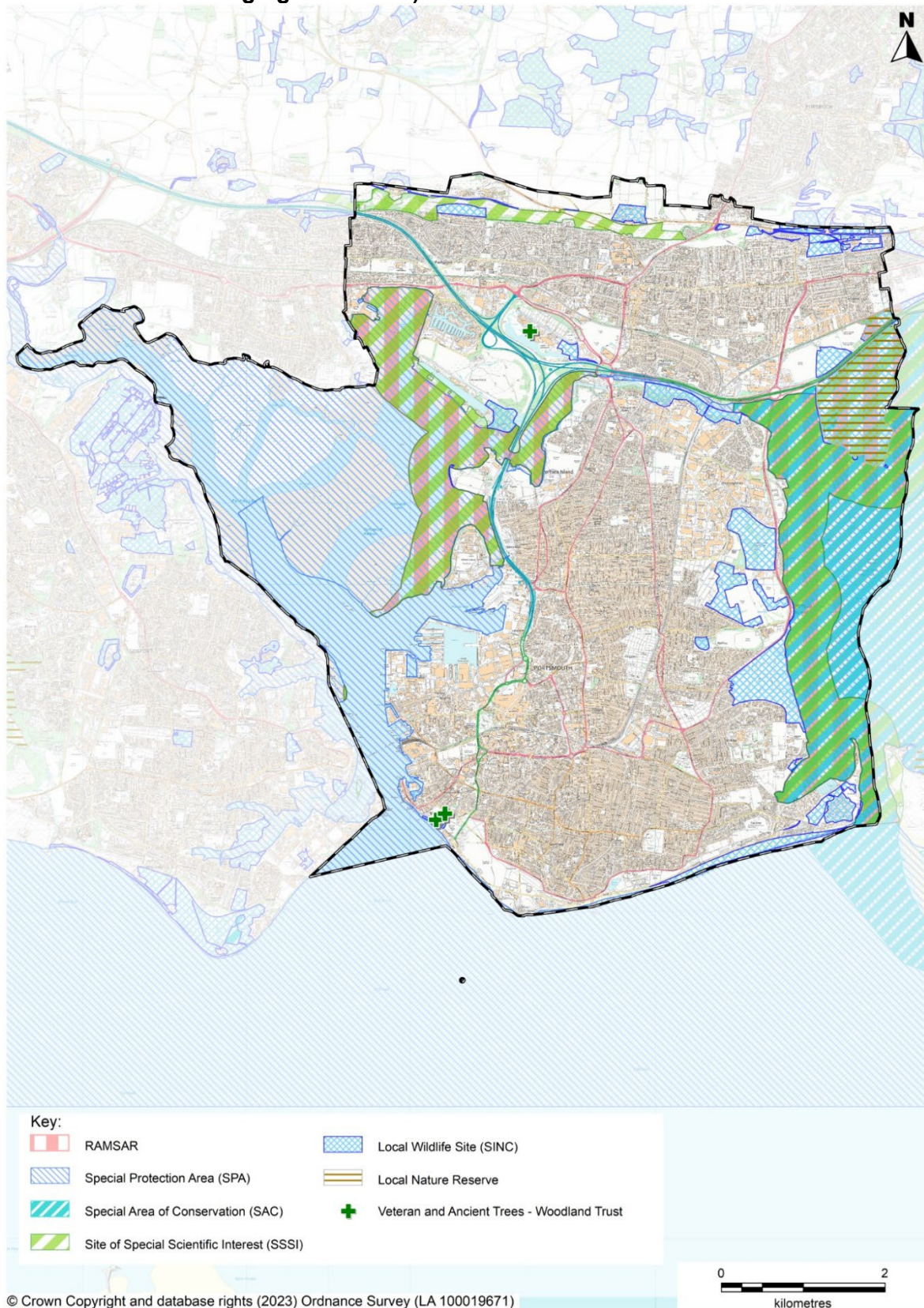
3.2 National Policy Context

- 3.2.1 In identifying land for new homes, the NPPF (paragraph 69) sets out that strategic policy-making authorities should have a clear understanding of land available in their areas, by preparing a strategic housing land availability assessment. This should identify a sufficient supply and mix of sites, taking into account availability, suitability and economic viability. The NPPF goes on to outline that a supply of specific, deliverable sites should be identified for the five years following the intended date of adoption of the Local Plan; and specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.
- 3.2.2 The NPPF highlights the role of small and medium sized sites in contributing towards meeting an area's housing requirement, indicating that an allowance can be made for windfall sites as a source of supply.

3.3 Portsmouth City's Constraints

- 3.3.1 The City of Portsmouth is a highly constrained authority, which has a significant impact on land supply, and availability of land for development. The constraints to development include: the City's island geography, its nature conservation and heritage designations, contaminated land, flooding, and the limited land availability due to its already highly built-up nature. These constraints are outlined in the wider evidence base for the Local Plan, but some of the constraints (namely nature conservation designations and the built-up nature of the City) can be seen below in Figure 1 taken from Figure 9.2 of the emerging Local Plan. Figure 1 shows the lack of land left after excluding the existing built-up area and nature conservation designations.

Figure 1 Designated nature conservation sites in Portsmouth (taken from Figure 9.2 of the emerging Local Plan)



3.4 Portsmouth's Housing Supply

- 3.4.1 This section of the Background Paper sets out the evidence on Portsmouth's housing supply for the period 2020 - 2040. Housing supply at Portsmouth is monitored through, and based on, a range of sources. The detailed monitoring of completions, permissions and new supply (C3, C2, students and Houses in Multiple Occupation (HMOs)) is carried out on an annual basis (1 April - 31 March) by Hampshire County Council (HCC) in partnership with Portsmouth City Council. The outcome of the monitoring is summarised within the Authority Monitoring Report (AMR). The latest data available during plan making was for the 2022/23 monitoring year, so any completions or permissions which may have been granted after 31 March 2023 are not included in the figures below, as that data was not available to inform plan making. Supply data for the 2023/24 monitoring year will be published early in 2025 in the AMR, after the Local Plan has been submitted for examination.

Net Completions (sites with capacity of 5 or more dwellings) 2020 - 2023

- 3.4.2 The first element of supply considered was the number of net completions which had been recorded as having taken place since the start of the plan period, i.e. between 2020/21 and 2022/23. In this section, net completions of sites with capacity of 5 or more dwellings are considered, sites of less than 5 dwellings are considered separately under the small sites windfall section. Net housing completions in this section do not include HMO net completions which are also considered separately, but do include C3 losses to HMOs which have been deducted from the figures. Completions of C2 dwellings have been included but only where these are for use by students. C2 student figures are supplied as the C3 dwelling equivalent on a 1 dwelling: 2.5 bedspaces basis, i.e. 2.5 student bed spaces are equivalent to 1 C3 dwelling.
- 3.4.3 The data for net completions for sites of 5 or more dwellings is presented in Table 2 below.

Table 2: Net Housing Completions for sites of 5 or more dwellings 2020/21 - 2022/23

Year	C3 Completions for sites of 5 or more dwellings	C2 Student Completions (equivalent C3 dwellings)	Total Completions
2020/21	222	31	253
2021/22	92	7	99
2022/23	-47	0	-47
Total	267	38	305

- 3.4.4 It can be seen in Table 2 that during the 2022/23 monitoring period, there was a net loss of 47 dwellings (Class C3), which was exceptional. This was due to the demolition of Horatia House and Leamington House in Somerstown during that monitoring year, comprising a loss of 272 dwellings in total. These sites are to be redeveloped, which will result in new dwellings being delivered in future monitoring years to replace those lost. The net loss in 2022/23 does not therefore, suggest a trend towards negative C3 completions.

- 3.4.5 The total completions for the period 2020/21 - 2022/23 arising from all C3 and C2 student net completions of 5 or more dwellings is **305 dwellings**. This is comprised of the total of 267 dwellings from C3 completions for sites of 5 or more dwellings, and 38 equivalent dwellings from C2 student completions.

Permissions outstanding as of 31 March 2023

- 3.4.6 Permissions outstanding as of 31 March 2023 includes all C3 residential permissions, and equivalent dwellings from C2 student accommodation development, but does not include HMO permissions, which are accounted for in their own category.
- 3.4.7 Data received from HCC for C3 residential outstanding permissions as at 31 March 2023 was 1,058 net dwellings (this figure has been adjusted to take account of superseded planning permissions and to avoid double counting).
- 3.4.8 The C3 residential outstanding permissions figure is then supplemented with the figure for C2 student outstanding permissions. As noted earlier, C2 student figures are converted to C3 dwelling equivalent on a 1 dwelling: 2.5 bedspaces ratio, i.e. 2.5 student bed spaces are equivalent to 1 C3 dwelling. As at 31 March 2023, there were 736 student accommodation net bedspaces committed in outstanding permissions, giving a C3 equivalent figure of 295 dwellings.
- 3.4.9 As a result, the identified supply of housing from outstanding permissions as of 31 March 2023 was **1,353 dwellings**. This was comprised of 1,058 dwellings from C3 permissions, and 295 dwellings equivalent from C2 student accommodation permissions.
- 3.4.10 A non-implementation discount was applied to the outstanding permissions figure to recognise that not all permitted schemes get built out based on evidence of housing delivery in the City. It also acts as a buffer for any uncertainties in the estimated delivery of individual sites.
- 3.4.11 To establish the level of non-implementation discount appropriate to apply in Portsmouth, past delivery from permitted sites was reviewed. Table 3 below on housing implementation rates, illustrates that for the 2011 to 2019 period, an average of 85% of the dwellings with planning permission were built. Data for the 2019 - 2022 period was not utilised due to the construction industry having been significantly impacted by both the issues surrounding nutrient neutrality and the Covid-19 pandemic.

Table 3: Housing implementation rates in Portsmouth 2011 to 2019

	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	Average per year (%)
Permitted dwellings	1182	316	286	505	368	936	239	291	
Completed dwellings	276	351	222	406	436	393	408	183	
% permitted dwellings completed	23.35	111.08	77.62	80.40	118.48	41.99	170.71	62.89	85.81

3.4.12 Considering the data in Table 3 above, a non-implementation discount of 15% was applied to outstanding planning permissions. This totals **203 dwellings** (15% of 1,353) which was included in (subtracted from) the overall housing supply calculations for the emerging Local Plan.

3.5 Available Land based on the HELAA

- 3.5.1 The HELAA is the Council's main evidence base study on available land within the City. The purpose of the HELAA is to demonstrate the availability of land for housing (and employment) for development, showing how land may be brought forward to meet local development requirements. The Council updates the HELAA on a regular basis (normally annually), to ensure an accurate representation of land availability within the City. The most recent version of the Portsmouth HELAA is dated December 2023, having a base date for information of 01 April 2023. The HELAA has not been updated in December 2024 due to the Local Plan being submitted at that time, and the submitted Plan being based on the December 2023 version of the HELAA.
- 3.5.2 The HELAA Methodology⁶ document (Dec 2023) is published separately to the HELAA itself, and sets out the approach adopted by the Council in detail, whereas the HELAA Report provides a comprehensive picture of the potential deliverable and developable housing and employment sites across the city, and indicates which sites have been discarded as neither deliverable nor developable. The HELAA findings are a 'snapshot' of information held at the time it was compiled and was prepared in accordance with national policy and planning practice guidance. As noted in the HELAA Methodology document, the most recent 'call for sites' was undertaken in winter 2021. However, as noted in paragraph 8.2 of the HELAA Methodology document, the Council has continued to accept new sites for the HELAA throughout the assessment process. In addition, the Brownfield Land Register is updated annually, and so if any further sites had become available since winter 2021, these would have been identified via the Brownfield Land Register.
- 3.5.3 As previously noted, Portsmouth is a highly constrained authority. Table 2C of the HELAA Methodology document lists the constraints considered at Stage 1 of the HELAA to be 'show-stoppers' that fundamentally impact a site's suitability and/or achievability and therefore, cannot be considered deliverable or developable, these are listed below:

⁶ Portsmouth City Council (Dec 2023) *Housing and Economic Land Availability Assessment: Methodology* https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/5-01-PCC_Housing-and-Employment-Land-Availability-Assessment_Methodology_FINAL-1.pdf

- site not available;
 - site in existing employment site but put forward for non-employment use as a whole or in the majority;
 - site within functional flood plain (Flood Zone 3b) or largely or wholly affected by flood risk;
 - sites including or within the immediate setting of heritage assets of the highest significance;
 - sites entirely or within the majority of protected open spaces (as identified in a made Neighbourhood Plan);
 - sites within areas of significant nature conservation importance;
 - sites identified as Core or Primary sites for Solent Waders and Brent Geese.
- 3.5.4 Appendix 1C of the HELAA lists the sites which were discounted at Stage 1. The most common reason listed is that it has not been possible to confirm availability.
- 3.5.5 Sites which were not found to have any show-stopping constraints were assessed in detail in the Stage 2 assessment of the HELAA. Appendix 2 of the HELAA lists the sites which were discounted at stage 2 for being unsuitable, unavailable, or unachievable. A total of 15 potential housing sites were rejected at stage 2. The reason each site was rejected is provided in section 4.2 of the HELAA.
- 3.5.6 **The HELAA identified 94 sites with potential for development, either being deliverable or developable. All of these sites were included in the Local Plan either as strategic sites, site allocations, or sites identified in an appendix from the 2023 HELAA.**

Strategic Sites

- 3.5.7 The HELAA identified four strategic sites suitable for allocation, namely:
- City Centre (made up of 13 HELAA sites);
 - St James' and Langstone Campus;
 - Tipner;
 - Fratton Park & Pompey Centre.
- 3.5.8 The site at Tipner was subsequently split into two separate strategic allocations: Tipner West & Horsea Island East, and Tipner East. Whilst the proximity of Tipner (west and east) to constraints would normally have resulted in these sites being sieved out at stage 1 of the HELAA, these were retained for assessment at stage 2 due to part being allocated in the adopted Portsmouth Plan (2012), the fact that Tipner East was subject to live planning applications and also having funding for development via the City Deal. The range of dwellings allocated for Tipner West & Horsea Island East is 814 - 1,250 homes with the lowest of the range having been used for the Local Plan allocation. The lower number is required as part of the City Deal whilst the upper number provides certainty for the HRA in terms of impact on the integrity of the national and internationally designated sites.
- 3.5.9 Together the five strategic sites that included an element of housing were anticipated to accommodate 7,155 dwellings. This is broken down by site in Table 4 below:

Table 4 Strategic Sites

Strategic Site Name	No. of dwellings (net)
City Centre	4,158
St James' and Langstone Campus	417
Tipner West & Horsea Island East	814
Tipner East	1,056
Fratton Park & Pompey Centre	710
Total	7,155

Site Allocations

3.5.10 The HELAA identified five site suitable for site allocations (non-strategic), namely:

- Port Solent;
- St John's College;
- Fraser Range;
- The News Centre, Hilsea; and
- Somers Orchard, Somerstown.

3.5.11 Together the five site allocations were anticipated to accommodate 1,511 dwellings. This is broken down by site in Table 5 below:

Table 5 Allocations

Site Allocation Name	No. of dwellings (net)
Port Solent	500
St John's College	212
Fraser Range	134
The News Centre, Hilsea	100
Somers Orchard, Somerstown	565
Total	1,511

Sites Identified from the HELAA 2023

3.5.12 Only sites offering multiple benefits over and above housing delivery were allocated, but after taking into account strategic sites and site allocations, this left 72 sites remaining as 'other identified sites in the HELAA'. These did not offer so many benefits and were not considered large enough to require a site allocation which would warrant an accompanying site-specific policy. So, instead of being allocated, these were *identified* for development. The identified sites are split into two categories: small/medium sites less than 1ha with capacity for 5 or more dwellings, and sites greater than 1ha with capacity for 5 or more dwellings. The decision to identify sites in an appendix was based on advice received during an advisory meeting with the Planning Inspectorate in August 2023 and clearly demonstrated that NPPF paragraph 70(a) was satisfied; this requires that at least 10% of the housing requirement is being met by sites no larger than 1ha.

3.5.13 Table 6 below lists the identified small and medium sites of less than 1ha with the capacity for 5 or more dwellings.

Table 6 Identified small/medium sites of less than one hectare with capacity for 5 or more dwellings (taken from Appendix 2 of the emerging Local Plan)

HELAA 2023 Site ref.	Site Name	Area (ha)	0-5 years	6-10 years	11-15 years	>15 years	Total net dwellings
BA01	Coniston Avenue	0.28	0	11	0	0	11
BA02	West of Milton Road	0.47	0	0	20	0	20
BA03	Garages on Kendal Avenue	0.15	0	0	10	0	10
CD02	Car Park, Crasswell Street	0.03	0	5	0	0	5
CD04	The Invincible, Wickham Street	0.03	42	0	0	0	42
CD05	Car Park, College St	0.16	0	0	60	0	60
CD06	Rosemary Lane, Garages	0.04	0	0	20	0	20
CD07	Bridge Centre, Fratton	0.38	0	115	0	0	115
CD10	Maxstoke Close Car Park	0.12	0	5	0	0	5
CD11	27 - 29 Kingston Road	0.03	7	0	0	0	7
CD15	Hertford Place	0.16	0	17	0	0	17
CD20	Durham Street	0.42	0	0	50	0	50
CD21	Port Royal Street Industrial Area, East of Somers Road	0.17	0	0	20	0	20
CD29	28-42 Lake Road	0.08	0	40	0	0	40
CD65	117-127 Fratton Road	0.18	0	30	0	0	30
CD73	Maitland Street	0.20	0	5	0	0	5
CD75	Venture Tower Fratton Road	0.09	0	38	0	0	38
COP01	Brynwell Builder's Yard, 207-217 Copnor Road	0.10	20	0	0	0	20
COP02	Green Lane Garages	0.05	0	5	0	0	5
COP03	Copnor Methodist Church	0.14	0	15	0	0	15
COS01	Cosham Health Centre, Vectis Way	0.33	70	0	0	0	70
COS02	Community Centre, Cosham	0.28	0	50	0	0	50
COS03	Westmoors 50 London Road Cosham	0.07	0	10	0	0	10
COS04	Former Cosham Police Station	0.28	0	60	0	0	60
COS06	Cosham Fire Station	0.17	0	50	0	0	50
CS01	139 - 141 Goldsmith Avenue	0.07	0	0	12	0	12
CS02	163 Goldsmith Avenue	0.07	0	0	20	0	20
CS06	227-231 Goldsmith Avenue	0.09	25	0	0	0	25
DF02	Karen Avenue	0.45	0	6	0	0	6
EC02B	Land at Halliday Crescent	0.13	0	5	0	0	5
EC07	4 Waverley Road	0.12	0	5	0	0	5
EC08	1A Beatrice Road	0.02	5	0	0	0	5
EC14	Eastney Swimming Pool and part of Southsea Leisure Park	0.88	8	0	0	0	8
FR02	Car Sales, Cornwall Road	0.07	0	10	0	0	10
FR03	Nancy Road Car Park	0.12	0	5	0	0	5
FR04	46- 50 Kingston Road	0.03	11	0	0	0	11
FR06	St Wilfrids Church, 49 George Street	0.09	8	0	0	0	8

HELAA 2023 Site ref.	Site Name	Area (ha)	0-5 years	6-10 years	11-15 years	>15 years	Total net dwellings
HI01	Hilsea Lodge (Highgrove)	0.48	24	0	0	0	24
HI02	Land of former supermarket, Stubbington Avenue	0.18	0	20	0	0	20
HI08	Museums Store, Copnor Road	0.27	0	0	10	0	10
MI03	142 Milton Road (former Pickwick Pub)	0.08	12	0	0	0	12
MI07	185-191 Highland Road	0.04	8	0	0	0	8
NE02	Smeaton Street Garages	0.02	0	5	0	0	5
NE03	Former Police Station, Kingston Crescent	0.41	0	60	0	0	60
NE05	205 London Road	0.02	0	8	0	0	8
NE06	Blue Anchor PH, 2 London Road	0.03	0	6	0	0	6
NE07	Former Barclays 82 London Road	0.03	9	0	0	0	9
NE09	98 London Road	0.18	30	0	0	0	30
NE20	305-307 Twyford Avenue	0.03	6	0	0	0	6
NE22	Land at Heathfield Road	0.08	0	15	0	0	15
PA03	140 Southampton Road	0.16	0	20	0	0	20
PA15	Land at Bude Close	0.09	0	5	0	0	5
SJ02	71 -73 Palmerston Road	0.03	6	0	0	0	6
SJ04	61-63 Marmion Road	0.06	0	5	0	0	5
SJ08	Former Grosvenor Casino, Osborne Road	0.09	0	10	0	0	10
SJ12	82-88 Clarendon Road	0.04	10	0	0	0	10
SJ16	Wimbledon Park Sports Centre	0.23	0	10	0	0	10
ST01	City Records Office	0.35	0	50	0	0	50
ST02	Middle Street	0.19	163	0	0	0	163
ST03	Open space at Stone Street	0.28	0	18	0	0	18
ST04	Wightlink Car Park	0.35	0	0	60	0	60
ST05	Car Park, Wiltshire Street	0.07	0	0	50	0	50
ST07	Derelict Land, Warwick Crescent	0.04	7	0	0	0	7
ST09	Wellington Street Garages	0.02	0	5	0	0	5
ST12	Cathedral House	0.07	0	8	0	0	8
ST14	7 Kings Road, Southsea	0.10	0	8	0	0	8
TOTALS			471	740	332	0	1,543

3.5.14 As can be seen from Table 6 above, a total of **1,543** dwellings were identified from small/medium sites of less than 1ha with capacity for 5 or more dwellings.

3.5.15 Table 7 below lists the identified sites over 1ha with capacity for 5 or more dwellings but which were not considered large enough for allocation.

Table 7 Identified sites more than one hectare with capacity for five or more dwellings (taken from Appendix 3 of the emerging Local Plan)

HELAA 2023 Site ref.	Site Name	Area (ha)	0-5 years	6-10 years	11-15 years	>15 years	Total net dwellings
CD01	Wardroom	2.71	0	200	0	0	200
DF06	East Lodge Farm (PCC owned)	1.25	0	0	25	0	25
DF07	Court Lane Yard	1.88	0	0	70	0	70
EC11	Southsea Marina	4.49	0	12	0	0	12
PA04	Beacon View Academy	1.33	0	70	0	0	70
PA08	Land at Marsden Road, Paulsgrove	1.79	0	0	80	0	80
TOTALS			0	282	175	0	457

3.5.16 As can be seen from Table 7 above, a total of **457** dwellings were identified from sites over 1ha with capacity for 5 or more dwellings.

3.5.17 As with planning permissions, a non-implementation discount of 15% was applied to the sites identified from the HELAA. This was to ensure that any uncertainties in the estimated delivery of individual sites was taken into account. This equates to **300 dwellings** (15% of 2,000) which was removed from the supply of dwellings from sites identified from the 2023 HELAA.

3.6 Small sites windfall (sites with capacity of <5 dwellings)

3.6.1 The Council's main mechanism for identifying and monitoring opportunities for future development is the HELAA. However, in accordance with national planning guidance, the HELAA does not consider smaller sites with potential for less than five dwellings (net). As a densely packed urban City, as noted in paragraph 5.2.1 of the HELAA Methodology document, Portsmouth has relatively few opportunities for larger scale development, therefore, smaller scale infilling (sites delivering 1 - 4 dwellings) and change of use developments have historically formed a significant part of the overall supply of housing land in Portsmouth. It was therefore, considered worthwhile to consider the extent to which smaller sites in Portsmouth have delivered housing in the past in order to consider an appropriate windfall allowance.

3.6.2 Table 8 below sets out housing completions by size (1-4, 5-9, and 10 or more dwellings) over the period 2006 - 2022, taken from Table 5 of the HELAA Methodology document.

Table 8: Housing Development in Portsmouth 2006 - 2022 by scheme size
(Source: HCC LAMS)

Year	1-4 dwellings	5-9 dwellings	10 or more dwellings	Total
2006-2007	93	123	312	528
2007-2008	89	106	525	720
2008-2009	74	114	1129	1317
2009-2010	42	72	614	728
2010-2011	50	50	224	324
2011-2012	50	68	161	279
2012-2013	43	55	255	353
2013-2014	34	22	169	225
2014-2015	34	29	348	411
2015-2016	56	63	321	440
2016-2017	45	45	304	394
2017-2018	61	38	312	411
2018-2019	48	25	133	206
2019-2020	46	57	65	168
2020-2021	63	41	181	285
2021-2022	36	29	94	159
Total	864	937	5147	6948

- 3.6.3 As can be seen can be seen from Table 8 above, small sites (1 to 4 dwellings) have comprised 864 (or 12%) of the total delivery of dwellings in Portsmouth from 2006 - 2022. This is an average of 54 new dwellings per year. When considering long-term delivery of housing it is best practice to base future estimates on long-term trends, unless there is clear evidence otherwise.
- 3.6.4 The average for small sites (1 to 4 dwellings) in the first five-year period was 70 homes per annum, which is considerably higher than both the second and third five years periods, which delivered 43 and 52 homes per annum respectively. On balance, it was thought that taking the fifteen-year average of the data available provided the most robust approach for small site windfalls. It was therefore, considered that, an estimate of 54 dwellings per annum delivered through small sites windfall represented a prudent estimate of delivery going forward, but one which was justifiable.
- 3.6.5 There was a small supply which had already come forward in the plan period for small site windfalls by way of completions of sites of less than 5 units. The data from this is shown in Table 9 below (this does not include HMO completions or student accommodation development):

Table 9 C3 Completions from sites with capacity of less than 5 dwellings 2020-2023

Year	C3 completions from sites with capacity of less than 5 dwellings
2020/21	61
2021/22	36
2022/23	-8
Total	89

3.6.6 Taking the above data together gave a projected supply of housing from small windfall sites (sites with capacity of less than 5 dwellings) of **1,007 dwellings**. This was made up of the total net completions of small sites from 2020/21 - 2022/23 (89 dwellings) and the projected supply arising from small sites windfall throughout the plan period (54 dwellings x 17 years = 918).

3.6.7 The inclusion of windfall sites within the anticipated housing supply is consistent with national policy. As noted in paragraph 70(a) of the NPPF, local planning authorities should support the development of windfall sites through their policies and decisions.

3.7 Equivalent contribution from HMO windfalls

3.7.1 HMOs have become a key part of housing delivery within the City in recent years, meeting the needs of those that require a more affordable market housing option. According to the 2022/23 AMR, there were over 4,000 active HMOs in Portsmouth at that time. The Council anticipates that the demand for HMO accommodation will continue in the City for the foreseeable future, and so it was considered prudent to include them in the City's supply as an HMO windfall allowance. The HELAA Methodology document provides the rationale for the expected contribution from HMOs, but this is also detailed below.

3.7.2 Only those HMO completions which involve the loss of a C3 residential dwelling are currently monitored. Whilst monitoring picks up a proportion of completed new HMO development, existing HMOs which are enlarged to provide more bedrooms are not included in the completions data due to limitations in identifying completion of HMO development on the ground (it is not generally possible to definitively identify HMOs or the number of rooms within them from looking at them from the street). Completions data, therefore, excludes a large amount of HMO development, so permissions data was used instead as this is a more comprehensive and robust dataset. Table 10 below sets out the HMO permissions data for the five year period 2018/19 - 2022/23. HMOs are converted to C3 dwelling equivalent on a 1 dwelling: 1.8 bedspaces ratio, i.e. 1.8 HMO bed spaces are equivalent to 1 C3 dwelling.

Table 10: HMO permissions and their C3 equivalent since 1 April 2018

Monitoring Year	Net HMO Beds Permitted	C3 Equivalent	C3 Losses due to HMOs	Total C3
2018/2019	164	91	26	65
2019/2020	66	37	19	18
2020/2021	69	38	9	29
2021/2022	147	82	31	51
2022/2023	54	30	8	22
Total	500	278	98	185

3.7.3 As can be seen in Table 10 above, HMOs equivalent to 185 C3 dwellings (based on the ratio of 1:1.8), or an average of 37 dwellings a year, have been permitted since 1 April 2018. A total of 102 equivalent dwellings have been permitted for HMOs in the plan period so far (2020/2021 - 2022/23). Based on the data above, a total of **731 equivalent dwellings** were considered likely to be delivered over the plan period, this is made up of 102 equivalent dwellings having been granted permission so far in the plan period, plus a further 629 equivalent dwellings predicted for the remainder of the plan period (37 dwellings x 17).

3.7.4 Although permissions data was used here rather than completions data, a non-implementation discount was not applied. Due to a high rate of delivery of HMO permissions it was not considered necessary to apply a non-implementation discount.

3.8 Equivalent contribution from C2 accommodation completions

3.8.1 The anticipated contribution from C2 student accommodation is already accounted for in the net completions (sites with capacity of 5 or more dwellings) 2020 - 23, and Permissions outstanding as of 31 March 2023. No windfall allowance is suggested for C2 student accommodation because, as noted in paragraph 5.1.5 of the HELAA, there is a lack of an identifiable trend to indicate that student accommodation will be a reliable and consistent supply of housing land in future. However, in terms of other (non-student) C2 development, Table 11 below sets out the supply so far in the plan period. The C3 dwellings equivalent figures are shown on a 1 dwelling: 1.8 bedspaces basis, i.e. 1.8 C2 bedspaces is equivalent to 1 C3 dwelling.

Table 11: C2 (non-student) development completions 2020/21 - 2022/2023

Year of completion	Planning ref.	Address	Description	Equivalent no. of C3 dwellings
2020/21	15/00244/FUL	Myfanwy House, 14 - 16 Magdala Road	14-bed elderly care home	7.77
2021/22	N/A	N/A	N/A	0
2022/23	19/01322/FUL	Forest Lodge, Locksway Road	66-bed adult residential care home	36.66
			TOTAL	44 (rounded down)

- 3.8.2 As can be seen from Table 11 above, the contribution from non-student C2 development to the Council's land supply is small. It is also difficult to predict what future non-student C2 development might take place, therefore, it was not considered appropriate to include a windfall allowance for this type of development. However, the completions from non-student C2 development since the start of the plan period were considered worth including. The supply from non-student C2 accommodation completions from the start of the plan period was **44 dwellings**.

3.9 Conclusions on Housing Supply and Available Land

- 3.9.1 Taking into account all of the elements of supply and available land discussed above, it was found that the total number of homes which could be delivered in Portsmouth over the Plan period was **13,603**. This is summarised below in Table 12, which is largely based on Table 6.1 from the emerging Local Plan but with minor alterations to exclude issues not covered in this background paper until later sections ('Target for new homes in Portsmouth 2020 - 2040' in Table 6.1 shown as 'Total' here, and Duty to Cooperate element excluded).

Table 12: Sources of new homes in Portsmouth

Source		No of Dwellings (net) (in plan period)
Net completions (sites with capacity of 5 or more dwellings) 2020-23 (A)		305
Permissions outstanding as of 31 March 2023 (net) (A) (B)		1,353
o Less 'Non-implementation discount' (15%)		(203)
Strategic sites (7,155):	City Centre	4,158
	St James' and Langstone Campus	417
	Tipner West & Horsea Island (C)	814
	Tipner East	1,056
	Fratton Park & Pompey Centre	710
Allocations (1,511):	Port Solent	500
	St John's College	212
	Fraser Range	134
	The News Centre, Hilsea	100
	Somers Orchard, Somerstown	565
Sites identified from 2023 HELAA: (A)	Small/medium sites <1ha with capacity for 5 or more dwellings	1,543
	Sites >1ha with capacity for 5 or more dwellings	457
	- Less 'Non-implementation discount' (15%)	(300)
Small sites windfall (sites with capacity of <5 dwellings) (D)		1,007
Equivalent contribution from HMOs (E)		731
Equivalent contribution from C2 accommodation completions (F)		44
Total		13,603
Footnotes:		

- A. Includes equivalent dwellings from student accommodation development and C3 losses to HMOs, but excludes gains from HMO gross completions.
- B. Comprising of permissions arising from City Centre sites, previous HELAA sites, and other non-HELAA sites; does not include HMO permissions, which are accounted for in (E). Includes dwellings from student accommodation developments.
- C. The range allocated for Tipner West & Horsea Island is 814-1,250 homes and the lowest figure of the range is fed into the housing target. The lower number provides the minimum number of homes required as part of the City Deal whilst the upper number provides certainty for the HRA in terms of impact on the integrity of the national and internationally designated sites.
- D. Including net completions 2020/21-2022/23; does not include HMO completions or student accommodation development.
- E. Including net permissions 2020/21-2022/23: the ratio applied is 1.8 bedrooms to 1 C3 dwelling.
- F. Including net completions 2020/21-2022/23; the ratio applied is 1.8 bedrooms to 1 C3 dwellings. Does not include student accommodation development.

3.9.2 As can be seen from Table 12 above, **the total number of homes which could be delivered in the plan period was 13,603, or 680 dwellings per annum**. This is below the standard method figure for housing need of 17,980 or 899 dwellings per annum.

4. Housing Density

4.1 Introduction

- 4.1.1 Having established that the standard method figure could not be achieved, methods of how to potentially increase housing delivery were then considered. One way of increasing the level of housing delivered is to consider increasing density for new developments. This section sets out the rationale and supporting evidence for the approach to residential density standards in the emerging Local Plan, which resulted in the inclusion of Policy PLP21: Residential Density. This includes consideration of monitoring data and the Urban Characterisation Study⁷ (March, 2011). This replaces the Housing Density Background Paper (2021). Increasing densities was tested through city-wide spatial options for housing growth in the Sustainability Appraisal (SA). The approach set out in this background paper is what has resulted after the options in the SA had been tested. Density has obvious links with the delivery of tall buildings, which is covered in criterion 7 of core policy PLP1: Design, which covers how applications for tall buildings should be designed, and the associated Supplementary Planning Document.

4.2 National Policy Context

- 4.2.1 Paragraph 129 of the NPPF notes that:

'Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for City and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;*
 - b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and*
 - c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).'*
- 4.2.2 Paragraph 130 of the NPPF indicates that, in applying paragraphs 129a) and b) to existing urban areas 'significant uplifts in the average density of residential development

⁷ Portsmouth City Council (March 2011) *Urban Characterisation Study*
<https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/development-and-planning-urban-characterisation-study.pdf>

may be inappropriate if the resulting built form would be wholly out of character with the existing area. It goes on to suggest that in such circumstances, where significant increases in density are proposed, this should be evidenced by an authority-wide design code.

4.3 Current approach to housing density in adopted Portsmouth Plan (2012)

- 4.3.1 Policy PCS21 of the adopted Portsmouth Plan (2012) provides minimum density standards that residential development in the City should aim to achieve. The policy encourages high density development in areas with good accessibility to public transport links, which are close to local facilities, and have been identified for intensification. Outside of these specified, high-density areas, a lower minimum density standard is applied. The policy sets two different density levels: the higher density area is required to provide a minimum of 100 dwellings per hectare (dph), outside of the higher density area the requirement is a minimum of 40 dph. Figure 2 below sets out policy PCS21.

Figure 2: Extract of policy PCS21 from the Portsmouth Plan (2012)

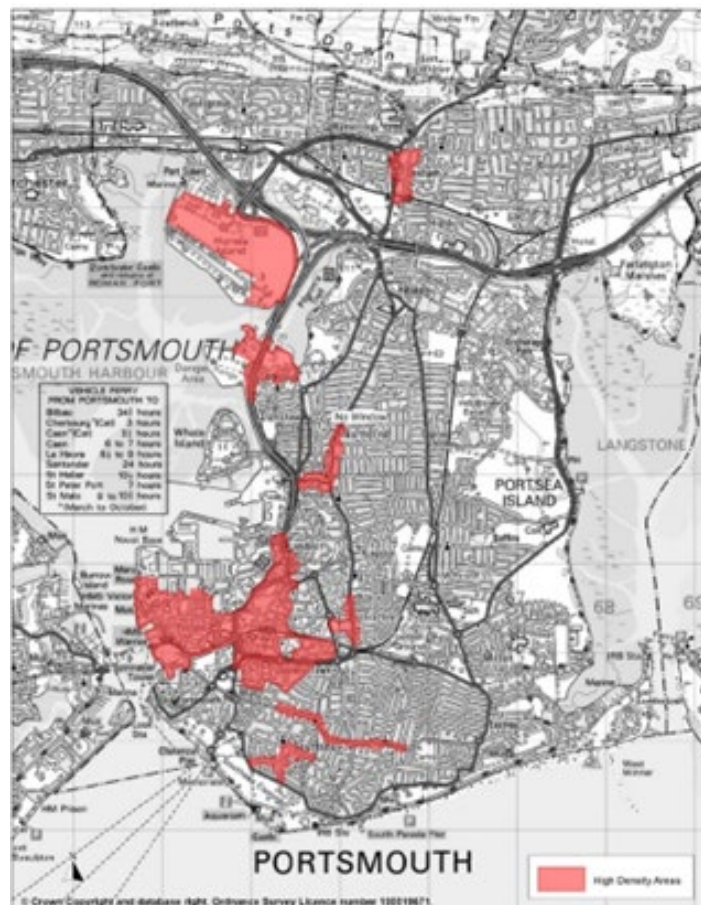
PCS21 housing density

High density housing development will be encouraged in areas with very good public transport links which are close to local facilities and have been identified for intensification. Housing density development on site should be a minimum of 100dph in the following areas:

- City Centre
- Cosham District Centre
- Fratton District Centre
- Southsea Town Centre
- Albert Road/Elm Grove District Centre
- North End District Centre
- Port Solent
- Tipner
- Somerstown and North Southsea

Outside of these areas, housing density should be no less than 40dph.

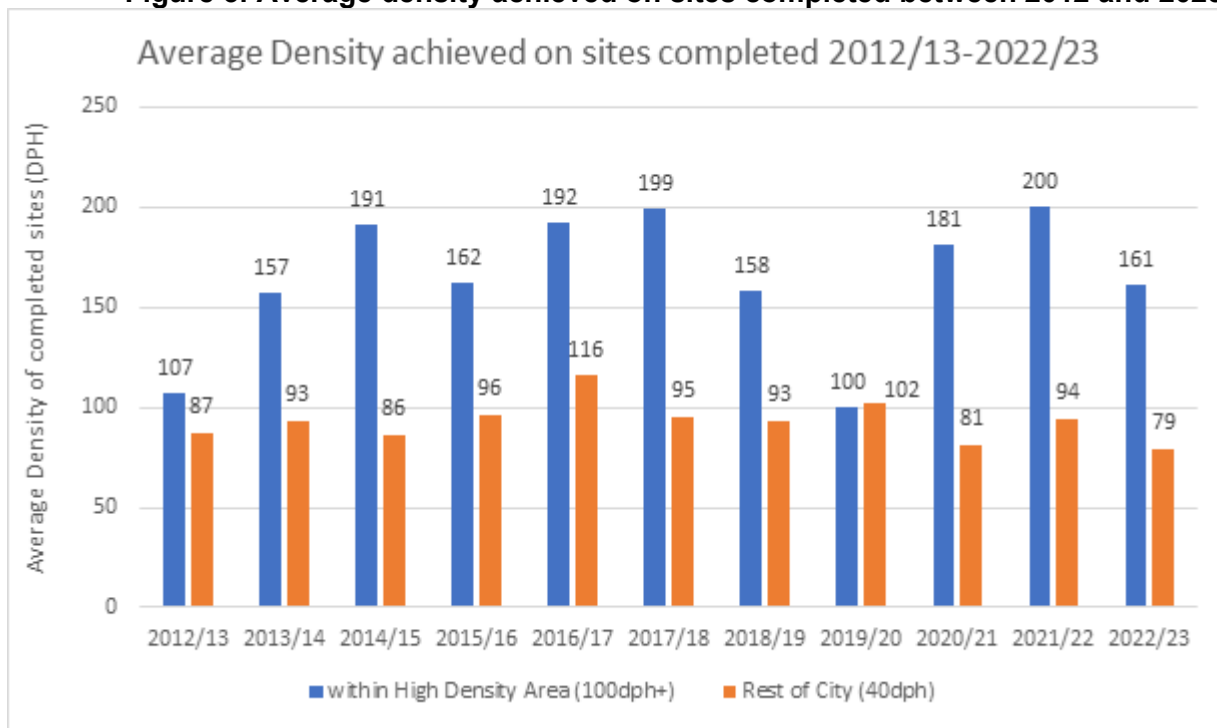
The council recognises that appropriate housing densities depend on various factors. The rationale for developing at different density levels to those outlined above should be made by the developer in an accompanying design and access statement.



4.4 Past housing densities

- 4.4.1 The density achieved on completed schemes is collected by HCC on an annual basis and provides a way of monitoring compliance of delivery against adopted policy PCS21. The densities recorded through annual monitoring are calculated by dividing the number of dwellings completed by the total site area. Therefore, they are on a gross area basis rather than net developable area basis.
- 4.4.2 Between 2012/13 and 2022/23 the completions monitoring data shows that within the areas identified for high density development by policy PCS21, schemes have been built at an average of 165 dph. During the same period, completed schemes in the rest of the City achieved an average density of 93 dph. These average densities have varied each year, however as Figure 3 below shows, for each reporting year the average densities achieved have met or exceeded the minimum level of required by policy PCS21.

Figure 3: Average density achieved on sites completed between 2012 and 2023

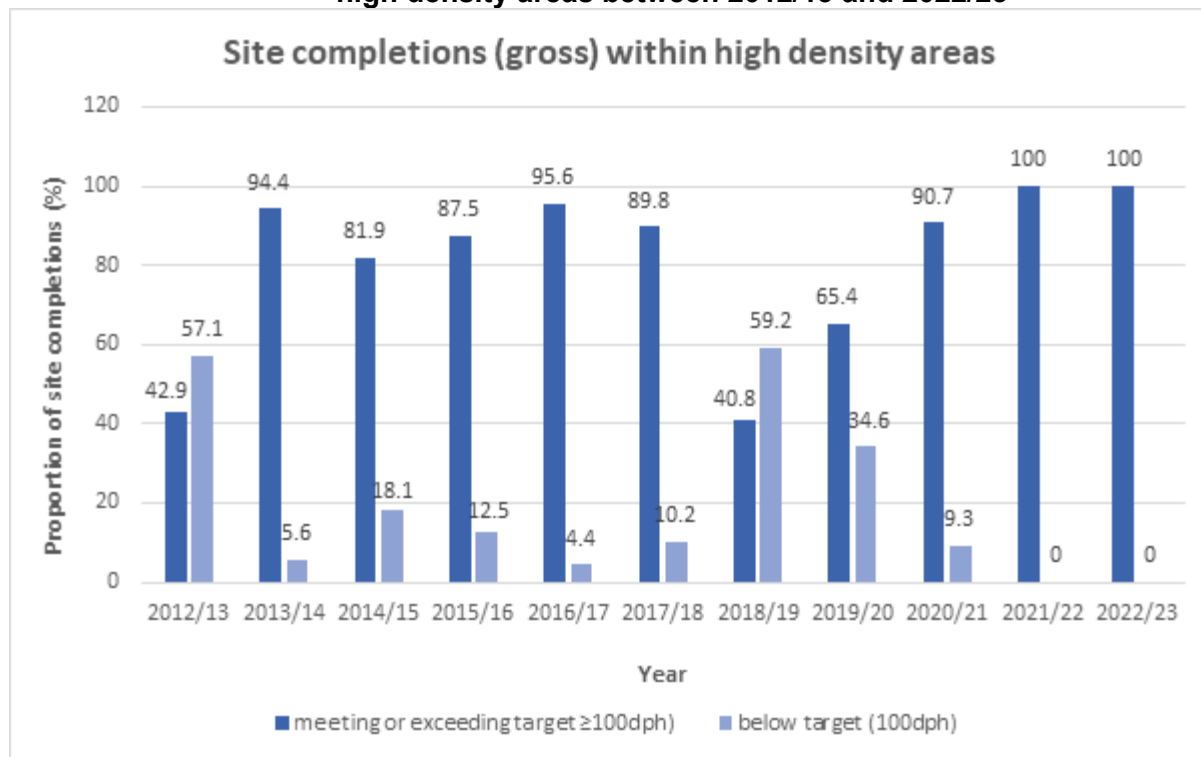


- 4.4.3 The data considering average densities achieved is helpful for understanding the overall picture across the City. However, it is acknowledged that each site's context and characteristics can influence the density that has been possible to achieve, so the next section considers completions, broken down by location (within and outside high density areas).

Completions within high density areas

- 4.4.4 The adopted Portsmouth Plan previously identified nine specific areas intended for intensification, developments in these areas are required to deliver a minimum of 100 dph. The nine areas vary in size and were selected based on their proximity to high frequency public transport routes and local facilities. Figure 4 below shows the site completions meeting or exceeding the 100 dph target within high density areas.

Figure 4: Site completions (gross) meeting or exceeding 100 dph target within high density areas between 2012/13 and 2022/23

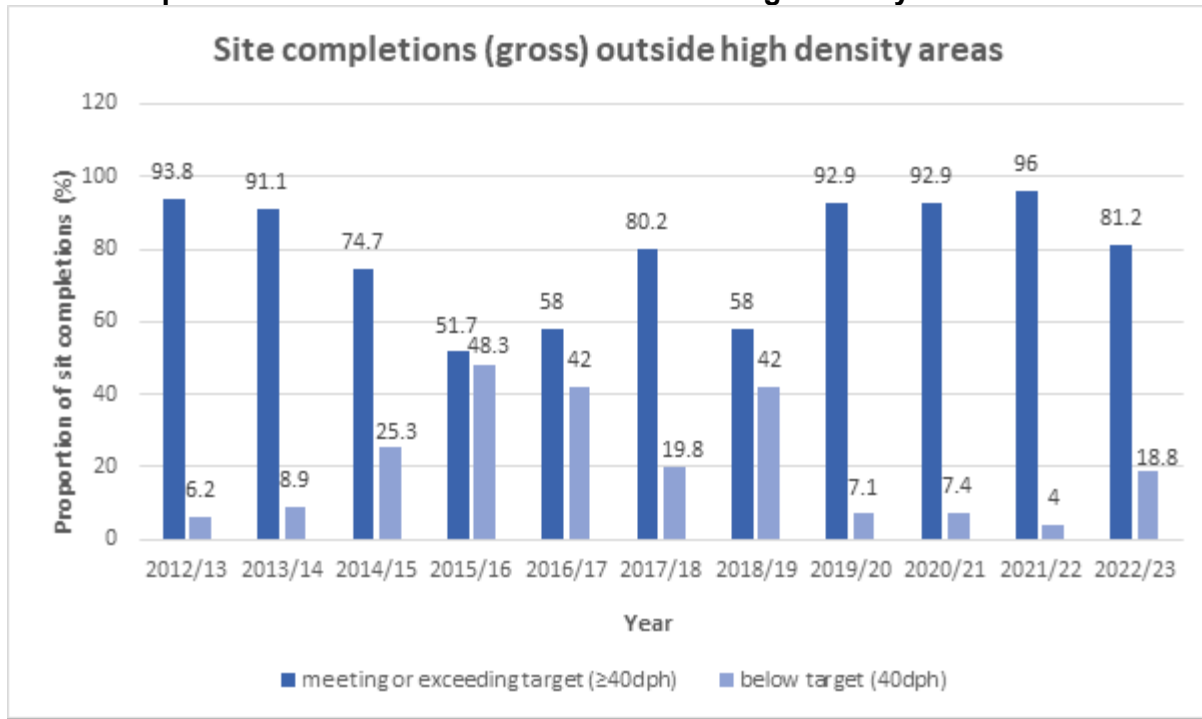


- 4.4.5 Within the defined high density areas, the mean average density figure of 165 dph achieved on sites completed between 2012/13 and 2022/23 was boosted by the majority of schemes meeting or exceeding the 100 dph target. During this period 69% of schemes delivered at or above the required 100 dph, whereas 31% of schemes failed to reach the 100 dph target. Specific reasons for failing to meet the density levels of PCS21 were not supplied in all cases. However, factors such as the need to reduce density to accord with the existing neighbourhood characteristics and/or due to the limitations and constraints of the site were acknowledged where appropriate.

Completions outside high density areas

- 4.4.6 Outside the identified high density areas, across the rest of the City, policy PCS21 states that housing sites should be delivered at a density of no less than 40 dph. The text supporting the policy notes that it is anticipated that housing development is likely to take place at high densities, therefore, 40 dph is a lower limit. Figure 5 shows the proportion of completed sites delivering 40 dph or more outside of the high density areas.

Figure 5: Proportion of completed sites delivering 40 dph or more on sites completed between 2012 and 2020 outside of high density areas



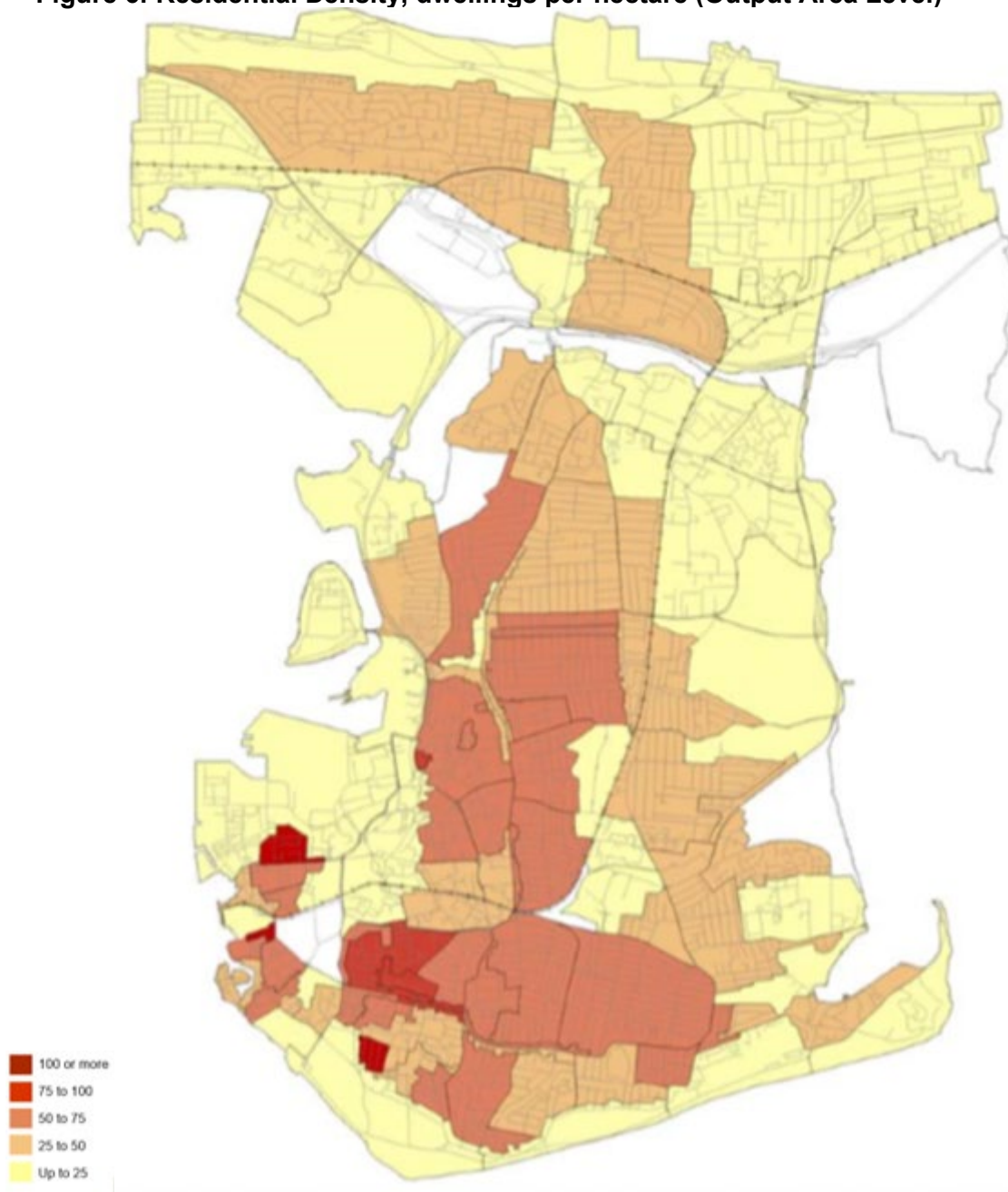
4.4.7 Between 2012/13 and 2022/23 the average density achieved across all sites outside of the high density areas was 93 dph, more than double the required minimum of 40 dph. Despite the high average densities achieved, there were still a number of schemes that failed to deliver the minimum target density. This ranged from around 11% of schemes in 2017 to around 34% of schemes in 2018. Despite this level of non-compliance, across the monitoring period 78% of schemes delivered or exceeded the 40 dph target.

4.4.8 Monitoring the effectiveness of Policy PCS21 shows that overall completed schemes are on average likely to meet and exceed the minimum densities prescribed in policy PCS21. In particular, a large proportion of schemes in the 40 dph areas of the City exceeded the existing target, suggesting that such areas of the City could easily accommodate density at a higher level within the existing built form.

4.5 Existing housing densities

4.5.1 Figure 6 below shows the average dwelling density for the monitoring output areas in the City taken from the Urban Characterisation Study (March, 2011). These average densities include everything in the output area including non-residential uses, roads etc. which is why areas with significant open space and non-residential uses have lower average densities. Individual residential buildings / blocks will have densities higher than those indicated.

Figure 6: Residential Density, dwellings per hectare (Output Area Level)



- 4.5.2 Although **Figure 6** is somewhat dated (2011), it is still relevant as it illustrates that some of the southern and central output areas already have housing densities which significantly exceed the broad 40 dph target set in the 2012 Local Plan.
- 4.5.3 The Urban Characterisation Study provides evidence on housing density which supplements evidence from monitoring data. The Urban Characterisation Study divides the City into a number of different character areas, indicating the existing density of each character area. Taking example densities of typical areas of the City showed that wide areas of the City were characterised by tight Victorian era terraces with gross dwelling densities of 50 to 75 dph. Whilst the physically constrained nature of the City means that

even the more 'suburban' edges of the City often have gross dwelling densities of between 25 to 50 dph. Figures 7, and 8 below are examples of the prevailing character areas in the City taken from the Urban Characterisation Study.

Figure 7 Existing High Density Areas (Extract from the Urban Characterisation Study)

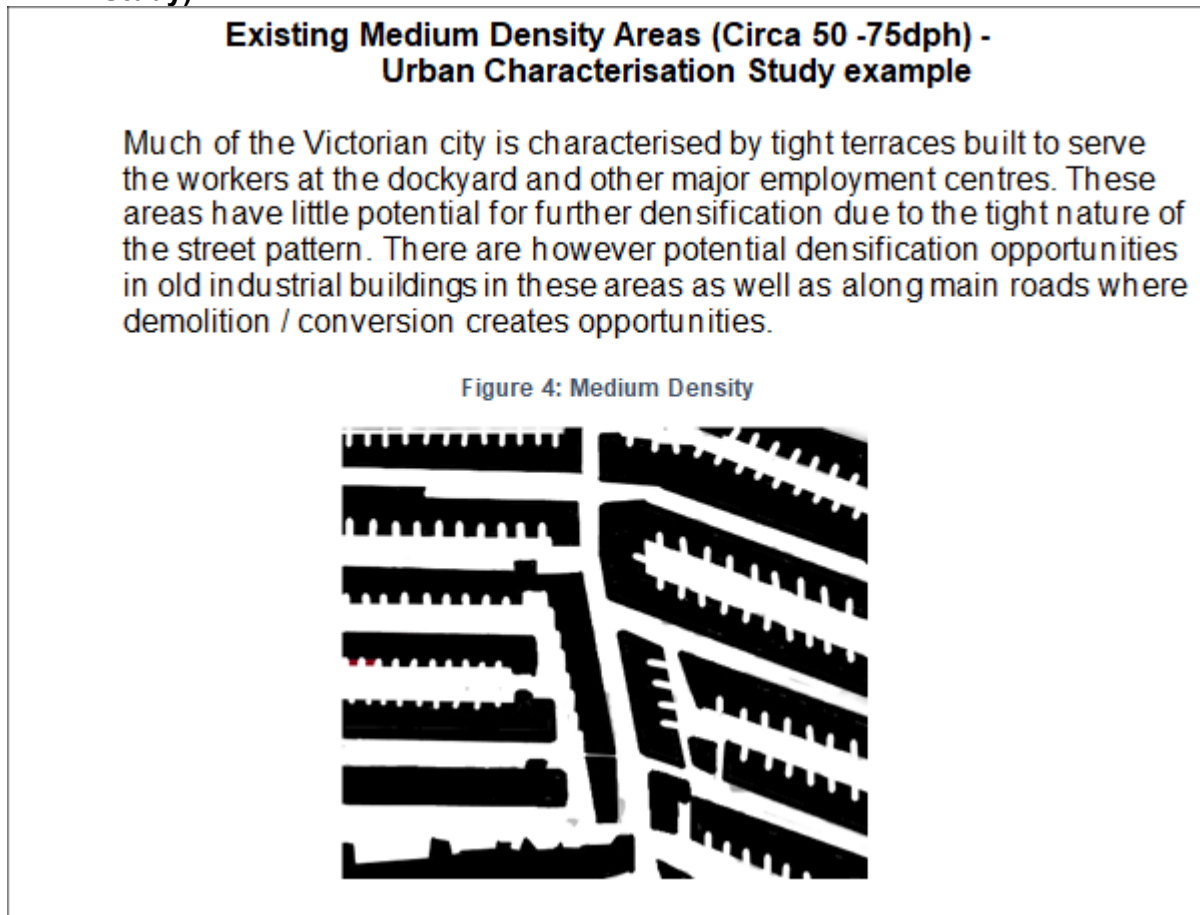
**Existing High Density Areas (Circa 100dph) -
Urban Characterisation Study example**

Within the city many of the highest density areas are mid-20th Century purpose built council stock. These areas often have a mix of very high and relatively low density development types in close proximity, with tower blocks, relatively dense maisonettes and middling height flats interspersed with lower density terraced blocks. Many of these areas were designed with interspersed open / ancillary space. Much of this space is integral to the character of the areas and is now mature and very valuable. However some of the spaces that were created are no longer used in the same way as designed and have potential for redevelopment for further intensive residential use. Good examples of these are washing yards and garage blocks which are either little used or not used and could be repurposed.

Figure 3: High Density



Figure 8 Existing Medium Density Areas (Extract from the Urban Characterisation Study)



4.6 Areas with potential for higher density development

- 4.6.1 The analysis of the existing density of the City area in the Urban Characterisation Study presented the foundations for identifying the areas of the City suitable for the highest density, i.e. predominately the area around the City Centre. Portsmouth's hierarchy of town and district centres also presents opportunities for densification due to existing or proposed high level of accessibility to sustainable transport networks and the identified opportunities for new development during the plan period in the Council's HELAA, e.g. Southsea Town Centre, and Cosham, North End, Fratton and Elm Grove/ Albert Road District Centres, as well as greater regeneration opportunities for significant new homes and other development identified at Tipner and the City Centre.

4.7 Proposed policy approach on housing density for Portsmouth

- 4.7.1 Given the physically constrained nature of Portsmouth, housing land supply is limited. Thus, it is imperative that the most efficient and effective use of any deliverable/developable land in the City is being made, in order to help meet as much of the identified need for new housing as possible. A site being brought forward for residential development should be optimised in its design (with density being a key

component informing the design response), whilst seeking to uplift the site's residential density and quantum where there are appropriate opportunities to do so.

4.7.2 Therefore, there are a number of planning objectives that can be met through applying density measures, including, but not limited to:

- Helping to make the efficient use of the City's limited land;
- Locating and providing higher density housing in sustainable locations so that residents can access amenities, services, infrastructure, and employment, whether these are located nearby or residents can readily access these elsewhere using nearby sustainable transport methods;
- Ensuring that what is delivered on site is appropriately designed, with regards to its own purpose as well as its context in relation to surrounding areas.

4.7.3 It was clear based on a review of data on how the Portsmouth Plan policy PCS21 was being implemented, that developments were not only already meeting the requirements of that policy, but were significantly exceeding them in many cases. It was therefore considered reasonable to propose a more ambitious density policy than PCS21 in the emerging Local Plan. To be in line with the national policy guidance, new density standards should be set at a level that is higher than the existing average densities of areas of the City.

4.7.4 New density targets were developed from the analysis of evidence set out in this section of the Housing Background Paper to determine an appropriate uplift, based on: existing built form, accessibility to key services and public transport, and identified schemes for significant new development. As well as maximising housing delivery, this approach was also considered likely to be helpful in supporting health and well-being through potentially encouraging more active travel (and reducing congestion) and directing higher growth to town centre locations.

4.7.5 To maximise density, proposals for the emerging Local Plan policy PLP21 divide the City area into three broad density zones with an appropriate minimum density, as follows:

High Density: Highly Accessible Areas

The City Centre and surrounds, Tipner and the town and district centres will form a new high-density zone with a minimum density for new development of 120 dph. These areas will be the focus of new high-density development within the City to help promote less car dependence, support retail and provide access to local employment.

Medium Density: Residential Core

The existing, denser residential core area will have a new ambitious target of minimum target of 80 dph that aims to ensure that there is uplift in prevailing densities across a significant area of the City.

Low Density: Suburban Edge

The more 'suburban' edge provides an opportunity for a wider range of types and tenures of residential development to be delivered within the City, and will therefore have a lower density target of 40 dph, as a minimum.

4.7.6 However, it is also recognised that 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. The emerging policy for the Local Plan therefore, contains such caveats which will allow site specific constraints to be taken into account, though the applicant will likely need to provide additional information to justify a lower density in these instances.

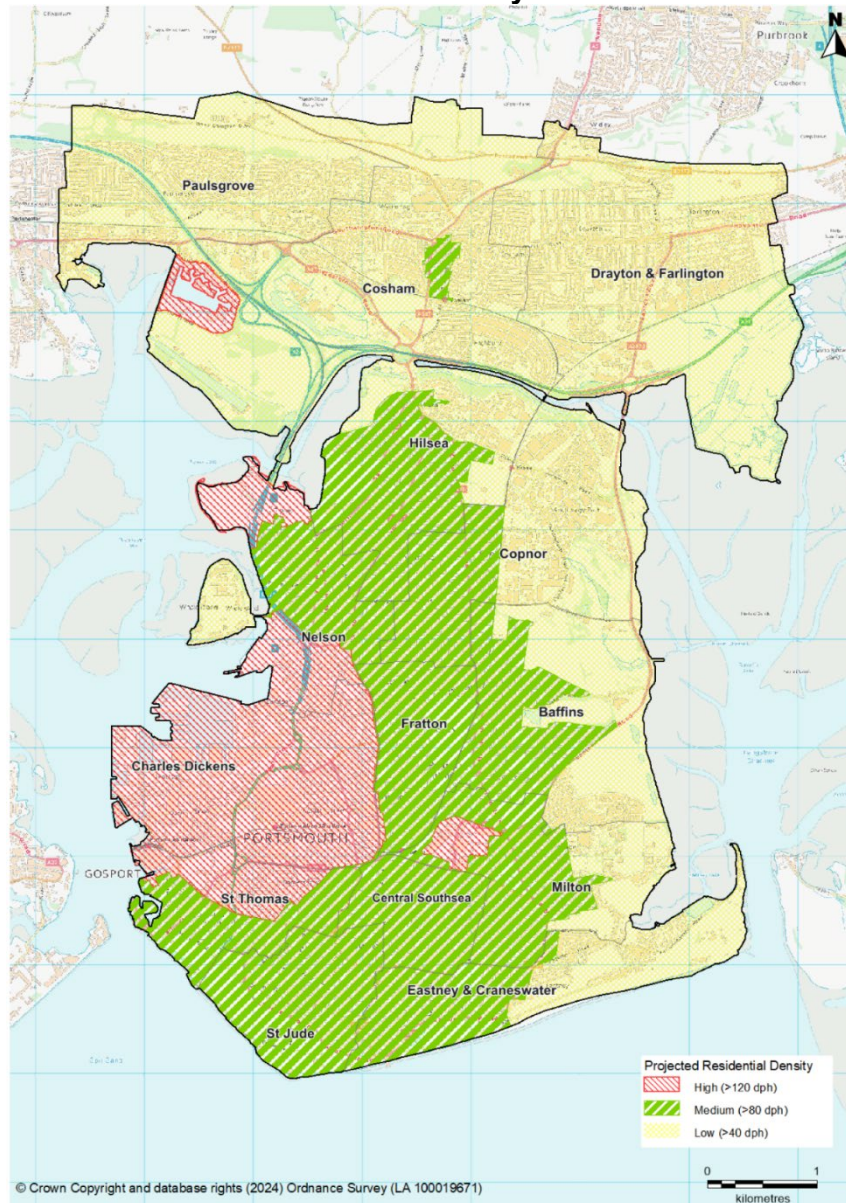
4.7.7 The resulting emerging policy is shown below:

Development Management Policy PLP21: Residential Density

- 1. Development proposals for residential development, including mixed-use schemes that have a residential element, will be permitted where the residential density is in accordance with the minimum density for its location, as shown on the Policies Map, as follows:**
 - **High density development of at least 120dph in areas of high accessibility;**
 - **Medium density development of at least 80dph across the City's core residential areas;**
 - **Lower density development of at least 40dph in the suburban edge.**
- 2. Where a proposed development has a lower residential density level to the thresholds above, the proposal must be supported by robust evidence and rationale that justifies the proposed density is appropriate and is responding positively to its context.**

4.7.8 Figure 9 below shows the different residential zones which will apply under policy PLP21: Residential Density.

Figure 9: Proposed residential zones in relation to Policy PLP21: Residential Density



- 4.7.9 The proposed Development Management Policy PLP21: Residential Density in the emerging Local Plan was drafted to density requirements at an ambitious level, with higher density requirements than existing adopted policy, with the aim of helping to increase housing supply in the City, whilst at the same time not adversely impacting on character.

5. Duty to Cooperate and Housing Numbers

5.1 Introduction

- 5.1.1 In this section, the Duty to Cooperate is considered in terms of housing numbers, and how this relates to Portsmouth's housing target. Full details of the Council's approach to the Duty to Cooperate is provided in the Council's Interim Duty to Cooperate Statement⁸. This section starts by considering the national policy context, followed by setting out the context for Duty to Cooperate discussions. Details of joint working with other members of the Partnership for South Hampshire are then provided, concluding with a section outlining what commitments other authorities have made so far to help meet Portsmouth's unmet housing needs.

5.2 National Policy Context and Legislation

- 5.2.1 In addition to meeting the local housing need figure, the NPPF requires that any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. At paragraph 67 the NPPF sets out that: *'Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.'*
- 5.2.2 The Localism Act 2011 requires local planning authorities to cooperate with neighbouring authorities on strategic matters including housing delivery (the "Duty to Cooperate"). This is expanded upon in the NPPF and national planning policy guidance, as a requirement for a Statement of Common Ground to address strategic cross-boundary issues including housing need.

5.3 Context for Duty to Cooperate discussions

- 5.3.1 Whilst the NPPF requires local authorities to consider how it can meet the unmet needs of its neighbours, as section 3 of this Housing Background Paper demonstrates, Portsmouth is unable to meet its own needs based on the standard method figure, and so is unable to meet the housing needs of other authorities. The starting point for Duty to Cooperate discussions was therefore to see if other authorities could meet some of Portsmouth's unmet need. Based on the standard method figure, the level of unmet need the Council was seeking to be met elsewhere was 4,377 dwellings over the plan period 2020 - 2040, or 219 dwellings per annum.

5.4 Partnership for South Hampshire

- 5.4.1 Portsmouth City Council is an active member of Partnership for South Hampshire (PFSH), which was originally formed in 2003 as the Partnership for Urban South

⁸ PCC (July 2024) *Interim Duty to Cooperate Statement: Supporting the Pre-Submission Portsmouth Local Plan* https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/Final_Interim_Duty_to_Cooperate_Statement_July_2024.pdf?appgwaf_jsc=4HRbnV9vJwErFlsBcH2gBQWWmxUoYV5YPPB3fHhKITE

Hampshire (PUSH). It is a partnership of district and unitary authorities, together with HCC and the New Forest National Park Authority, working together to support the sustainable growth of the South Hampshire sub-region. PfSH consists of the local authorities of: Portsmouth, Southampton, East Hampshire, Eastleigh, Fareham, Gosport, Havant, New Forest, Test Valley, Winchester, and the New Forest National Park, as well as HCC.

- 5.4.2 The Partnership has a strong track record in collaborative working to achieve common goals in South Hampshire. PfSH was heavily involved in the production of the sub-regional strategy for development that formed part of the South East Plan Regional Spatial Strategy. The ethos of collaborative cross boundary working continued in South Hampshire after the abolition of regional planning and the revocation of the South East Plan in 2013.
- 5.4.3 A number of Statements of Common Ground (SOCGs) have been produced by PfSH over the years. The last one was signed by Joint Committee in September 2023⁹. It sets out the key strategic cross-boundary planning issues including housing needs and the methodology and framework for the preparation of the new Spatial Position Statement published in December 2023. It is a snapshot of housing need and supply in the sub-region divided up between its constituent local authorities from 2022 - 2036. The overall deficit was estimated to be 14,351 homes at that time (including a deficit from Portsmouth). The SOCG states that the shortfall is best defined as need that is not yet planned for, rather than need that is definitively unmet. It states that the shortfall would diminish over time as local plan reviews get underway and emerging plans are progressed.
- 5.4.4 The SOCG identified six local planning authorities that are less likely/unlikely to meet their housing needs: New Forest District, New Forest National Park Authority, Southampton, Gosport, Portsmouth and Havant. It states that the PfSH authorities are taking a two-stage approach to addressing the needs of those authorities, including Portsmouth, that are unable to meet their housing needs in full. In the first stage, the following authorities are identified as more likely to be able to meet and potentially exceed their housing need: East Hampshire, Eastleigh, Fareham, Test Valley and Winchester. The precise contribution from each authority will be determined through their respective local plan processes.
- 5.4.5 In the longer term and in stage two, Broad Areas of Search for Growth identified in the Spatial Position Statement will be considered through Local Plans. These were identified by considering the combination of relative absence of strategic constraints, relative proximity to opportunities and services, and their scope in principle for good public and active travel connectivity. The broad areas would require further investigation and technical work to determine their suitability as specific locations for development, and to test their capacity, deliverability, infrastructure and mitigation needs to achieve allocations in Local Plans. A preliminary assessment suggests that the areas of search have a combined capacity for around 7,500 dwellings, subject to deliverability, infrastructure and mitigation.

⁹<http://www.push.gov.uk/wp-content/uploads/2023/09/ITEM9-1.pdf>

- 5.4.6 It should be noted that Portsmouth is not the only local planning authority in South Hampshire where growth is constrained. The sub-region is bounded by two national parks, an Area of Outstanding National Beauty, the coast/estuaries, a range of international, national and local biodiversity designations and it needs to accommodate land for biodiversity mitigation and net gain. It is already heavily built up in places, with areas of valued countryside often important in landscape terms or as settlement gaps protecting the identity of individual towns and villages. Some areas are less accessible by public transport. The SOCG states that the need to accommodate significantly more homes for people in the medium and longer term, including in the areas of search, will need to be carefully tested through local plans against all of these important characteristics to achieve the optimum solution.
- 5.4.7 The PfSH Spatial Position Statement¹⁰ was approved by Joint Committee in December 2023. It aims to provide guiding principles for local plans to help deliver sustainable development within South Hampshire. It should be noted that it is not an upper tier plan with which future local plans will need to conform. It does, however, help inform the preparation and strategic co-ordination of local plans under the duty to cooperate. Table 1 of the Spatial Position Statement compares housing need and supply along with shortfalls and surpluses for each local authority in PfSH as a snapshot in time. On this basis the latest shortfall is 11,771 dwellings (2023 - 2036). Several evidence based documents supporting the Spatial Position Statement were published at the same time including the Broad Areas of Growth Assessments.
- 5.4.8 The Spatial Position Statement retains the strategic principle of focusing growth on cities/urban areas first to maximise housing delivery within existing urban areas and identifies a number of existing strategic development locations in SPS7. It also identifies new Broad Areas of Search for Growth as follows:
- South-east/east of Eastleigh Town (Eastleigh)
 - Havant Town Centre (Havant)
 - Waterlooville Town Centre (Havant)
 - Southleigh (Havant)
 - East of Romsey (Test Valley)
 - South-west of Chandler's Ford (Test Valley)
 - East of Botley (Winchester).
- 5.4.9 The sites that fall within the broad areas of search will need to be tested through the local plan preparation process, including against other sites that may be available or promoted within individual local planning authority areas. The local plan process will also need to resolve the quantum and form of development on sites and the infrastructure that will need to be provided to support development and make it sustainable.

¹⁰ Partnership for South Hampshire (Dec 2023) *Partnership for South Hampshire Spatial Position Statement* <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.push.gov.uk%2Fwp-content%2Fuploads%2F2023%2F12%2FPfSH-Spatial-Position-Statement-6-December-2023.doc&wdOrigin=BROWSELINK>

5.5 Unmet housing needs to be met by other authorities

- 5.5.1 As part of PfSH, Portsmouth City Council has agreed with Fareham that they will deliver some of Portsmouth's unmet housing need. Agreement has also been reached with Winchester for them to meet some of Portsmouth's unmet housing need.
- 5.5.2 Fareham Borough Council has made a commitment in their adopted Local Plan (2023) to meet 800 dwellings of Portsmouth's unmet housing need. This reduces Portsmouth's unmet need from 4,377 dwellings over the plan period, to 3,577 dwellings.
- 5.5.3 Winchester City Council has also made a commitment to provide 30% of its residual unmet need housing allowance to Portsmouth. This commitment is set out in a SOCG submitted with Portsmouth's Local Plan, and is also part of Winchester's submitted Local Plan. However, unlike at Fareham where that Local Plan has been through examination and been adopted, Winchester's Local Plan was only submitted in November 2024, so has not yet been through examination. Until Winchester's Local Plan has been found sound and adopted, with a figure included to meet unmet need in Portsmouth, it is difficult to put as much weight on Winchester's commitment as can be put on Fareham's commitment.
- 5.5.4 The Local Plans of other PfSH authorities are still being progressed, and Portsmouth continues to work with them to try and secure further commitments to meet the remainder of Portsmouth's unmet needs.

6. Setting the Housing Target

- 6.0.1 Section 2 of this Housing Background Paper established that the housing need figure for Portsmouth was 899 dwellings per annum, a total of 17,980 over the plan period 2020 - 2040. However, section 3 stated that the most which could be accommodated through existing supply and available land was 680 dwellings per annum, a total of 13,603 dwellings over the plan period.
- 6.0.2 Given the findings of section 3 of this paper, Portsmouth City Council had little choice but to set a target of 680 dwellings per annum. This is a 'capacity-based' target based on the level of housing that can be realistically achieved within the Plan period having regard to Portsmouth's constraints, land availability and development capacity. Portsmouth is a physically compact city with many constraining factors including its wealth of nature and heritage designations, that limit options for development growth. The reality is that land availability and housing delivery in the City is a major challenge, which means that the Local Plan has an important role to play in balancing the wide range of competing development needs and the need to protect and enhance the quality of the environment, in order to plan for the long-term sustainable growth of the City. Despite this challenge, the Council has sought to leave 'no stone unturned' in robustly and positively identifying all sources of potential housing supply, whilst being pragmatic in its assessment of delivery from permitted sites and HELAA sites through the application of a 'non-implementation discount.' The Council has also set an ambitious policy on housing density to help maximise the potential of the sites which *are* available for development.
- 6.0.3 Whilst the housing requirement target does not meet the standard method housing need in full, it does meet and exceed the level of housing need generated by the job growth scenarios tested in the HEDNA in the range of 431 to 634 dwellings per annum, so it is not anticipated that the proposed housing target will lead to constrained economic growth.
- 6.0.4 The NPPF states that the outcome of the standard method is an advisory starting point for establishing a housing requirement. The City Council therefore considers that the housing target set in Policy PLP16 is both justified and consistent with Government policy.
- 6.0.5 Given that the emerging Local Plan's overall housing target is 13,603 dwellings, the identified small/medium size sites of less than 1ha (totalling 1,543 dwellings) exceeds the 10% requirement from the NPPF (para 70(a)), as 10% of 13,603 is 1,360.
- 6.0.6 A further contribution to the housing supply is being sought from neighbouring local authorities through the Duty to Cooperate, which is discussed in section 5 of this Housing Background Paper. A commitment to deliver 800 homes has been secured from Fareham, which have been allocated in the Fareham Local Plan (2023), and a further commitment is proposed to be met in Winchester. The Council will continue to work with other neighbouring authorities to seek contributions towards the remaining unmet need.

7. Five Year Housing Land Supply

7.1 Introduction

- 7.1.1 This section sets out the Council's five year housing land supply anticipated on adoption of the Portsmouth Local Plan in 2025 based on the housing target of 680 dwellings per annum.

7.2 National Policy Context

- 7.2.1 As part of identifying land for new homes, the NPPF (paragraph 69) sets out that planning policies should identify a supply of specific, deliverable sites for the five years following the intended date of adoption, with an appropriate buffer. The appropriate buffer to apply is explained in paragraph 77 of the NPPF which states that where there has been significant under delivery of housing over the previous three years (as measured against the Housing Delivery Test (HDT), where this indicates that delivery was below 85% of the housing requirement), the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period).
- 7.2.2 Paragraph 79 of the NPPF sets out the consequences for local planning authorities failing to meet the HDT over the previous three years. Where delivery falls below 95% of the requirement over the previous three years, the authority should prepare an action plan to assess the causes of under-deliver and to identify actions to increase delivery in future years. Where delivery falls below 85% of the requirement, the authority should include a buffer of 20% in addition to preparing an action plan. Finally, where delivery falls below 75% of the requirement, the presumption in favour of sustainable development applies, in addition to requirements for an action plan and a 20% buffer.
- 7.2.3 The PPG at paragraph 031 (Reference ID: 68-031-20190722) advises on how past shortfalls in housing completions against planned requirements can be addressed. It states that where shortfalls in completions have been identified against planned requirements, strategic policy-making authorities may consider what factors might have led to this and whether there are any measures they can take (either alone or with other authorities) which may counter the trend. It specifies that under-delivery may need to be considered where the plan being prepared is part way through its proposed plan period, and delivery falls below the housing requirement level set out in the emerging strategic policies for housing. Paragraph 031 of the PPG continues by stating that strategic policy-makers may need to consider recommendations from the local authority's action plan prepared as a result of past under-delivery based on the HDT. It also states that:

'The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process. [...] Where strategic policy-making authorities are unable to address past shortfalls over a 5 year period due to their scale, they may need to reconsider their approach to bringing land forward and the assumptions which they make. For example by considering developers' past performance on delivery; reducing the length of time a permission is valid; re-prioritising reserve sites which are 'ready to go'; delivering development directly

or through arms' length organisations; or sub-dividing major sites where appropriate, and where it can be demonstrated that this would not be detrimental to the quality or deliverability of a scheme.'

7.3 Portsmouth's anticipated Five Year Housing Land Supply on adoption of the Local Plan

- 7.3.1 Portsmouth's Local Plan is anticipated to be adopted during 2025. As the most recent Housing Delivery Test measurement (for 2022, published on 19 December 2023) shows that Portsmouth's result was 38%, this means that a 20% buffer should be used for the purposes of setting the five year housing land supply requirement, and the Council has had to prepare a Housing Delivery Test Action Plan¹¹. Table 13 below shows the calculation of Portsmouth's anticipated five year housing land supply on adoption of the Portsmouth Local Plan against the housing requirement of 680 dwellings per annum.

Table 13: Five year housing land supply position from the year of anticipated adoption of the Portsmouth Local Plan

Five-year Housing Land Supply for 2025/26 - 2029/30	How calculated	Number of Dwellings
Outstanding permissions		807
○ Less 'non-implementation discount' (15%)		(121)
Anticipated delivery from strategic sites and site allocations in adopted and emerging Local Plan		2,947
Other identified deliverable housing sites		695
- Less non-implementation discount (15%)		(104)
Small sites (with capacity for <5 dwellings) windfall		270
Houses of Multiple Occupation windfall contribution		185
Total estimated supply for 2023/24 - 2027/28		4,679
Housing Target as set in the PLP (per year)	680 x 5	3,400
Plus 20% buffer due to under delivery against the Housing Delivery Test	20% of 3,400	680
Total requirement including buffer	3,400 + 680	4,080
Annualised requirement including buffer (dwellings per annum)	4,080 / 5	816
Surplus / shortfall against identified need for this period	4,679 - 4,080	+599
Housing land supply for 2025/26 - 2029/30	4,679 / 816	5.73 years

- 7.3.2 Table 13 above demonstrates that there is a deliverable housing supply of 5.73 years identified in the Local Plan against the total five year housing land supply requirement (including a buffer of 20%) from the anticipated year of adoption in 2025/26.

¹¹ Portsmouth City Council (Oct 2024) *Housing Delivery Test Action Plan 2023-2024*
<https://www.portsmouth.gov.uk/wp-content/uploads/2024/10/Portsmouth-City-Council-Housing-Delivery-Test-Action-Plan-2023-2024-FINAL-accessible-PDF.pdf>

7.4 Addressing an Historic Shortfall

- 7.4.1 If any historic shortfalls have occurred, these should be added to the '*next five year period*' according to the PPG, which is assumed to mean years 6 - 10 of the Plan). The emerging Local Plan will already be part-way through its plan period on adoption, as the plan period starts in monitoring year 2020/21, and adoption is anticipated in monitoring year 2025/26. Completions over the period 2020/21 - 2022/23 amount to 540 dwellings (made up of a total of 305 dwellings from sites of 5 or more dwellings for C3 units and equivalent C2 student accommodation, 89 units from C3 completions on sites with a capacity of less than 5 dwellings, 102 from HMO permissions, and 44 equivalent units from C2 non-student completions). Over that period, the target to be applied in line with the emerging Local Plan would be 680 dwellings per annum, which equates to 2,040 dwellings (680 x 3). This results in a shortfall of 1,500 dwellings over the first three years of the plan. A 20% buffer should also in theory be applied on top of this.
- 7.4.2 There were some temporary constraints on land supply which applied during the years of the historic shortfall, which included the Covid-19 pandemic, (with associated disruption and well documented increases to build costs, and changing economic market), and nutrient neutrality (which required a mitigation strategy to be established before development could be permitted). The impacts of the pandemic have now largely subsided (though build costs do remain high), and the Council now has a Nutrient Neutral Mitigation Strategy¹² which it adopted in 2022 that provides a robust framework through which planning applications can achieve nutrient neutrality. This strategy has been important to help unlock more sites for development.
- 7.4.3 Whilst the PPG sets out various ways in which a historic shortfall can be dealt with, given the way the housing target of 680 has been derived, most of these are unlikely to significantly increase housing supply in Portsmouth. It would make no difference to the Council's land supply if the Council took into account past performance from specific developers, or reduced the amount of time permissions were valid, and there are no reserve sites 'ready to go'. The Council does what it can to deliver development directly, and a number of Council-owned sites have been included as deliverable/developable sites in the HELAA, but development of Council-owned land by itself is not going to solve the housing supply issue in Portsmouth. Likewise, sub-division of major sites is unlikely to help matters. The target of 680 dwellings per annum, a total of 13,603 dwellings set over the plan period is already set as high as can be realistically achieved due to this being a capacity-based figure. In other words, there are not considered to be any more sources of housing supply that could be further identified as deliverable or developable over the Plan period, so there is no way of addressing the historic shortfall. Proposed allocations are coming forwards as quickly as reasonably possible in the plan period, and cannot be brought forward. In any case, the 13,603 dwelling target figure for the plan period is anticipated to be delivered in full, even though the annual target has not been achieved in the first three years of the plan period, so there is no real need to try and account for a notional shortfall arising from the first three years of the plan period or indeed to add a 20% buffer to this.

¹² https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/nitrate-mitigation-strategy/?appgw_azwaf_jsc= IA72AM1pDdh35RmAA3BUbswsv7yZj644bGhAAOLAz8

- 7.4.4 As set out in this paper, and in the Duty to Cooperate Statement, the Council has asked for assistance from other authorities to meet its unmet need for housing. Beyond this it is not thought that the Council has any other options open to it. The best solution to help improve the Council's housing supply is for the emerging Local Plan to be adopted.

8. Housing Trajectory

8.1 Introduction

- 8.1.1 This section provides Portsmouth's housing supply trajectory for the period from 2020 to 2040.

8.2 National Policy Context

- 8.2.1 The NPPF sets out guidance on maintaining the supply and delivery of housing. This includes requiring that strategic policies include a trajectory showing the expected rate of housing delivery over the plan period and consideration of the anticipated rate of housing development for specific sites (paragraph 75).

8.3 Trajectory

- 8.3.1 Table 12: Sources of New Homes in section 3 of this Housing Background Paper outlines the overall position of the emerging Local Plan housing supply for the period 2020 - 2040. This can be further broken down by category of site on an annual basis to give an indication of projected yearly housing delivery rates arising from all identified sources, which is then used as a basis for the overall trajectory of housing supply for the plan period. Appendix 1 of this paper provides the full trajectory, Table 14 below provides a summary reflecting the five-year phasing used throughout the plan period, making up the total housing supply figure of 13,603 dwellings.

Table 14 Summary of Housing Trajectory in five-year phases

Timeframe	2020/21 - 2024/25	2025/26 - 2029/30	2030/31 - 2034/35	2035/36 - 2039/40
	1708	4679	5434	1782

- 8.3.2 As can be seen from Table 14 above, whilst annual delivery rates are expected to start slowly in the first five year period, they increase in the second five year period (which is when the plan is likely to be adopted), peaking in the third five year period, dropping down again in the final five year period.
- 8.3.3 The trajectory shown in Appendix 1 illustrates how the target for each year of the plan period relates to the overall annualised housing target of 680 dwellings per annum. For the historical period 2020/21 - 2022/23, before the plan has been adopted, there is an annual, as well as cumulative shortfall against 680 dwellings target, but this is made up for later in the plan period when there is a surplus.
- 8.3.4 The trajectory is based on the best available information at the time of writing this paper, however, this is just one possible scenario of how housing delivery will unfold for all the identified sources of supply included in the emerging Local Plan. Annual monitoring of housing delivery will be required to assess actual delivery against the housing requirement target set by the emerging Local Plan to ascertain the extent to which the trajectory is being achieved.

9. The Future National Planning Policy Context for Housing

- 9.0.1 On 30 July 2024 a new draft NPPF was released for consultation. Under the transitional arrangements set out in the draft NPPF (2024) Annex 1, para 226 c), the Portsmouth Local Plan will proceed to examination under the December 2023 NPPF, as the Portsmouth Local Plan has been submitted on or before the publication date of the new NPPF plus one month. At the time of writing this Housing Background Paper, the new NPPF had yet to be published.
- 9.0.2 The NPPF consultation (2024) includes a new and significantly different method of calculation for the standard method, shifting from a population-based approach to a stock-based approach. Under the proposed new standard method, Portsmouth's housing need would be 1,098 new homes per annum. There is a difference of 418 dwellings between the housing requirement of 680 homes per annum set in the emerging Local Plan Policy PLP16: Housing Target, and the local housing need figure defined under the draft proposed new standard methodology of 1,098 dwellings. As the difference is more than 200 dwellings, the City Council therefore, commits to commence plan making under the new system at the earliest opportunity to address the shortfall in housing need, in line with the transitional arrangements for the new NPPF.
- 9.0.3 It will be for future Local Plans to prepare a further assessment of the City's housing land supply and associated housing target against the new NPPF and its associated increased housing need figure. The draft NPPF does not change the analysis set out in this paper and in the Council's wider evidence base, that justify policy PLP16 in using a capacity-based housing target of 680 new homes per annum due to constraints that limit the supply of land for housing in Portsmouth.

Appendix 1 Housing Trajectory

Housing Supply 2020/21 - 2039/40							5YHLS														
	Capacity estimate 2020-40	2020/21	2021/22	2022/23	2023/24	2024/25	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 (sites with capacity of 5 or more dwellings) 2020/21-2022/23 (1)	305	253	99	-47	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Permissions outstanding as at 31 March 2023																					
PLP6 City Centre sites with Permission as at 31 March 2023 (Net) (1)	299	0	0	0	9	54	236	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Identified HELAA sites with Permission as at 31 March 2023 (Net) (1)	690	0	0	0	113	113	113	113	113	25	25	25	25	25	0	0	0	0	0	0	0
Non-HELAA sites with Permission as at 31 March 2023 (Net) (2)	364	0	0	0	91	91	91	91	0	0	0	0	0	0	0	0	0	0	0	0	0
Less Non-implementation Discount (15%)	-203	0	0	0	-32	-39	-66	-31	-17	-4	-4	-4	-4	-4	0	0	0	0	0	0	0
Strategic sites	7155	0	0	0	0	404	404	404	405	467	854	854	814	814	784	175	175	175	175	125	125
Allocations	1511	0	0	0	8	8	8	8	8	194	194	194	194	194	100	100	100	100	100	0	0
Sites identified from 2023 HELAA	2000	0	0	0	94	94	94	94	94	206	206	206	206	206	99	99	99	99	99	0	0
Small/medium sites <1ha with capacity for 5 or more dwellings	1543																				
Sites >1ha with capacity for 5 or more dwellings	457																				
Less Non-implementation Discount (15%)	-300	0	0	0	-14	-14	-14	-14	-14	-31	-31	-31	-31	-31	-15	-15	-15	-15	-15	0	0
Windfall (<5 units) including net completions 2020/21-22/23	1007	61	36	-8	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54	54
HMO contribution including net permissions 2020/21-22/23	731	29	51	22	37	37	37	37	37	37	37	37	37	37	37	37	37	37	37	37	37
C2 contribution (gross completions 2020/21-22/23)	44	7	0	37	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	13603	350	186	4	360	803	957	757	680	949	1336	1336	1296	1296	1059	450	450	450	450	216	216
DTC - Fareham Borough Council	800	0	0	0	53	53	53	53	53	53	53	53	53	53	53	53	53	53	53	0	0
Total with max DtC	14403	350	186	4	413	856	1011	810	734	1003	1389	1389	1349	1349	1113	504	504	504	504	216	216

Portsmouth Local Plan - Housing Trajectory

