

Housing Delivery Test Action Plan 2024/25



May 2025

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1 Introduction to the Housing Delivery Test

1.1 Introduction

- 1.1.1 The Government's Housing Delivery Test (HDT) assesses whether a Council's housing requirement has been met, on average, over the last three years. This is based on the number of new homes completed compared to housing need. This HDT, for 2024/25, covers the three financial years 2020/21, 2021/22 and 2022/23. The HDT Action Plan (HDT AP) identifies the reasons for the Test not being met over that period and sets out an Action Plan (at Appendix 1) to increase levels of housing delivery in the future.
- 1.1.2 The HDT was introduced by the Government in 2018 as a monitoring tool aimed at speeding up the delivery of housing. The HDT is an annual measurement of housing delivery (the total number of completions of new houses and flats, including student and other communal accommodation) as a proportion of need, as set by the Government's "old" standard method¹, on average, in the HDT period (in this case, 2020 to 2023). The HDT results for all local authorities in England have been published annually since February 2019 and are usually published at the start of the year (January or February). The 2022 HDT was not published until December 2023, due to a Government consultation on substantive changes to the HDT for 2022. The Government did not proceed with the proposed changes, but the consultation resulted in a 10-11 month delay in publication of 2022 HDT figures. The 2023 figures were published in December 2024 and these are the latest figures available.
- 1.1.3 The HDT result determines the level of consequences applied to the local authority where the delivery of the housing requirement has not been met. National Planning Practice Guidance (PPG, Paragraph: 034 Reference ID: 68-042-20241212) provides further details on Government planning policies set out in the National Planning Policy Framework² (NPPF, 2024), including the Housing Delivery Test measurement. This states that:

'where delivery of housing has fallen below the housing requirement, certain policies set out in the NPPF will apply. Depending on the level of under-delivery these are:

- the authority should publish an action plan if housing delivery falls below 95%;*
- a 20% buffer to the local planning authority's 5 year land supply if housing delivery falls below 85%; and*
- application of the presumption in favour of sustainable development if housing delivery falls below 75%.*

These consequences apply concurrently, for example those who fall below 85% should produce an action plan as well as the 20% buffer. The consequences will continue to apply until the subsequent Housing Delivery Test measurement is published. The relevant consequences for any under-delivery will then be applied. Should delivery meet or exceed 95%, no consequences will apply.'

- 1.1.4 In line with NPPF Paragraph 11, the primary implication of the presumption in favour of sustainable development for decision takers is that policies which are most important for determining applications are out of date and hence planning permission should be granted unless:

¹ References in this report to the "old" standard method relate to the standard method figures prior to December 2024. The approach to calculating the standard method changed in December 2024 to what is referred to in this report as the "new" standard method. This is explained in more detail in section 3.11.

² https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

- The application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole.

1.1.5 This is sometimes known as applying the "tilted balance".

1.2 Structure of this Report

1.2.1 This report follows the structure set out below:

- Chapter 1 (this chapter) introduces and explains the HDT;
- Chapter 2 provides the latest HDT results;
- Chapter 3 sets out possible reasons for under-delivery;
- Chapter 4 sets out ways to reduce further under-delivery and measures to improve levels of delivery;
- Chapter 5 documents the Council's progress against the previous HDT AP for 2023-2024;
- Chapter 6 presents the conclusions and next steps;
- Appendix 1 is the HDT AP itself.

2. Housing Delivery Test Results December 2024

2. Introduction

2.1.1 The HDT Measurement Rule Book (Dec 2024³) sets out the method for calculating the HDT result. The HDT compares the net number of homes delivered over the **previous three monitoring years** to the homes needed over the same period as identified by the housing requirement for each authority. For Portsmouth, as the adopted Local Plan - the Portsmouth Plan⁴ (2012) is more than five years old, the housing requirement for the HDT period is that set by the Government's "old" standard method (the "new" standard method was not introduced until after the end of the HDT period).

2.2 HDT Results

2.2.1 The most recent HDT results were published by the Government on 12th December 2024 for the 2020/21 - 2022/23 period. The HDT results show that there was a shortfall of 1,703 dwellings over the HDT period, which means that PCC's HDT result is 26%, with 584 new homes having been completed in the three year period.

2.2.2 The Housing Delivery Test results 2020/21 - 2022/23⁵ are set out in Table 1 below. In light of the temporary disruption caused by the national lockdowns announced during 2020 to 2021 due to the COVID-19 Pandemic, Government reduced the period for measuring the homes required in 2020/21 by four months. No adjustment was made for 2021/22 despite the continuing impacts of the Pandemic, and no adjustment was made for 2022/23. Table 1 below shows what the original figure would have been in brackets if the Government had not adjusted the requirement for 2020/21. The requirement was reduced from 854 to 569 in 2020/21, meaning that PCC's result is 26% rather than 23%.

Table 1: Portsmouth Housing Delivery Test Result, December 2024

	Year			Total
	2020/21	2021/22	2022/23	
Number of homes required	569 (854)	823	856	2,248 (2,533)
Number of homes delivered	296	280	9	584
Difference	-269 (-554)	-587	-847	-1,703 (-1,988)
Housing Delivery Test Result				26% (23%)
Housing Delivery Test Consequence				Presumption and Action Plan and 20% buffer

2.2.3 To put the results in context, across the Partnership for South Hampshire (PfSH) sub region, four Local Planning Authorities (Fareham, Gosport, Havant and Portsmouth) saw their housing delivery fall below 75% in both 2022 and 2023 as can be seen in Table 2 below, with the addition of Southampton also falling below 75% in 2023.

³ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book>

⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2020/05/The-Portsmouth-Plan.pdf>

⁵ <https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement>

Table 2: PFSH Authorities Housing Delivery Test Results 2021, 2022, and 2023

Area Name	HDT: 2021 measurement	HDT: 2021 consequence	HDT: 2022 measurement	HDT: 2022 consequence	HDT: 2023 measurement	HDT: 2023 consequence
East Hampshire	138%	None	112%	None	88%	Action Plan
Eastleigh	178%	None	156%	None	122%	None
Fareham	62%	Presumption	42%	Presumption	55%	Presumption
Gosport	100%	Buffer	65%	Presumption	31%	Presumption
Havant	74%	Presumption	71%	Presumption	74%	Presumption
New Forest	141%	None	92%	Action Plan	75%	Buffer
Portsmouth	54%	Presumption	38%	Presumption	26%	Presumption
Southampton	138%	None	75%	Buffer	50%	Presumption
Test Valley	184%	None	189%	None	144%	None
Winchester	139%	None	154%	None	171%	None

2.2.4 PCC's HDT results mean that the Council has to apply the presumption in favour of sustainable development when determining planning applications, prepare an HDT AP for the period from 1 April 2023, and apply a 20% buffer to five year housing land supply calculations. This is the same position the Council faced as a result of the HDT results published in 2023.

2.2.5 Regarding HDT APs, the PPG (Paragraph: 039 Reference ID: 68-047-20190722) states that: *'The action plan is produced by the local planning authority where delivery is below 95% of their housing requirement. It will identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out the measures the authority intends to take to improve levels of delivery.'* The next two chapters of this report follow this guidance, starting with setting out potential reasons for under-delivery, then exploring ways to reduce the risk of further under-delivery, and then Appendix 1 sets out measures PCC intends to take to improve levels of delivery.

3 Potential reasons for under-delivery in Portsmouth

3.1 Introduction

3.1.1 This section of the report looks at the potential reasons why the housing requirement has not been met over the HDT period. The PPG (Paragraph: 042 Reference ID: 68-050-20240205) sets out various reasons which could be analysed in terms of under-delivery, including:

- *'barriers to early commencement after planning permission is granted and whether such sites are delivered within permitted timescales;*
- *barriers to delivery on sites identified as part of the 5 year housing land supply (such as land banking scheme viability, affordable housing requirements, infrastructure and utilities provision, involvement of statutory consultees etc.);*
- *whether sufficient planning permissions are being granted and whether they are determined within statutory time limits;*
- *whether the mix of sites identified is proving effective in delivering at the anticipated rate;*
- *whether proactive pre-planning application discussions are taking place to speed up determination periods;*
- *the level of ongoing engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees), to identify more land and encourage an increased pace of delivery;*
- *whether particular issues, such as infrastructure or transport, could be addressed at a strategic level - within the authority, but also with neighbouring and upper tier authorities where applicable.'*

3.1.2 The above are analysed for Portsmouth in the sections below.

3.2 Barriers to early commencement after planning permission is granted, and delivery of sites within permitted timescales

3.2.1 The PPG recommends that the local planning authority (LPA) examines barriers to early commencement after planning permission is granted and considers whether such sites are being delivered within permitted timescales. Barriers to commencement resulting from the LPA may be from, for example, granting permissions with overly restrictive conditions. Table 3 sets out the data on this topic.

Table 3: Number of dwellings commenced and lapsed April 2020 - March 2023

Year	No. of Dwellings permitted	Dwellings Commenced	No of Dwellings where permission has lapsed	No of dwellings under construction for more than 5 years	Dwellings completed
2020 - 2021	385	49	8	74	300
2021 - 2022	417	406	160	69	291
2022 - 2023	192	48	57	129	11
Total	994	503	225	272	602

3.2.2 As can be seen in Table 3 above, between April 2020 and March 2023 a total of 225 dwellings with planning permission were not delivered in the City because of a lapse of permission where development failed to commence within the permitted timescales. To compare this to what was successfully delivered in the City during this time, this equates to 37% of the total number of dwellings completed. This shows that the majority of the permissions that the City Council permits are being delivered.

- 3.2.3 Table 3 also shows that a number of dwellings have remained under construction for more than 5 years (272 dwellings, which represents 45% of the amount delivered during this period), suggesting that there are a number of sites which may have commenced implementation of their planning permission, but the build out rate of the site may be slow. Given that for a start to be made, in most cases planning constraints and conditions on development would have needed to have been satisfied, it is likely that development viability, finance, or other non-planning related constraints are responsible for these developments stalling during the construction phase.
- 3.2.4 Whilst every dwelling is needed to help meet Portsmouth's housing target, as the proportion of dwellings with lapsed permissions is minor compared with the number of total dwellings completed during this period, it seems unlikely that the Council has been creating major barriers to commencement through conditions attached to the grant of planning permission or other planning related issues.
- 3.2.5 However, it is important to highlight that, concerns surrounding nitrate pollution in the Solent resulted in planning applications being put on hold during part of the HDT period. It is likely that this played a part in delaying development within the City, which is explained in greater detail in section 3.10. After the mitigation strategy was put in place there was also a period of approximately two years from April 2020 when planning permissions were time-limited to one year rather than the usual three years due to the nature of the mitigation scheme. This will have potentially increased the likelihood of permissions lapsing.

3.3 Barriers to delivery on sites identified as part of 5 year housing land supply (allocated sites), and effectiveness of mix of sites in delivering at the anticipated rate

- 3.3.1 The PPG recommends that the LPA reviews sites identified as part of the 5 year housing land supply (which are largely allocated sites in Portsmouth's case), and whether the mix of sites identified in the adopted Local Plan is proving effective in delivering at the anticipated rate. The extant Portsmouth Plan (2012) is reliant on a number of strategic sites to meet the majority of the Council's housing target; a Site Allocations document was intended to follow the Core Strategy but was not progressed due to a change in direction in national planning policy. Table 4 below sets out the number of dwellings delivered on allocated sites from April 2020 to March 2023.

Table 4: Delivery on allocated sites April 2020 - March 2023

Strategic Allocation	Portsmouth Plan allocation	2020/21	2021/22	2022/23	Total
PCS1: Tipner	1,730	0	0	0	0
PCS2: Port Solent	500	0	0	0	0
PCS4: Portsmouth City Centre	1,600	277*	0	3	280* (note that an additional 1,075 dwellings were delivered prior to 2020/21, ratio applied)
PCS6: Somerstown and North Southsea	539	0	0	-277	-277

*277 of these completions were student accommodation (ratio of 2.5 applied, with every 2.5 student bedroom providing the equivalent of 1 C3 dwelling).

- 3.3.2 As can be seen in Table 4 above, delivery on the adopted Strategic Sites was limited in the 2020 to 2023 period. There has been some housing delivery in the City Centre largely from a significant amount of new student accommodation and office to residential conversions under permitted development rights. The allocation at Somerstown and North Southsea has

started, but has so far only consisted of demolition to make way for the new development meaning a large loss has been recorded in the housing completions. The housing allocations for Tipner and Port Solent are yet to come forward.

3.3.3 Portsmouth City Centre and Tipner are considered to have potential to deliver more development and new homes than was envisaged by the Portsmouth Plan (2012). Further detail on progress on taking forward adopted allocations is outlined in the Council's Authority Monitoring Report⁶.

3.3.4 There are a number of reasons why allocated sites have been slow to come forward:

1. **Physical site constraints** - flood risk, land contamination, as well as the high degree of nature conservation designations associated with the City play a role in inhibiting development on several of the strategic sites, such as Tipner. These also have an impact on development viability.
2. **Changing market conditions** - Changes at a national and global level have led to delays in bringing strategic sites forward in the City. The City Centre had secured permission for retail led expansion and redevelopment in the late 2000s. However, the changing market following the 2008 recession, the COVID-19 pandemic and the continuing move to e-commerce⁷ has removed much of the demand that would have driven that scheme, and resulted in the need for a new approach for development and growth in the area.
3. **Land assembly** - many of the City's strategic sites have required significant land assembly either by Portsmouth City Council as the Local Authority or a private developer or partnership. This has been a notable constraint for the Tipner Strategic Development Area, which has resulted in delays in delivery, but land assembly at Tipner is now complete.

3.3.5 The existing allocations are being revisited as part of the preparation of the emerging Local Plan, as well as new allocations being proposed. Further details can be found in Section 4.4 of this HDT AP.

3.4 Level of planning permissions being granted, and quantity determined within statutory time limits

3.4.1 The PPG recommends that LPAs consider whether sufficient planning permissions are being granted and whether they are being determined within statutory time limits. Table 5 sets out the data on this topic.

Table 5: Dwellings permitted, commenced and completed during 2020 - 2023

Monitoring Year	Dwellings Permitted	Dwellings Commenced	Dwellings Completed
2020/2021	385	49	300
2021/2022	417	406	291
2022/2023	192	48	11
Total	994	503	602

3.4.2 As can be seen in Table 5 above, 994 dwellings were granted planning permission over the three year period, of which 602 dwellings were completed, and a further 503 commenced.

⁶ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-applications/annual-monitoring-reports/>

⁷ E-commerce relates to commercial transactions conducted electronically on the internet, i.e. online shopping.

- 3.4.3 The number of completed dwellings amount to more than half of the number of dwellings granted planning permission during the same period. However, it is important to note that permissions may have been carried over from previous years and may not necessarily be "new" permissions. Nevertheless, the data strongly suggests that the Development Management process is not holding up delivery in the City, and that there may have been other reasons for lower housing delivery during the period, outside of the LPA's control.
- 3.4.4 Table 6 below shows the percentage of applications determined per year and over what timeframe. Note that this excludes applications where Planning Performance Agreements were put in place.

Table 6: Percentage of Applications Determined in time (Source MHCLG)

Year	Major decisions in time	Minor decisions in time	Other decisions in time
2020/21	100%	78%	74%
2021/22	87%	76%	73%
2022/23	48%	52%	52%

- 3.4.5 Table 6 shows that in years 2020/21 and 2021/22 most planning applications were determined within the statutory period, but during 2022/23 the performance dropped significantly, with only average 48% of Major and, 52% of Minor applications, and 52% of Other decisions being determined within the 13 week and 8 week deadlines. This would suggest that whilst determination rates were good at the beginning of the HDT period, the service declined in the final year, potentially posing a constraint to housing delivery for the period.
- 3.4.6 One issue which has been affecting determination rates has been the time taken to sign legal agreements following resolution to grant planning permission. Whilst there are no formal statistics on this, it is known by officers that legal agreements, particularly for larger schemes, can take months to put in place after resolution to grant is received. This has been largely due to a lack of staff resourcing in the Council's legal team.

3.5 Pre-application discussions

- 3.5.1 The PPG suggests that LPAs should ensure that proactive pre-planning application discussions are taking place to speed up determination periods. Table 7 provides data on pre-application submissions.

Table 7: Pre-application cases received April 2020 to March 2023

Year	2020-2021	2021-2022	2022-2023
No. of Pre-Apps	438	362	375

- 3.5.2 As can be seen in Table 7 above, Portsmouth City Council processed a significant number of pre-application submissions over the HDT period. Although there was a gradual decline during the HDT period, this could reflect the uncertainty affecting the housing market due to the COVID-19 pandemic during part of the HDT period.
- 3.5.3 Table 8 shows the approval rate for applications over the HDT period.

Table 8: Applications by type and decision made April 2020 - March 2023

(Source MHCLG)

Application Type	Decision	Year		
		2020-2021	2021-2022	2022-2023
Major	Granted	100%	83%	86%
	Refused	0%	17%	14%
Minor	Granted	89%	89%	89%
	Refused	11%	11%	11%

- 3.5.4 The low refusal rates shown in Table 8 may suggest that pre-application discussions undertaken have been effective.
- 3.5.5 It is evident from Table 7 that the Council is being proactive in having pre-planning application discussions with applicants (both internal and external) to speed up determination periods and achieve suitable outcomes. A lack of pre-application engagement is therefore, not considered to be a major barrier to delivery of housing.

3.6 Engagement with key stakeholders to increase pace of delivery

- 3.6.1 This section looks at whether there was sufficient on-going engagement with key stakeholders (for example, landowners, developers, utility providers and statutory consultees) during the 2020-2023 period to encourage an increased pace of delivery.
- 3.6.2 The Development Management team report that the objections raised by the Environment Agency and Historic England can take the longest to resolve. These organisations frequently use holding objections where they consider insufficient detail is provided on how to resolve issues affecting their interests. This can lead to delays in the determination of such planning applications, particularly where matters are complex and have competing factors. Officers continue to hold bilateral conversations with both organisations to try to improve relationships with a view to being able to resolve objections more quickly, or to avoid them altogether.
- 3.6.3 To identify further sites for housing as a means of increasing housing delivery, the City Council undertook stakeholder engagement as part of its preparation of the Housing and Economic Land Availability Assessment (HELAA). As part of the HELAA work, a "Call for Sites" was undertaken in the HDT period of 2020-23, in the winter of 2021/22. Major landowners and agents active in the City were contacted, as well as relevant individuals who had previously expressed an interest through Planning Policy consultations. Details on the Call for Sites were placed on the Council's website. Key information on specific aspects, such as size of site, current use and proposed scale of development was sought from respondents in a consistent manner.
- 3.6.4 A focused consultation with landowners also took place in February 2022. This involved contacting a selection of landowners/agents with land ownership interest in sites within the City Centre, Cosham and a selection of small sites.
- 3.6.5 These consultations resulted in a number of sites being put forward for development. Fifteen sites were submitted under the 2021/22 winter consultation; and over half of the sites submitted were new. The landowner consultation also resulted in positive engagement with landowners.

- 3.6.6 The proportion of sites being put forward and active discussions with landowners suggest that a lack of stakeholder engagement by the City Council is not a limiting factor for the number of potential housing sites coming forward. However, it is important to note that although a number of new sites were submitted, several were not deemed deliverable and/or developable following robust analysis under the HELAA. Thus, other factors, such as the physically constrained nature of the City and/or the viability of such sites, may be impacting the availability of sites for development.
- 3.6.7 Further engagement with key stakeholders took place to address particular issues specific to Portsmouth, which are outlined below, such as Nutrient Neutrality.

Particular Issues for Portsmouth

3.7 Insufficient housing land supply

- 3.7.1 Portsmouth has had a shortfall in housing land supply over recent years. Table 9 shows Portsmouth's published land supply positions from the AMR each year since 2016.

Table 9: Portsmouth's 5 year Land Supply position 2016 - 2024

	Monitoring Year							
	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Land Supply in years	5.1	4.7	4.4	4.4	3.8	2.9	3.31	4.97

- 3.7.2 As can be seen in Table 9 above, Portsmouth had a five year land supply in 2016/17 and in 2017/2018 it was only just under five years at 4.7 years. However, the Council's five year land supply declined in 2018/19, dropping to a low of 2.9 years in 2021/22 with a slight increase to 3.31 years in 2022/23. The most recent monitoring year of 2023/24 has shown a significant increase nearer to the 5 year land supply level, but this is beyond the end of the HDT period.
- 3.7.3 The primary reasons for the decline in the five year land supply during the HDT period are: the slow delivery of the strategic sites allocated in the Portsmouth Plan (2012), a large number of demolitions having taken place at one of the strategic sites, and also the limited amount of available development land within the City, given its physically constrained island geography. Total net completions (including C2) for 2022/23 came to only 11 dwellings, largely due to the loss of 277 dwellings at Leamington House and Horatia House. These sites will be redeveloped for a net gain in dwellings, but so far only the losses from demolition have been completed. The changes to the way national housing need is measured has also impacted Portsmouth's five year housing land supply measurements, as noted below in section 3.11.

3.8 Development Viability

- 3.8.1 There are two main factors that affect development viability in Portsmouth. The first of these is the low house prices compared to much of the surrounding area; the average house price in Portsmouth at the start of this HDT period was 203rd lowest (out of 339) out of all the local authorities nationwide, at £237,526⁸. This is despite the fact that Portsmouth is located in the

⁸ PCC Development Viability Assessment (October 2020), note that house price data has been updated in the PCC Development Viability Assessment 2024, showing a nearly 30% increase across the City, which is reflected

south east of England, which is characterised by higher house prices compared to elsewhere in the country. The second main factor is the geographically constrained nature of the City, which limits the amount of land available for development (due to flooding and nature conservation designations, and the built-up nature of the City). The consequence of this is that the majority of sites identified as being suitable for development are brownfield which, due to previous land uses and potential contamination and costs associated with addressing flood risk and other policy requirements, can result in challenging viability.

- 3.8.2 The adopted Portsmouth Plan (2012) and the Community Infrastructure Levy (CIL) were prepared with supporting City-wide viability appraisals. However, the economy has seen significant changes since the Portsmouth Plan (2012) was published and its evidence base prepared. During the HDT period (2020-2023) the COVID-19 pandemic hit, with widely documented disruption and significant impacts on the economy. This had implications for build costs and operations, and negatively impacted viability and delivery of housing across the City. Build costs remain high despite the impacts of the COVID-19 pandemic having largely subsided, partly due to the war in Ukraine having increased energy costs with a knock-on impact on build costs.

3.9 COVID-19 Pandemic

- 3.9.1 The unprecedented challenges of the pandemic brought numerous challenges upon the Council as a whole in the early part of the HDT monitoring period, including challenging the Development Management service's ability to continue progressing planning applications in a timely fashion during successive lockdowns. Below are some examples of how the pandemic had an impact on progressing planning applications between 2020/21 and 2022/23:

- Planning Committees were moved online;
- There was no validation of planning applications for c. 5 weeks (March-April 2020), as Validation staff did not have laptops and were not allowed in the office;
- The issuing of decisions was switched from the Validation Team to Officers;
- Delegated reports and enforcement notices had to be signed in live ink, which posed many difficulties with people working from home.

- 3.9.2 However, officers continued to work diligently from home to ensure democratic decision making could continue.

- 3.9.3 There was also a significant impact on the construction industry itself, with many sites facing material shortages, and having to implement social distancing which impacted the rate of sites being delivered.

- 3.9.4 In response to the COVID-19 pandemic, the Ministry for Housing Communities and Local Government reduced the housing requirement for 2020/21 by four months in the HDT 2021. Even though the impact of COVID-19 has now generally subsided, it will continue to impact on Portsmouth's HDT results for years to come, as the years affected by the pandemic are still falling within the 3 year HDT period.

in the Pre-Submission Local Plan. House price data from the 2020 Development Viability Assessment is used here as it is relevant to this HDT period, whereas data from the 2024 Development Viability Assessment post-dates the HDT period.

3.10 Nutrient Neutrality

- 3.10.1 For many years, Natural England and Centre Government have been issuing and updating guidance to LPAs and developers on how to become "nutrient neutral". Following changes in European Case law, and fears over increasing nitrate pollution in the Solent, in June 2019 Natural England advised five local planning authorities (Southampton, Portsmouth, Fareham, Gosport and East Hampshire) that planning applications for new housing should be put on hold, unless they could demonstrate they were nutrient neutral. Portsmouth took the advice on board and made the decision to put determining planning applications on a temporary hold.
- 3.10.2 Only a few months after Natural England issued their advice, in November 2019, PCC had approved the first 'Interim Nutrient Neutral Mitigation Strategy for New Dwellings' to address the need for mitigation. It was then updated and consequently approved in June 2022⁹.
- 3.10.3 The issues surrounding nutrient neutrality had an impact on DM services; particularly in the April 2019 - March 2020 (just before this HDT period) when, apart from several exceptions, no residential or overnight accommodation consents were issued. This resulted in a backlog of planning applications. PCC were quick to respond and put a strategy in place that allowed development to be permitted again by November of 2019 (working with neighbouring local authorities). Whilst the backlog in applications resulting from the temporary hold on granting permissions has been cleared, as there is now a mitigation solution, the need to mitigate the nitrate impacts of development are likely to have an impact on delivery for years to come, due to the increased costs of delivering this mitigation impacting development viability. For a period of approximately two years from April 2020, planning permissions issued were also time-limited for one year rather than the usual three years. This was due to the nature of the mitigation scheme involving selling a finite number of "credits" to developers and having to monitor how many credits were remaining.

3.11 Changes to National Housing Need Figures

- 3.11.1 It should be noted that changing national housing need figures have also been a factor in under-delivery, as the housing need figure for every authority has been changing on a regular basis over recent years, generally increasing over time. Since initial proposals for many of the City's strategic sites were developed and adopted, the Government introduced the Standard Method for calculating housing need (referred to as the "old" standard method in this report). This is a "policy off" figure, that does not account for the City's significant physical constraints on sites, and in the absence of an up to date Local Plan, has resulted in a much higher housing need for the City, against which the HDT is measured, than the adopted Portsmouth Plan (2012) and its supporting evidence, which has a target of 420 dwellings per annum.
- 3.11.2 More recently, in December 2024, the Government introduced the "new" standard method, which uses a different methodology to the "old" standard method (stock-based rather than population projection-based). Table 10 below illustrates how housing need figures have changed over time, first as revised inputs became available, then when changes to the standard method took effect. The housing need figures beyond the HDT monitoring period (2024 onwards) are provided for context, but did not take effect during the HDT monitoring period to which this HDT AP relates.

⁹ https://www.portsmouth.gov.uk/wp-content/uploads/2022/07/Updated_Nutrient_Neutral_Strategy_post_cabinet_version-June22.pdf

Table 10: Portsmouth Housing Need based on Government's Standard Method

Date of release	Change	Annual figure
Sep 2017	Initial publication ("old" standard method)	835
May 2018	Revised affordability	863
Sep 2018	2016-based household projections	595
Oct 2018	Revised NPPF	863
May 2019	Revised affordability	867
Dec 2020	Revised Methodology	855
Apr 2021	Revised household projections and affordability	872
Dec 2022	Revised household projections and affordability	906
Jan 2023	Revised household projections	910
Apr 2023	Revised affordability	899
Jan 2024	Revised household projections	894
Mar 2024	Revised affordability	897
Dec 2024	"New" standard method, revised NPPF	1,021
Mar 2025	Revised affordability	1,016

3.11.3 It is noted that updates to the Government's standard method figures will continue to be the basis for the Housing Delivery Test until adoption of Portsmouth's emerging Local Plan (expected in 2027). Use of the standard method as the City's housing requirement for HDT purposes remains an unrefined and unconstrained method of assessment that does not reflect the City's constrained island geography, nor local availability and suitability of sites for housing development, as outlined in the Council's Housing and Employment Land Availability Assessment (HELAA, 2023¹⁰) and wider comprehensive evidence base.

3.12 Conclusions on reasons for under-delivery

3.12.1 Having analysed the factors identified in the PPG that may be responsible for under-delivery of new homes against the Government's standard method housing need figure for the HDT period, the data available for the 2020/21 - 2022/23 period indicates that the City Council's planning service had been performing well at the start of the period, but this dropped substantially in 2022/23. There was a drop in the number of homes permitted in 2022/23 compared to the previous two years which will have contributed to under-delivery.

3.12.2 Possible barriers have been identified in the challenges of delivering of large-scale strategic sites allocated in the Portsmouth Plan (2012), including physical site constraints, changing market conditions, and land assembly which affect viability. There have also been more recent challenges to viability, including flood defence needs and habitat mitigation requirements, and significant national rises in build costs. The five year housing land supply dropped significantly during this period (although it has picked up again since then), and there are recognised constraints on land supply, including the City's constrained island geography, the lack of land available for development, and the development of challenging brownfield sites.

¹⁰ https://www.portsmouth.gov.uk/wp-content/uploads/2024/08/02-PCC_Housing-and-Employment-Land-Availability-Assessment_2023-Report_FINAL-latest-version-for-CDL.pdf

- 3.12.3 The COVID-19 pandemic had some impact on delivery early on in the HDT period, but this is now considered to have largely subsided.
- 3.12.4 Nutrient neutrality issues during the period also put a number of planning applications on hold, which affected the rate of delivery within the City. Although this hold on determining planning applications was temporary, it is likely that the need to mitigate against such environmental impacts of development will have an impact on delivery for years to come, as the financial contributions required to address nitrate neutrality impact on viability.
- 3.12.5 Overall, the evidence supports the conclusion that the main constraints to delivery (as reflected in delivery in the 2020 - 2023 period) in the City were partly due to how the Council's Planning Service performed, but were also due to issues facing the City which are out of its control, relating to its unique geographical constraints including its constrained island geography, the limited availability of developable land due to the built-up nature of the City, flooding and nature conservation designations, low house prices, the viability of brownfield land, as well as changing environmental case law and the Government's position on the nitrate pollution issue in the Solent. This is set against the high (and ever increasing) housing need figure generated by the standard method, which forms the housing requirement for the City used for the HDT in the absence of an up to date local plan.

4 Actions to Improve Housing Delivery

4.1 Introduction

4.1.1 To address the potential reasons for under-delivery of housing in Portsmouth identified in section 3, the Council has considered the actions which could be taken by local planning authorities as part of their action plan outlined in the PPG Paragraph: 043 Reference ID: 68-051-20190722, as set out below:

- *'revisiting the Strategic Housing Land Availability Assessment (SHLAA)/ Housing and Economic Land Availability Assessment (HELAA) to identify sites potentially suitable and available for housing development that could increase delivery rates, including public sector land and brownfield land;*
- *working with developers on the phasing of sites, including whether sites can be subdivided;*
- *offering more pre-application discussions to ensure issues are addressed early;*
- *considering the use of Planning Performance Agreements;*
- *carry out a new Call for Sites as part of plan revision, to help identify deliverable sites;*
- *revising site allocation policies in the development plan, where they may act as a barrier to delivery, setting out new policies aimed at increasing delivery, or accelerating production of an emerging plan incorporating such policies;*
- *reviewing the impact of existing Article 4 directions for change of use from non-residential uses to residential use;*
- *engaging with key stakeholders to obtain up-to-date information on build out of current sites, identify any barriers, and discuss how these can be addressed;*
- *establishing whether certain applications can be prioritised, conditions simplified or their discharge phased on approved sites, and standard conditions reviewed;*
- *ensuring evidence on a particular site is informed by an understanding of viability;*
- *considering compulsory purchase powers to unlock suitable housing sites;*
- *using Brownfield Registers to grant permission in principle to previously developed land; and*
- *encouraging the development of small and medium-sized sites.'*

4.1.2 Not all of the above actions are relevant to Portsmouth, as they are not all issues which Portsmouth needs to overcome. The relevant potential actions listed in the PPG are discussed below.

4.2 Revisiting the Housing and Economic Land Availability Assessment (HELAA)

4.2.1 Following a Call for Sites in winter 2021/22, Portsmouth City Council completed a new HELAA in December 2023 (published in July 2024), based on monitoring data up to 31st March 2023, i.e. the end of the HDT period to which this report relates. The previous HELAA had been published in 2021. The HELAA identifies potential deliverable and/or developable land for housing and employment use within the City. A wide range of sites were considered in the 2023 HELAA, including public sector land and a large number of brownfield sites. The 2023 HELAA identified a potential supply of 10,666 dwellings for the City, of which 2,127 dwellings were considered 'deliverable' in five years, and 8,357 were considered 'developable' (could be delivered in 6-10 years). This total supply was much greater than that identified in the 2021 HELAA, which was 4,681 dwellings.

- 4.2.2 The Council now plans to update the HELAA again this year, starting with a Call for sites which ran during April 2025. As part of the call for sites, developers, landowners and agents and any other relevant organisations on the Council's consultation database were contacted to see if they had any sites available for development. Landowners of existing sites in the HELAA were also contacted during April to check for any updates, and to ensure that their sites remain available for development. Those with sites being proposed for allocation in the emerging Local Plan are being contacted separately to see if any updates are needed to their Statements of Common Ground for the emerging Local Plan, which includes confirming availability for the development proposed in the emerging Local Plan.
- 4.2.3 The Brownfield Register has been checked for potential sources of new sites as part of the new HELAA, but this is not used to grant "permission in principle".

4.3 Development Management

Development Management (DM) has been identified as a barrier to delivering new homes in the final year of the HDT period, and the COVID-19 pandemic significantly impacted the DM team in the early part of the HDT period, with reductions in the service capacity, resulting in a backlog of applications awaiting determination, an issue that many local planning authorities saw during this time. A number of different approaches were taken to reduce the backlog. Principal among them was carrying out a full process review of the application system, with the help of the Council's 'System Thinking' interventionist which took place in summer-autumn 2021, with changes implemented in early 2022. This process review identified a number of areas where efficiencies could be created, and process wastage removed. Areas of improvement included: how advice and application decisions are taken, and how officer reports could be more concise. These two principal measures streamlined the application system and made an important difference to average time taken for applications determined under delegated powers.

- 4.3.1 PCC's Planning Department was formally warned by central Government in January 2023 about the danger of being placed in "Special Measures" due to performance with non-Major applications. DM consequently had a period of working to reduce the backlog of planning applications in spring/summer 2023. This performance drive was very effective in determining a significant number of applications and so, reducing the total volume of live applications.
- 4.3.2 Whilst steps have been taken to improve the determination process, the Council has also sought to increase staffing capacity. This has been undertaken in two ways: the outsourcing of a number of cases to a private sector company experienced at managing planning applications in 2021; and the recruitment of additional temporary contract staff to increase the number of professional planners assessing and processing applications. Staff numbers were increased significantly across the second half of 2020.
- 4.3.3 Through the review and amendment of internal processes to remove duplication and wastage, it is considered that the Council is now in a position to retain a sustainable workforce to meet demand and ensure all applications have a decision within the expected timeframe. The Department is also continuing to actively promote the wider use of Planning Performance Agreements (PPAs) to establish a clear officer resource for projects (including other key departments such as Highways) against agreed determination timeframes, providing significant pre-application advice for applicants as part of this process in order to ensure well designed housing and swift delivery. The use of PPA templates is being deployed across the DM team for all major applications. Other measures being considered include the wider use of Unilateral Undertakings as opposed to Section 106 agreements,

required potentially at the validation stage of applications, to ensure that delays in application determination are minimised.

- 4.3.4 Greater use of bodies such as Design South East (DSE) and the Design Council is also being promoted to help deliver optimal development layouts and designs that, when submitted, can be processed and approved without significant delay. For example, DSE fed into the development process for schemes at Tipner East, and as a result, densities on the scheme were increased, thereby increasing housing numbers on the site.
- 4.3.5 The DM team engage regularly with applicants to identify any barriers to delivery and to try and help overcome these.
- 4.3.6 Sub-division of sites is not considered likely to help increase delivery of housing in Portsmouth. Having reviewed existing Article 4 directions, there are none in place which are likely to contribute to under-delivery of housing. Important applications, such as those for allocated sites, tend to be prioritised over other applications. Onerous planning conditions do not appear to be a barrier to timely delivery of sites with planning permissions.

4.4 The emerging Portsmouth Local Plan

- 4.4.1 The emerging Local Plan will involve revising site allocations from the existing development plan (Portsmouth Plan, 2012), in some cases increasing the potential number of dwellings being allocated on those sites, and in other cases introducing housing as part of the allocation where this was not included previously, or being more specific about what level of housing is anticipated. The extant site allocations being revised relevant to housing include:
- Tipner West and Horsea Island East (PCS1 and PCS3 in the Portsmouth Plan 2012);
 - Tipner East (PCS1 in the Portsmouth Plan 2012);
 - Portsmouth City Centre (PCS4 in the Portsmouth Plan 2012, though this now includes additional land);
 - Fratton Park & the Pompey Centre (PCS7 in the Portsmouth Plan 2012);
 - St James' & Langstone Campus (MT3 and MT4 in the Portsmouth City Local Plan 2006);
 - Port Solent (PCS2 in the Portsmouth Plan 2012);
 - Fraser Range (PCS9 in the Portsmouth Plan 2012);
 - Somers Orchard (PCS6 in the Portsmouth Plan 2012).
- 4.4.2 The aim of including the above amended allocations in the emerging Local Plan is to increase housing delivery, providing more up-to-date, and clearer policies for the developers of these sites to be guided by. The emerging Local Plan is being informed by the latest evidence, including that relating to site availability and development viability.
- 4.4.3 A new, more ambitious density policy is being proposed in the emerging Local Plan which will seek to increase housing delivery. Three types of residential density zones are proposed: low (>40dph), medium (>80dph) and high (>120dph). The proposed policy is more ambitious than the current adopted policy from the Portsmouth Plan (2012). It is anticipated that these thresholds will help to make more efficient use of the land available for development within the City, and in turn enable greater housing delivery.

- 4.4.4 The emerging Local Plan identifies a large number of small and medium-sized sites for development (in an appendix) in order to encourage more smaller developments to come forward in the City in line with paragraph 73 of the NPPF. These sites have so far been identified through the 2023 HELAA, but more sites will most likely be added once the results of the 2025 HELAA have been collected.
- 4.4.5 In its Local Plan, Portsmouth is seeking to respond positively to the challenge of housing delivery. However, the City has very little land available for potential housing development given that it is already heavily urbanised, and due to its constrained island geography. The few open areas Portsmouth does have tend to be protected habitats of strategic importance, or public open spaces of strategic importance to the City and local communities.
- 4.4.6 The Pre-Submission Local Plan (Regulation 19) consultation took place in summer 2024. Whilst submission of the Local Plan had been planned for March 2025, following a negative IROPI decision on the proposed allocation at Tipner West and Horsea Island East, the Local Plan timetable has been delayed so that the allocation can be amended, and other necessary amendments made (in particular relating to applying the new NPPF, 2024). The Council now intends to consult on a Local Plan Addendum (Regulation 19) in winter 2025, with expected submission (Regulation 20) in spring 2026 in line with the Local Development Scheme¹¹.
- 4.4.7 As part of the Local Plan preparation, Portsmouth has been working with neighbouring authorities to establish if any of them are able to accommodate any unmet housing need from Portsmouth and deliver it in their authorities under the Duty to Cooperate. Whilst this will not help meet the Housing Delivery Test, as the housing would not be delivered in Portsmouth, it is hoped that the process will help to increase the supply of housing more generally. So far, agreement has been reached with Fareham to take 800 dwellings, which is planned for in its Local Plan. A further agreement is also being put in place with Winchester.

4.5 Development Viability and Delivery

- 4.5.1 Due to the built up nature of the City and areas of challenging viability, sites can be difficult to bring forward. This is reflected in the City Council's Development Viability Assessment¹² (2024) which underpinned the recommended approach for levels of developer contribution and affordable housing proposed in the Council's Pre-Submission Local Plan (Regulation 19) and will continue to inform the emerging Local Plan Addendum.
- 4.5.2 The 2024 Development Viability Assessment notes that while house prices have increased in the City at a broadly similar rate to build costs, additional costs have resulted from nationally imposed standards, which include Option 1 of the Future Homes Standard and the Accessible and Adaptable Standards, and adding second staircases to flatted developments.
- 4.5.3 The emerging Local Plan sets aspirational targets for affordable housing of 30% but includes policy criterion to enable case by case viability testing as per the Viability Assessment's recommendations. It is hoped that taking this approach will increase the level of housing delivery, particularly on small and medium sized sites across the City by ensuring that developer contribution requirements are appropriate.

¹¹ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/04/Portsmouth-LDS-April-2025.pdf>

¹² [portsmouth.gov.uk/wp-content/uploads/2024/07/PCC-Development-Viability-Assessment-Update_2024.pdf](https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/PCC-Development-Viability-Assessment-Update_2024.pdf)

- 4.5.4 The emerging Local Plan does not place further burdens on development over and above affordable housing requirements, as the Council is mindful of the viability challenges facing developers in the City. Following recommendations from the Council's 2021 Viability Study, policy requirements on things like water efficiency, adaptability, and sustainability, have been kept to a minimum. This approach has been ratified by the more recent Development Viability Assessment published in 2024. Whilst the Council would have preferred to have taken a more aspirational approach, for example on sustainability, it is recognised that this is not possible given the viability challenges in the City.
- 4.5.5 The Council is fully aware of the continuing challenge of viability to development in the City, and will continue to monitor the situation and keep viability under review, as recommended by the Development Viability Assessment (2024). It should be noted that the development proposed in the emerging Local Plan, through the strategic allocations and site allocations and the housing target, is accompanied by a comprehensive monitoring and delivery framework, including delivery mechanisms, triggers and actions. This will help the Council keep track of delivery and take steps to address under-delivery if necessary.

4.6 Council's Interim Nutrient Neutral Mitigation Strategy

- 4.6.1 Section 3.10 of this report highlights how guidance from Natural England and the Government impacted on the Development Management process and housing delivery in the three year period from 2020/21 to 2022/23. The Council adopted the first version of the Interim Nutrient Neutral Mitigation Strategy for new dwellings on the 29th November 2019. The updated version of the strategy was published in June 2022. The Strategy provides a robust framework through which planning applications can achieve nutrient neutrality. Three mitigation options are outlined in the Strategy, including an option to purchase "mitigation credit", secured in perpetuity through developer contributions. This strategy is important to help unlock more sites for development, and its requirements are factored into the Local Plan Development Viability Assessment (2024). The Strategy is envisioned to last three to four years to help to enable housebuilding to continue within the City whilst a longer term solution is worked on with Partnership for South Hampshire and relevant stakeholders.
- 4.6.2 Hampshire and Isle of Wight Wildlife Trust (HIWWT), as well as other landowners within the catchment area, are offering offsetting "credits" for purchase. The Council has entered into an agreement with the HIWWT regarding the Nunwell Estate on the Isle of Wight, which includes a bulk purchase of offsetting "credit" for mitigation purposes (750-1,500kg), as well as other requirements such as a Nitrates Management Plan, to help enable housing delivery within the City. There are also currently a number of other landowners within the East Hampshire catchment area offering nitrogen offsetting opportunities which can be secured to enable the grant of planning permission, where this can be agreed with the local planning authority and Natural England.
- 4.6.3 The Council is continuing to liaise with potential partners to find a more permanent solution to nitrates in the City, but nevertheless the adoption of the Interim Nutrient Neutral Mitigation Strategy has enabled development to resume, and the severity of its impact on the delivery of housing within the City has been minimised.
- 4.6.4 The Interim Strategy, which has utilised water efficiency updates to the Council's housing stock, is also coming to the end of its anticipated timescale (2021-2023/24). Updating the Strategy would continue to help enable planning permissions to be granted without the risk of legal challenge, helping housing to further continue in the City.

4.7 Council-led Development

- 4.7.1 The City Council is one of the largest residential landowners in the City, and it also owns land in neighbouring boroughs including Havant and East Hampshire. This has allowed the Council to take an active role in delivery of housing within the City.
- 4.7.2 The Council is committed to addressing the City's housing shortage and within its Housing Directorate has implemented schemes to improve the delivery of both affordable and market housing within the City.
- 4.7.3 There are a number of Council estate areas within the City where Portsmouth City Council has significant land holdings, such as Somers Orchard which is a proposed site allocation in the emerging Local Plan which now has resolution to grant planning permission pending the signing of a legal agreement. The housing management teams in the Council are working to understand where Council owned land holdings can be used to bring forward development.
- 4.7.4 The Council's intention is to build the homes people in Portsmouth need and can afford and to ensure that these homes are as energy efficient as possible. The Council is utilising teams capable of delivering homes and have in house expertise in architecture, landscape architecture, building surveying, mechanical and electrical services, as well as energy services.
- 4.7.5 The City Council is currently looking at other forms of development rather than direct delivery which may help to deliver homes more quickly. Opportunities include joint ventures with private developers and with the Council's own housing company, Ravelin Housing Ltd¹³. Ravelin Housing Ltd (RHL) is a wholly owned development company set up with the aim to deliver both affordable and private housing for sale and for rent. RHL is the commercial development arm of the Ravelin Group Limited family of companies.
- 4.7.6 RHL has been brought forward by the City Council not to compete with, but rather to complement the private sector developers in the City at a time when there is clear evidence that there is market failure. RHL will deliver projects aligned with the Council's corporate objectives, thereby supporting the City's economic growth and regeneration needs whilst specifically focusing on satisfying the demand for new housing of all tenures.
- 4.7.7 RHL's strategic goals are to deliver multi-tenure housing for sale and rent with a target to deliver a thousand homes over ten years commencing with development delivery from 2021. There have been numerous sites identified for development which are currently in the initial stages of the planning process or at pre-application stage.
- 4.7.8 In addition to the schemes being brought forward by Ravelin, the City Council has close involvement in a number of strategic sites, most notably at Tipner and the City Centre. This has involved the Council being directly involved in land assembly and compulsory purchase to enable the delivery of these strategic sites.

¹³ Ravelin Housing - <https://www.portsmouth.gov.uk/services/development-and-planning/regeneration/improving-your-city/ravelin-housing/>

5 Monitoring the Council's Progress

5.1 Introduction

5.1.1 This section of the report considers progress made by the Council against the previous HDT AP. With the publication of the Housing Delivery Test results in December 2023, Portsmouth achieved less than the 75% of the housing required. As a result, PCC were required to prepare an action plan, include a 20% delivery buffer to its 5 year housing land supply and apply the presumption in favour for sustainable development. This section provides an update on the actions set out in the Housing Delivery Test Action Plan 2023 - 2024. It uses a RAG system to show the Council's progress.

5.2 Progress against the HDT Action Plan 2023-2024

5.2.1 Table 11 below presents an update on progress against the previous HDT Action Plan from 2023-2024.

Table 11: Update on progress against the HDT Action Plan 2023-2024

	Green: The action has been completed		Amber: Work to address the action is underway		Red: The action has not yet been implemented
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Cause	Action	Update	Progress
Strategic Issue: Housing Land Supply			
Housing Land Supply	Continue to progress the emerging Local Plan, which has identified new sources of housing supply and was consulted on in Summer 2024. This includes strategic sites, site allocations and sites identified from the Housing and Economic Land Availability Assessment (HELAA, 2023).	The Council has continued to make progress on the emerging Local Plan. Whilst submission had been scheduled for spring 2025, this has been delayed due to the Government issuing a negative IROPI decision on the proposed site allocations at Tipner West and Horsea Island East. A Local Plan Addendum is now scheduled to be consulted on in winter 2025, with submission now following in spring 2026, and adoption expected in spring 2027. The emerging Local Plan includes strategic sites, site allocations and sites identified in the HELAA. The Planning Policy Team is working with both developers and other partners to ensure deliverability of sites, in particular regarding viability and availability to meet the Council's housing need. Statements of Common Ground have been prepared and agreed with landowners/developers/promoters of sites to increase certainty of delivery. The Council is now in the process of updating those Statements of Common Ground following the delay in the Local Plan submission. New strategic sites in the emerging Local Plan, which were not present in the Portsmouth Plan (2012), include: St James'	

Portsmouth City Council Housing Delivery Test Action Plan 2024/25

Cause	Action	Update	Progress
		& Langstone Campus and Fratton Park & the Pompey Centre. New site allocations within the emerging Local Plan which allocate residential land use include: St John's College and Fraser Range. Somers Orchard and Port Solent are also site allocations in the emerging Local Plan, but currently fall under PCS2 and PCS6 in the 2012 Portsmouth Local Plan. The emerging Local Plan identifies housing sites from the HELAA in appendices. These include a large number of small and medium sized sites, which make an important contribution to housing supply in the City. This list of sites will be added to following the completion of a new HELAA in 2025.	
	Update the HELAA on a regular basis.	The 2023 HELAA is currently being updated, starting with a new 'call for sites' which ran during April 2025. It will be finalised later on in the year, and updated on a regular basis, as appropriate.	
	Update the Brownfield Register by 31 December on an annual basis.	The Brownfield Register was updated in December 2024 and will continue to be updated annually as required. The 2024 Brownfield Register included 102 sites, which is a slight increase from the 2023 Brownfield Land Register.	
Progress with Duty to Co-operate and sub-regional Strategic Planning	Update the South Hampshire Spatial Position Statement to be undertaken and agreed by PfSH and Local Authorities.	The latest PfSH Spatial Position Statement ¹⁴ was approved by Joint Committee in December 2023.	
	Continue to work collaboratively and update bilateral Statements of Common Ground/documents with neighbouring local authorities.	In preparation for the submission of the emerging Local Plan, Statements of Common Ground have been agreed between the Council and neighbouring local planning authorities, under Duty to Co-operate. This includes Winchester City, Havant, Gosport, East Hampshire and the Isle of Wight. These will be updated due to the delay in submission of the Local Plan, and the requirements to follow the 2024 NPPF and to use the "new" standard method for establishing housing need.	
Strategic Issue: Development Viability and Delivery			
Bringing sites forward	Whole Plan Viability Assessment completed in May 2024 as evidence to the emerging Local Plan.	A Development Viability Assessment (2024) was prepared to reflect the latest policy and economic context and support the Pre-Submission (Regulation 19) Plan. The	

¹⁴ <https://www.push.gov.uk/work/planning-and-infrastructure/push-position-statement/>

Portsmouth City Council Housing Delivery Test Action Plan 2024/25

Cause	Action	Update	Progress
		assessment was also amended to take account of the comments received during the Regulation 18 consultation. If any further updates are required as a result of amending policies for the Local Plan Addendum (such as adding a split for social rent and affordable rent), these will be assessed for potential impacts on viability if deemed necessary.	
	Ongoing work with landowners and developers to prepare and agree Statements of Common Ground on all strategic sites and site allocations in the Local Plan to provide up to date evidence on viability and feasibility of individual sites.	As part of Local Plan preparation, Statements of Common Ground have been prepared for most proposed allocations. These will be updated as necessary to support the Local Plan Addendum.	
	Continuing pre-application discussions and Planning Performance Agreements on major development to speed up determination times, as well as increase the quality of development.	The DM team engages with potential applicants regularly on re-application submissions, and will continue to do so. They have also implemented the use of PPA templates for major applications and will continue their use as appropriate.	
	Continue to support Portsmouth City Council Housing and Council owned Ravelin Housing company to deliver new and affordable homes across the City.	The Planning Department continues to work closely with the Housing Department in identifying new housing sites and helping bring applications forward to meet the City's housing need.	
Identifying deliverable and developable sites	Continued work to progress the Local Plan, which identifies sites for housing development, both to be deliverable within five years, and developable over the Plan period.	The Council has continued to make progress on the new Local Plan. Whilst submission had been scheduled for spring 2025, this has been delayed due to the Government issuing a negative IROPI decision on one of the proposed site allocations at Tipner West and Horsea Island East. A Local Plan Addendum is now scheduled to be consulted on in winter 2025, with submission now following in spring 2026, and adoption expected in spring 2027. The emerging Local Plan includes strategic sites, site allocations and sites identified by the HELAA. The Planning Policy Team is working with both developers and other partners to ensure deliverability of sites, in particular regarding viability and availability to meet the Council's housing need. Statements of Common Ground have been prepared and agreed with landowners/developers/promoters of sites to increase certainty of delivery. The Council will update those Statements of Common Ground following the delay in the Local Plan submission. New strategic sites in the emerging Local Plan, which were not present in the 2012	

Portsmouth City Council Housing Delivery Test Action Plan 2024/25

Cause	Action	Update	Progress
		Portsmouth Plan (2012), include: St James' & Langstone Campus and Fratton Park & the Pompey Centre. New site allocations within the emerging Local Plan which allocate residential land use include: St John's College and Fraser Range. Somers Orchard and Port Solent are also site allocations in the emerging Local Plan, but currently fall under PCS2 and PCS6 in the Portsmouth Plan (2012). The emerging Local Plan identifies housing sites from the HELAA in appendices. These include a large number of small and medium sized sites, which make an important contribution to housing supply in the City. This list of sites will be added to following the completion of a new HELAA in 2025.	
Strategic Issue: Development Management			
Continuous Improvements to avoid potential delays to the granting of planning permission	The use of PPA templates for major applications.	The Development Management Team have implemented the use of PPA templates for major applications and will continue their use when appropriate.	
	Wider use of s106 Unilateral Undertakings at the validation stage of applications to ensure that delays in application determination are minimised.	Wider use of s106 Unilateral Undertakings at the validation stage has been implemented and has had some impact in minimising the delays in determination.	
	Ensure team is fully resourced as required.	The Council continues to work on ways of ensuring that the Development Management Team is fully resourced with the Council looking at ways to improve staff retention.	
Strategic Issue: Nutrient Neutrality			
Nitrates pollution in the Solent	Following the update of the Interim Nutrient Neutral Mitigation Strategy, adopted in 2022, continued engagement and co-operation on appropriate longer term strategic solutions with PfSH and other partners.	The Strategy was approved at Cabinet in February 2022 ¹⁵ and published in June 2022.	

¹⁵ PCC Cabinet report and decision from 6 February 2022 on the Updated Interim Nutrient Neutral Mitigation Strategy - <https://democracy.portsmouth.gov.uk/jelListDocuments.aspx?CId=126&MId=4749&Ver=4>

6 Conclusions and Next Steps

6.1 Conclusions

6.1.1 Portsmouth City Council has identified the following potential barriers for the 2020-23 period (as identified in section 3 of this report):

- **Development management:** Development Management was found to be a barrier to the delivery of new homes in the final year of the monitored period, including the length of time taken to put in place legal agreements. The Council is striving to continue to make improvements to its planning applications service for to ensure quality outcomes for all.
- **Housing land supply:** There have been challenges in delivering strategic sites from the Portsmouth Plan (2012), and while positive engagement and consultation on the identification of development opportunities will continue through progression of the emerging Local Plan, the constrained island geography of the City and its limited supply of developable land, means that it is unlikely Portsmouth will be able to meet the housing need as defined by the "new" standard method.
- **Development viability and delivery:** Poor development viability in the City restricts growth and investment for housing development and limits opportunities for sites to come forward.
- **COVID-19:** This presented challenges in the early part of the HDT period, but these have now largely been resolved.
- **Nutrient neutrality:** A temporary hold was put on planning applications in the early part of the HDT period due to nutrient neutrality. The issues surrounding nutrient neutrality have been largely resolved through publication of the Nutrient Neutral Mitigation Strategy, but this will continue to be a challenge to development viability due to financial contributions being required to address this.

6.1.2 The Council is cognisant of these delivery issues and is working constructively, in partnership with third parties, to resolve them with the aim of improving housing delivery. Where necessary, actions will be updated or new actions added in response to currently unforeseen issues or barriers to development, or as a result of changes in government policy, legislation or planning practice guidance. Close working relationships with infrastructure providers, developers and other key stakeholders will be key to ensuring a step change in increasing housing supply locally.

6.1.3 The key step going forward is to progress the emerging Local Plan to adoption. This will set an achievable housing target for the City which seeks to meet as much need as possible within the City's constrained island geography.

6.1.4 The updated Action Plan for addressing the above can be found in Appendix 1 of this report.

6.2 Next Steps

6.2.1 The Action Plan in Appendix 1 sets out a range of short and medium term actions which aim to increase the delivery of new homes in the City. It also identifies responsibilities for delivery of the actions, where appropriate. Monitoring of the actions will be undertaken annually following receipt of the annual HDT measurement, and the annual review of the Action Plan will draw on information from a range of sources including the annual housing completions surveys (which provide figures for the number of new homes completed each year) and other relevant documents.

Appendix 1: Portsmouth Housing Delivery Test Action Plan 2024 - 2025

Strategic Issue	Barrier to Delivery	Action	Department Responsible	Status
Development Management	While real improvements have already been made there is a need to ensure planning applications are determined within agreed timescales and provide an effective, efficient service.	Continuing pre-application discussions and Planning Performance Agreements on major development to help speed up determination times, as well as increase the quality of development. Wider use of Section 106 Unilateral Undertakings at the validation stage of applications to ensure that delays in application determination are minimised. Wider use of Section 111 agreements as an alternative to S106s, particularly for applications relating to Houses of Multiple Occupancy. Ensure team is fully resourced, including the Council's legal team. Alternatively make use of external consultants or legal firms to outsource the preparation of legal agreements.	City Development - Development Management	Ongoing
Housing Land Supply	Challenges delivering strategic site allocations from the adopted Local Plan (2012)	Continue to progress the emerging Local Plan, working jointly with landowners and promoters of emerging site allocation to resolve any outstanding issues as reflected in Statements of Common Ground.	City Development - Planning Policy	Ongoing
	Insufficient land available and suitable to meet housing need based on the Government's standard method due to the City's constrained island geography.	Continue to progress the emerging Local Plan, which has identified new sources of housing supply and was consulted on in summer 2024. This includes strategic sites, site allocations and sites identified from the Housing and Economic Land Availability Assessment (HELAA 2023). Update the HELAA on a regular basis. Update the Brownfield Land Register by 31 December on an annual basis.	City Development - Planning Policy	Ongoing
Development Viability and Delivery	Challenging viability on strategic site allocations, some requiring land assembly	Council to continue work on land assembly where necessary on strategic site allocations. Ongoing work with landowners and promoters to prepare and agree Statements of Common Ground on all strategic sites and sites allocations in the Local Plan to provide up to date evidence on viability and feasibility of individual sites.	City Development - Planning Policy	Ongoing

Strategic Issue	Barrier to Delivery	Action	Department Responsible	Status
	Changes to building regulations exacerbating viability	Work with potential developers on how to deliver development within the confines of building regulations without development becoming unviable.	City Development - Planning Policy and Development Management	Ongoing
Nutrient Neutrality	Need to provide nitrate mitigation	Following the update of the Interim Nutrient Neutral Mitigation Strategy, adopted in 2022, continued engagement and co-operation on appropriate longer term strategic solutions with PfSH and other partners, with a view to keeping costs of mitigation as low as possible to minimise impacts on viability.	PCC City Development - Planning Policy and other South Hampshire LPAs	Ongoing

End of document

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