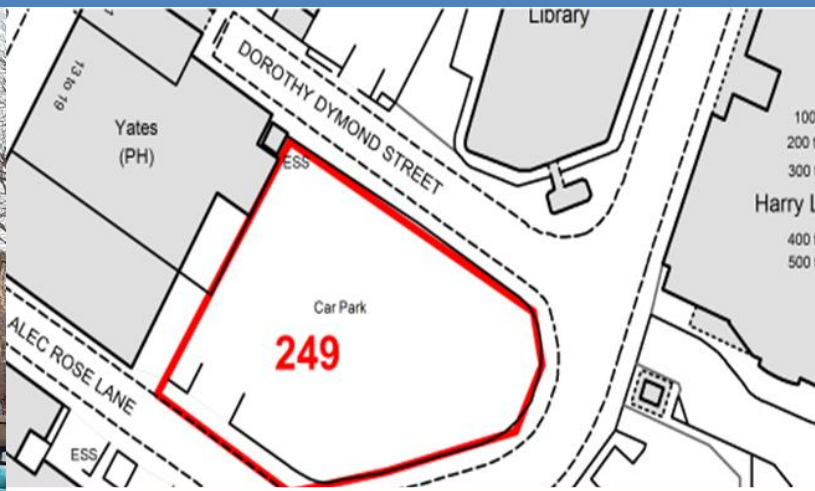


Housing and Economic Land Availability Assessment Methodology



October 2025

Disclaimer

The Housing and Economic Land Availability Assessment (HELAA) is part of the evidence base of the Local Plan. **Policy decisions are made through the Local Plan, not the HELAA.** In relation to the information contained within this report, its appendices and any other report relating to the findings of Portsmouth's HELAA, the City Council makes the following disclaimer, without prejudice:

- i. The identification of potential housing and economic sites, buildings or areas in the HELAA **does not state or imply that the City Council would necessarily grant planning permission for development.** Nor does identification in the HELAA automatically qualify the site for allocation for residential, employment or any other type of development. All planning applications will continue to be determined against the development plan and other relevant material considerations.
- ii. The HELAA has identified suggested yields for each housing and employment site¹ which has been included in the report. In arriving at these conclusions, officers have used professional judgement to arrive at an approximate estimation of a site's potential yield based on the information available to officers at the time. Consequently, the yields that have been identified in this report **do not mean that an exact or similar yield would necessarily be appropriate in a planning application.** Any application will continue to be assessed on its own merits, through the normal planning process.
- iii. The conclusions in the HELAA are based on information that was available at the time of the study. The City Council does not accept liability for any factual inaccuracies. Users of the study's findings should know that there may be additional constraints on some sites that were not identified at the time of the survey. Consequently, **planning applications will continue to be treated on their own merits** at the time of the planning application and not on the information contained in the HELAA. Likewise, some of the identified constraints may have been removed since the information was compiled. Issues may also arise during the course of a detailed planning application that were not identified at the time of the study. For example, the ground conditions of a site are not always fully known without intensive on site investigations. Applicants will therefore have to carry out their own analysis of a site in order to identify any constraints **and should not rely on any part of the findings in the HELAA to support an application.**
- iv. Economic conditions are susceptible to short and long term fluctuation, which can impact on the housing and employment market. Consequently, the availability of sites and the delivery of housing and employment sites are subject to short and long term variations in the economy and the housing market which it is not possible to accurately predict in this study. The HELAA will be updated on a regular basis and the most accurate economic predictions will inform these updates.
- v. The categorisation of sites in terms of when they may come forward is based on the views of officers and insight from the development industry at the time of the study's preparation. Circumstances or assumptions may change which could impact on a site's development. **The HELAA does not prevent planning applications being submitted on any sites identified in or excluded from the report at any time.**
- vi. The inclusion of potential housing or employment sites, buildings or areas in the study does not preclude them from being developed for any other purpose(s).
- vii. The boundaries that are attached to sites, buildings and areas are based on the information available at the time. The HELAA does not limit any extension or contraction of these boundaries for the purposes of a planning application.
- viii. The exclusion of sites, buildings or areas from the study (either because they never formed part of the HELAA or because they have been discounted) does not preclude the possibility of planning permission for residential development or economic uses being granted on them. It is acknowledged that sites will continue to come forward, particularly those below the threshold of five units for residential (this threshold is explained later in the report). Their exclusion from this study does not preclude the possibility of residential development on those sites.
- ix. The findings of each published report are only a 'snapshot' of information held at the time the report was compiled. Therefore, some of the information contained in the report will be subject to change over time.

Overall, sites identified in this report and its appendices have no additional planning status and inclusion in the HELAA does not imply a presumption of, and should not be inferred to give, planning approval for development on any site

¹ For the purpose of this document 'employment' is defined by the Use Class Order as offices (Egi), research and development (Egii), industrial processes (Egiii), manufacturing (B2) and storage and distribution (B8).

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1 Introduction

1.1 Context

- 1.1.1 The key purpose of the Portsmouth Housing and Economic Land Availability Assessment (HELAA) is to demonstrate the availability of sites for development, showing how land may be brought forward to meet local development needs. It incorporates the City Council's previous HELAA and Strategic Housing Land Availability Assessment (SHLAA) work.
- 1.1.2 This Methodology acknowledges the approach adopted by the Council in previous versions of the HELAA/SHLAA, but has now been updated in accordance with national policy and guidance. The previous HELAA Methodology was written in 2023 under the 2023 NPPF, this HELAA Methodology, prepared in 2025, has been prepared under the 2024 NPPF.
- 1.1.3 The need for the assessment arises from the National Planning Policy Framework (NPPF) which requires that Local Planning Authorities should prepare a HELAA. The NPPF (para 72) states that:

"Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for five years following the intended date of adoption; and*
- b) 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."*

- 1.1.4 The Government's Planning Practice Guidance (PPG) sets out further details relating to the methodology for preparing housing and economic land availability assessment. It advises that an assessment should:
- Identify sites and broad locations with potential for development;
 - Assess their development potential; and
 - Assess their suitability for development and the likelihood of development coming forward (the availability and achievability).
- 1.1.5 The HELAA is updated on a regular basis. It is kept up to date as part of the Council's monitoring activity, in accordance with national guidance, and, where applicable, will form part of the evidence for the preparation of any Development Plan Document.
- 1.1.6 As made clear in the disclaimer, it should be noted that the inclusion of sites in the HELAA does not allocate sites for development, grant planning permission, nor imply that planning permission would be granted. Any proposed development of a site must be considered against the policies in the Development Plan through the planning application process.

1.2 Geographical Area of the Assessment

- 1.2.1 Portsmouth City Council is a unitary authority located on the Solent. The City of Portsmouth includes Portsea Island with a wider suburban area on the mainland bordered by Portsdown Hill in the north and the neighbouring Boroughs and Districts of Gosport, Fareham, Havant,

and Winchester. As stipulated by the PPG (paragraph: 006 Reference ID: 3-006-20190722), the assessment covers the plan-making area, that is, all of the Portsmouth City Council area.

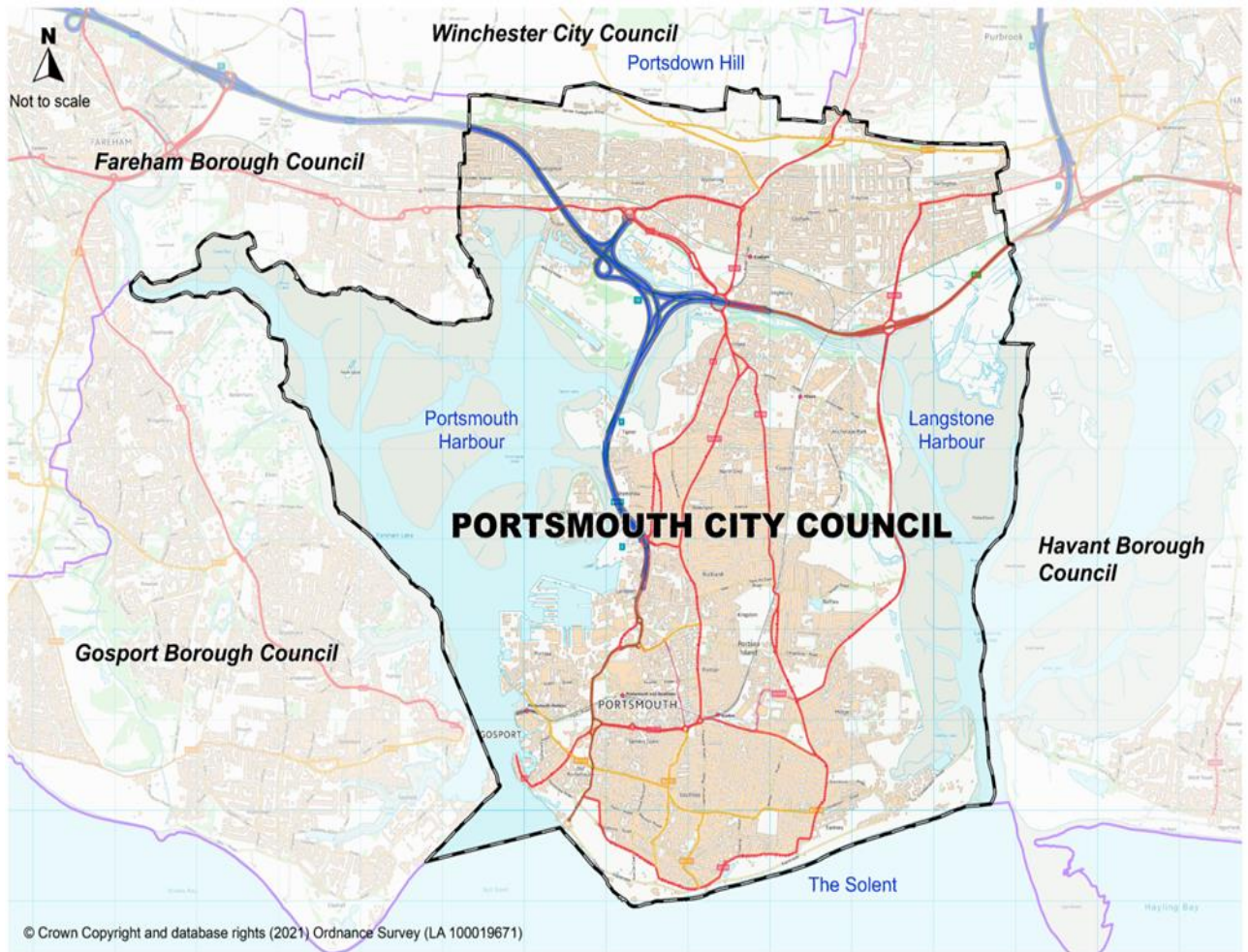


Figure 1: Area covered by the Housing and Economic Land Availability Assessment

2 Methodology

2.1 Introduction

2.1.1 The HELAA follows the methodology as set out in the National Planning Practice Guidance (PPG). The sections of this document follow each stage of the flowchart below, showing how the PPG has informed the assessment.

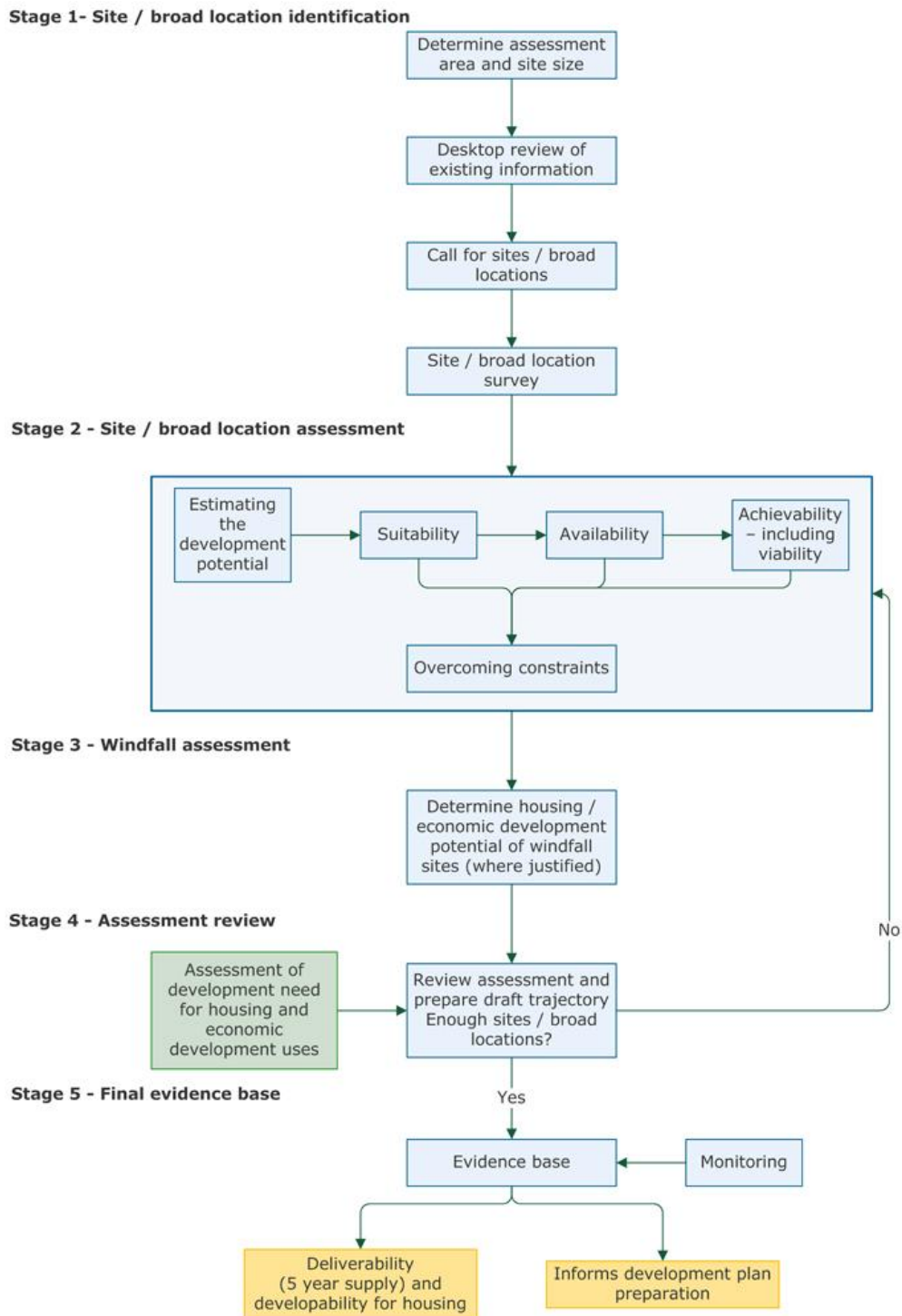


Figure 2: Housing and Economic Land Availability Assessment methodology (PPG)

3 Stage 1: Identification of sites and broad locations

3.1 Assessment area and site size

- 3.1.1 The HELAA covers the whole of the City of Portsmouth. As mentioned previously, it is informed by the Council's monitoring activity and will form part of the evidence for the preparation of the Portsmouth Local Plan.
- 3.1.2 The PPG (paragraph 009 Reference ID: 3-009-20190722) suggests a minimum site capacity threshold for potential housing sites of five or more dwellings, therefore, a net yield figure of five units or more is used. Professional judgement is used to determine potential site capacity, including consideration of the number of storeys neighbouring buildings have.
- 3.1.3 A lower threshold than five risks too many sites being put forward for assessment, making it difficult to identify genuine opportunities - for example many larger dwellings could be capable of being subdivided into two smaller ones. Smaller sites yielding 1-4 units may come forward as windfall sites (see Chapter 5 for details).
- 3.1.4 An analysis of past trends shows that if a higher threshold than five units is used, a significant proportion of the City's housing land supply would be overlooked. Consequently, a threshold of five units or more is deemed to be most appropriate. An exception to this is planning permissions. Sites with planning permission have been included even if they are below five units, so that supply from planning permissions is fully covered.
- 3.1.5 Regarding employment sites, the PPG recommends a threshold for sites of 0.25 hectares, which is able to accommodate 500 square metres of floor space and above. That is considered a reasonable threshold for the Portsmouth HELAA.

3.2 Desktop review of existing information

The PPG is clear that the study should identify as wide a range of sites as possible and should not be overly constrained by policy, as an important part of the review is to test the appropriateness of previously identified constraints. There should be a proactive search for sites rather than simply relying on known development sites. Notwithstanding this, the Council already has a large amount of information and knowledge of most of the sites being considered through previous work, chiefly:

- The adopted Portsmouth Plan 2012;
 - Adopted Area Action Plans and area-based Supplementary Planning Documents;
 - Existing and previous planning applications;
 - Area-specific master planning work for the City Centre, Tipner, Cosham and other areas conducted as part of local plan preparation or other strategic projects;
 - Sub-regional planning work through the Partnership for South Hampshire (PFSH);
 - Site specific project work and assessment of land owned by the City Council.
- 3.2.1 The PPG suggests a range of sources may be particularly relevant (paragraph: 011 Reference ID: 3-011-20190722). Table 1 is based on the table in the PPG which sets out each of the potential types of site, the suggested potential data sources, with the addition of the data sources that will be used for the Portsmouth HELAA.

Table 1: Type of site, potential data source and PCC approach

Type of site	Potential data source (PPG suggestions)	Data source for PCC HELAA
Existing housing and economic development allocations and site development briefs not yet with planning permission	- Local and neighbourhood plans - Planning applications records - Development briefs	- Adopted Development Plan Documents, including Area Action Plans - Made Neighbourhood Plans - Draft Site Allocations Plan work (not progressed)
Planning permissions for housing and economic development that are unimplemented or under construction	- Planning application records - Development starts and completions records	Hampshire County Council (HCC) land supply schedule
Planning applications that have been refused or withdrawn	Planning application records	HCC land supply schedule PCC records
Land in the local authority's ownership	Local authority records	- Discussions with PCC departments, including: Estates, Property, Housing, and Strategic Developments teams - PCC land ownership mapping
Surplus and likely to become surplus public sector land	- National register of public sector land - Engagement with strategic plans of other public sector bodies such as County Councils, central government, National Health Service, policy, fire services, utilities providers, statutory undertakers	- Informed discussions with Defence Infrastructure Organisation (DIO - Ministry of Defence), Portsmouth NHS Trust, and all other identified public bodies. - Engagement conducted through One Public Estate
Sites with permission in principle, and identified brownfield land	- Brownfield land registers (parts 1 and 2) - National Land Use Database - Valuation office database - Active engagement with sector	- Brownfield land register - Developers Forum
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)	- Local authority empty property register - English House Condition Survey - National Land Use Database - Commercial property databases (e.g.	- Interrogation of the National Land Use Database return. - HCC Land Availability Monitoring System interrogated for office - residential changes to date

Type of site	Potential data source (PPG suggestions)	Data source for PCC HELAA
	- estate agents and property agents) - Valuation Office database - Active engagement with sector	
Additional opportunities in established uses (e.g. making productive use of under-utilised facilities such as garage blocks)	- Ordnance Survey maps - Aerial photography - Planning applications - Site surveys	- Discussions with PCC departments, including Estates, Property, Housing, and Strategic Developments teams - Commissioned evidence base studies for new plans and strategies
Business requirements and aspirations	- Enquiries received by local planning authority - Active engagement with sector	- Discussions with PCC departments - Call for Sites submissions from landowners, developers and agents - University of Portsmouth Masterplan
Sites in rural locations	- Local and neighbourhood plans - Planning applications - Ordnance Survey maps - Aerial photography - Site surveys	- These site types are not applicable to Portsmouth with the exception of 'Large scale redevelopment and redesign of existing residential or economic areas'. - Discussions with PCC departments - Made Neighbourhood Plans.
Large scale redevelopment and redesign of existing residential or economic areas		
Sites in and adjoining villages or rural settlements and rural exception sites		
Potential urban extensions and new free standing settlements		

3.3 Call for sites

3.3.1 The PPG (paragraph: 012 Reference ID: 3-012-20190722) stipulates that a Call for Sites should be conducted at Stage 1 of the HELAA process.

3.3.2 Previously, Call for Sites exercises were undertaken in summer 2016, summer 2018, autumn 2019 and winter 2021/22. The most recent Call for Sites exercise was conducted in spring 2025. Major landowners and agents active in the City were contacted, as well as relevant individuals who had previously expressed an interest through previous Planning Policy consultations. The details of the consultation were placed on the Council's website and LinkedIn page. Key information on specific aspects, such as size of site, current use, proposed scale of development was sought from respondents in a consistent manner. The approach for future Calls for Sites will remain largely consistent with past practice.

3.3.3 Sites submitted to previous Calls for Sites are retained in the Council's site database for completeness, but continued availability is checked each time the HELAA is updated. For each update of the HELAA, any sites that were included in the previous published version will be the starting dataset that comprises the sites to be surveyed in Stage 1. Any sites from a previous HELAA where continued availability is not apparent will be discounted at Stage 1.

- 3.3.4 Any new site that is received after a Call for Sites submission period has closed may not be considered in the next publication of the HELAA, but will be assessed in the subsequent iteration.

3.4 Site/broad location survey

- 3.4.1 All the sites that are identified through the above processes will be collated and mapped to first identify any duplication of sites. All the sites will then be individually reviewed through an initial desktop review to determine whether they proceed to Stage 2 for further detailed assessment.
- 3.4.2 Stage 1 (and the corresponding Table to be included in the HELAA) results in the following outputs:
- Sites outside the scope of the HELAA (Table 2A)
 - Sites with planning permission (Table 2B)
 - Sites discounted at Stage 1 as unsuitable or unavailable (Table 2C).
 - Sites taken forward to Stage 2.

Table 2A - Sites outside the scope of the HELAA

- 3.4.3 Table 2A below sets out the threshold criteria to be applied in the first instance to rule out sites that are outside of the scope of the HELAA and are therefore not taken forward to stage 2.

Table 2A: Sites outside the scope of the HELAA - Criteria to be applied		
Category	Reason(s)	How it will be identified
Sites with capacity for less than 5 dwellings for residential	Threshold for HELAA eligibility not reached (in accordance with the PPG). Sites of less than 5 dwellings will be assumed to form part of the windfall figure for housing.	Developer / landowner information. Where the capacity of the site has not been identified by the landowner/site promoter, or is not considered to be a realistic estimate, professional judgement is used to determine site capacity and eligibility for assessment for residential development. Given the nature of the City, with many brownfield sites, and areas of high density, a standard approach is not considered appropriate, so sites are assessed on a site-

Table 2A: Sites outside the scope of the HELAA - Criteria to be applied		
Category	Reason(s)	How it will be identified
		by-site basis, using professional judgement.
Sites under 0.25ha (or capacity for 500sqm of floor space) for economic development	Threshold for HELAA eligibility not reached (in accordance with the PPG).	Developer / landowner information. For employment uses where no plot size or ratios are provided, or those proposed are considered unrealistic, professional judgement is used to estimate potential site capacity in terms of employment floorspace.
Sites (including sites previously considered in the HELAA) that have fully implemented planning permission and development has been completed	Sites where planning permission has been implemented for housing and/or employment development and have been fully built out as at the base date for the most recent monitoring year will not be in the scope of the purpose of the HELAA.	Completions data Site visits where necessary

Table 2A: Sites outside the scope of the HELAA - Criteria to be applied		
Category	Reason(s)	How it will be identified
Sites (including sites previously considered in the HELAA) that are wholly within a wider promoted site boundary	To avoid duplication of site areas. Sites falling into this category will be signposted to the new site within which the original site now sits within.	Mapping data Landowner/developer information
Sites (including sites previously considered in the HELAA), usually covering a wide area, that are more appropriate to be rationalised into separate component sites	Certain sites may be owned/controlled by multiple parties, and therefore it may be appropriate to separate out its component land parcels to assess whether these would have potential to come forward for development in isolation. Sites falling into this category will be given new reference numbers and be assessed separately rather than as one single site.	Mapping data Landownership data

Table 2B - Sites with planning permission

- 3.4.4 Whilst the HELAA records sites with planning permission, it is not necessary to provide a detailed assessment of these as it is considered that these sites have been thoroughly and publicly assessed and found to be suitable, available, achievable and deliverable for the specified uses and yields. An exception to this is outline planning permissions for major development. As the PPG (paragraph 007 Reference ID: 68-007-20190722) indicates that outline planning permissions for major development require further evidence to be considered deliverable, those permissions will be subject to detailed assessment in Stage 2. Another exception is where permission has been granted for a part of a HELAA site, but not its entirety. In this instance, the site continues to be assessed as a whole at Stage 2, but the permission is noted in the proforma in the planning history section.
- 3.4.5 Sites with pending planning applications which have yet to secure planning permission as at the end of the most recent monitoring year are subject to a detailed assessment in Stage 2.
- 3.4.6 Table 2B below sets out the criteria applied to sites that have planning permission. Whilst the PPG states that sites allocated in adopted Development Plan Documents do not need to be subject to detailed assessment, due to the age of the adopted Portsmouth Plan (2012), the approach taken in this HELAA has been to re-assess all extant allocated sites.

Table 2B: Sites with planning permission - Criteria to be applied		
Category	Reason(s)	How it will be identified
Sites with existing planning permission	Sites with extant planning permission (excluding outline planning permissions for major development) are generally considered to be deliverable for development.	Planning permission records and monitoring

Table 2C - Sites Discounted at Stage 1 as unsuitable or unavailable

- 3.4.7 The constraints in Table 2C have been identified as 'show-stoppers' that will fundamentally impact a site's suitability and/or availability; sites affected by these would not therefore, be considered deliverable/developable. Sites affected by these constraints are discounted at Stage 1 and are not subject to further assessment in Stage 2.

Table 2C: Sites Discounted at Stage 1 as unsuitable or unavailable		
Category	Reason(s)	How it will be identified
Availability Constraint		
Sites for housing and/or employment that are discounted due to fundamental availability reasons	As part of the Stage 1 survey, sites that are known not to be available or availability has not been confirmed will be discounted at Stage 1. This is because these sites cannot be considered deliverable/ developable in the absence of the site owner/controller of the site expressing a clear intention to make the site available. Letters will be written to the owners of all the potential HELAA sites and sites for which a positive answer is not received, or where it is not apparent from planning activity that the site is available, will be discounted from the HELAA process. Sites submitted in the most recent Call for Sites will be assumed to be available.	Landowner contact Officer knowledge
Suitability Constraint: Location/Use		
Existing employment sites put forward for housing use in whole or in the majority	Employment sites, particularly those in current use, will not generally be considered for housing unless it is deemed beneficial for this to take place for regeneration purposes, or the site is not fit for purpose for employment . The NPPF (paragraph 85) states that significant weight should be placed on the need to support economic growth and productivity.	GIS map Planning permission records Site visit
Suitability Constraints: Environmental		

Table 2C: Sites Discounted at Stage 1 as unsuitable or unavailable		
Category	Reason(s)	How it will be identified
Sites entirely within an area of flooding that has 3.3% or greater AEP (annual exceedance probability). This is defined in Appendix A, Figure 11 of the SFRA ²	The NPPF advises ³ that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. There is land in Portsmouth in Flood Zone 3b as Portsmouth is largely protected from flooding from the sea due to the presence of flood defences, but there are a few small areas where the AEP is 3.3% or greater.	Strategic Flood Risk Assessment
Sites including or within the immediate setting of heritage assets of the highest significance where development is likely to cause harm to those assets and is not likely to be capable of mitigation	Historical assets are protected by legislation. NPPF (paragraph 213) states that substantial harm to or loss of grade II listed buildings or registered parks and gardens, should be exceptional, and substantial harm to or loss of assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, and grade I and II* listed buildings and registered park and gardens, and World Heritage Sites, should be wholly exceptional.	GIS maps,
Protected nature conservation sites	Sites may be excluded due to the likelihood of development having an adverse effect on areas protected for nature conservation. This includes designated and potential Special Protection Areas (SPAs), Special Areas of Conservation (SACs), National Nature Reserves (NNR), Ramsar sites, Sites of Special Scientific Interest (SSSIs), Sites of Importance for Nature Conservation, Local Nature Reserves and Local Geological Sites.	GIS maps
Sites identified as Core or Primary sites for Solent Waders and Brent Geese	These are sites known to have a strong functional relationship with Chichester and Langstone Harbour SPA and Portsmouth Harbour SPA and the species it supports. Without mitigation,	GIS maps

² https://www.portsmouth.ghisov.uk/wp-content/uploads/2024/07/PfSH_PortsouthCity_Figure11_TidalFloodExtent3_3.pdf

Table 2C: Sites Discounted at Stage 1 as unsuitable or unavailable		
Category	Reason(s)	How it will be identified
	development of such sites would fail Appropriate Assessment under the Habitat and Conservation of Species Regulations. Where these form an area within a larger site, the site will not necessarily be discounted at Stage 1, instead it will be stipulated that these areas should be kept free from development.	

4 Stage 2: Site/broad location assessment

4.1 Estimating the development potential of sites (site capacity)

Housing sites

- 4.1.1 In order to assess the potential capacity of housing sites in the City a number of assumptions need to be made. The City Council is aware of the shortage of potential development land caused by the City's constrained island geography and is keen to increase densities wherever suitable. Within this context it is realised that individual sites will have specific opportunities / constraints which will affect their potential capacity.
- 4.1.2 Professional judgement is used to determine site capacity which is based on site specific assumptions. These site specific factors include but are not limited to:
- Surrounding setting, building heights, density and character (including historic environment);
 - Likely dwelling types to be accommodated (flats or houses for example);
 - Site's accessibility (including reduced need for provision of onsite parking).

Employment sites

- 4.1.2 The capacity of potential employment sites varies greatly dependent upon the types of employment use for which they are suitable, as different types of employment use have significantly different layout patterns and floor space provision. As with housing sites, professional judgement is used to determine site capacity for employment sites.

4.2 Assessing suitability, availability and achievability

- 4.2.1 Any sites that have not been considered by the City Council before are subject to a detailed survey to establish if the site is suitable, available, and achievable. This includes desk-based work and site visits to establish site area and current land use, the character of surrounding area, and environmental constraints. Sites already assessed in previous versions of the HELAA are re-assessed to check for any changes.
- 4.2.2 Suggested criteria for assessing suitability, availability and achievability are set out in the sections which follow. It should be noted that the criteria and associated questions listed below indicate a range of considerations for a high-level assessment of the sites. The identification of a potential constraint does not automatically result in a site being discounted for potential development, sites are only discounted at Stage 2 if constraints are unlikely to be possible to overcome.

4.3 Assessing Site Suitability

- 4.3.1 The PPG (para 018 Reference ID: 3-018-20190722) states that: *'a site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. [...] Plan-makers need to assess the suitability of identified sites or broad locations for different forms of development where appropriate, taking into account the range of needs for housing, economic and other uses.'*

- 4.3.2 In terms of assessing the suitability of sites for residential development, the PPG generally recommends including as wide a range of sites as possible. Within the City there is generally a presumption that housing and economic development is required to meet growth needs. However, due to the particular physical constraints of the City there is a need to strike a balance between competing uses such as ecologically sensitive sites, key employment areas which are central to the City's role as a place for people to work and high density sustainable housing.
- 4.3.3 These matters are not, however, a restrictive rule. For example, the Council acknowledges government guidance on reviewing the long term protection of employment land. In all cases, site specific considerations are taken into account, using Table 3A as guidance.

Table 3A - Site Suitability - Considerations at Stage 2	
Suitability	Biodiversity Is there a reasonable likelihood that protected species could be present? Could development have a potential impact on habitats or species of principal importance? Is it likely that Biodiversity Net Gain could be accommodated on site? Is there scope to adequately mitigate any potential impacts on protected areas, species or habitats? This will include consideration of the potential impact of new housing on Special Protection Areas and the consideration of opportunities to mitigate potential impacts (e.g. through provision of Suitable Alternative Natural Green Space (SANG)).
	Neighbouring Land Uses Is the site affected, or has the potential to be affected, by neighbouring development and current uses? For potential employment sites, are there other businesses located in close proximity and if so, do these businesses form a specific cluster, for example, Research & Development?
	Previous Use What is the previous use of the land? If the site is currently vacant, what was its last known use?
	Flood Risk Is the site located within Flood Zone 2 or 3a and/or at risk of surface water flooding? Is there a history of flooding?
	Ground Conditions/Topography Is the site affected by any ground conditions? (e.g. unstable ground, steep slopes etc.)
	Air Quality Is the site within or adjacent to an Air Quality Management Area (AQMA)?
	Land Contamination Is the site affected by any potential land contamination? Will land contamination severely affect deliverability of the site or is there potential for mitigation?
	Minerals and Waste

	Is the site within a Minerals Safeguarding Area or Mineral Consultation Area?
	Is the site located within 250 metres of a historic landfill site?
	Tree Preservation Orders
	Are there any Tree Preservations Orders on the site or on the boundary of the site?
	Archaeology
	Does the site have any archaeological potential which may require investigation prior to development or during construction?
	Listed Buildings/Heritage Assets
	Are there listed buildings or heritage assets within the site? Could development potentially adversely affect listed buildings or heritage assets?
	Conservation Areas
	Is the site within a Conservation Area? Could development potentially affect a Conservation Area?
	Public Rights of Way
	Are there any public rights of way running through the site or around the boundary of the site? Are there any potential views of the site from any public rights of way?

4.4 Assessing Site Availability

- 4.4.1 The PPG (paragraph 019 Reference ID: 3-019-20190722) states that a site is considered available for development when:

‘on the best information available (confirmed by the call for sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.’

- 4.4.2 For each site, ownership issues are considered and land searches undertaken where necessary to determine if this is likely to impede development from progressing. All landowners are contacted each time a HELAA is prepared to see if their HELAA site is still available for development. In all cases, the planning histories of sites are considered to see if there are permissions in place or indeed a history of unimplemented permissions, which may point to underlying factors which could prevent development in the future, or may indicate availability. This means that planning permissions on sites past the base date of the HELAA may be included in site proformas. Table 3B is used as guidance for considering issues relating to availability.

Table 3B - Site Availability - Considerations at Stage 2	
Availability	Ownership
	Is the site in a single or multiple ownership? Will multiple ownerships prevent land assembly and subsequent deliverability of the site as a whole or is there evidence of opportunities for a coordinated approach?

	Planning Status
	Is there other planning history which is relevant to the assessment? (e.g. pre-application enquiries, lapsed permissions)
	Intention to develop
	What timescale has the owner/promoter suggested development could come forward?
	Legal Constraints
	Are there any legal matters which may prevent the site from being available?

4.5 Assessing Site Achievability

- 4.5.1 As noted in the PPG (Paragraph: 020 Reference ID: 3-020-20190722), a site is considered achievable for development where there is a reasonable prospect that the particular type of development for which it has been promoted, will come forward at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.
- 4.5.2 It is considered impractical to undertake detailed viability assessments of all sites, and it is not a requirement of national policy or guidance to do so. A more general assessment approach is therefore undertaken, considering the general marketability of each site, potential abnormal development costs, and any land ownership issues which may constrain deliverability. The following factors are considered to determine achievability:

Table 3C - Site Achievability - Considerations at Stage 2	
Achievability	Landownership / access
	Is the site landlocked? / Is there a viable/existing access to the site, or the potential to create one? Would properties need to be demolished to allow for access? / Have these properties been secured etc.? Are there factors which would make access difficult e.g. trees under TPO blocking the potential access.
	Marketability
	Could the current use of adjoining sites impact on the marketability of the site? Is the location of the site likely to have an effect on the marketability of the site?
	Highways
	Could development on the site impact on the Strategic Road Network? Are there any potential highways issues associated with the site?
	Costs
	Site preparation costs and/or exceptional costs; Highways improvement works; Access issues; Third party land requirements; Availability and capacity of local utilities/ connection costs.
	Delivery factors
	Phasing / build out rates; Single or multiple developers; Legal agreements between landowners and/or developers; Is third party land required?

4.6 Overcoming Constraints

- 4.6.1 Constraints affecting each site are listed on the site proforma, and where it is not obvious how to overcome this, a suggestion is made on how to do this. Not all constraints will necessarily need to be overcome, but are highlighted for information.
- 4.6.2 There are two constraints which apply to the whole of Portsmouth which are not flagged in individual proformas as they apply to all sites. Firstly, nutrient neutrality is an issue across Portsmouth, and for permission to be granted for housing, a financial contribution is required to address this⁴. Secondly, sites within 5.6km of the SPA are required to make a financial contribution to the Bird Aware scheme in order to secure planning consent for housing⁵. All of Portsmouth is within 5.6km of the SPA.

4.7 Assessing Site Deliverability and Developability

- 4.7.1 The conclusions on the suitability, availability and achievability of sites are used to inform a judgement as to whether a site can be considered deliverable or developable over the plan period.
- 4.7.2 The NPPF definition (Annex 2: Glossary) of deliverable is as follows: *'To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:*
- a) *sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will no longer be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
 - b) *where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'*
- 4.7.3 To be considered developable under the NPPF (Annex 2: Glossary), *'sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.'* This applies to sites that are estimated to deliver development in years 6-15.
- 4.7.4 The assessment takes into account the factors in Tables 3A, 3B, and 3C above in terms of overcoming constraints, and calculating the development yield, which are material to the deliverability and developability of land.
- 4.7.5 Where sites are partly deliverable, that is part can be delivered in years 0-5, and partly developable, that is likely to be developed in years 6-15, sites are considered to be deliverable, but the delivery of elements beyond year 5 are not counted until the appropriate

⁴ <https://www.portsmouth.gov.uk/services/development-and-planning/planning/planning-policy/nitrate-mitigation-strategy/>

⁵ <https://www.portsmouth.gov.uk/services/development-and-planning-policy/solent-special-protection-areas>

time. For example, where a mixed use site has employment likely to come forward in years 0-5, and housing likely to come forward in years 6-10, whilst the site will be considered deliverable, the housing will not be counted in the first five years (so not counted in the five year housing land supply), it will be counted in years 6-10. Likewise for housing sites where part will be delivered in years 0-5 and part in years 6-10, only the dwellings likely to be delivered in years 0-5 will be counted in the first five years, and the remainder in years 6-10, but the overall site will be considered deliverable.

5 Stage 3: Windfall assessment

5.1 Introduction

Windfall sites are defined in the National Planning Policy Framework (Annex 2: Glossary) as: *'Sites not specifically identified in the development plan.'* Paragraph 75 of the NPPF states that *'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.'* The PPG (paragraph: 023 Reference ID: 3-023-20119072) states that *'Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance.'* The PPG only refers to windfall allowances in relation to housing, not economic development.

- 5.1.1 As sites from stage 2 can be allocated or identified in the Local Plan, that leaves sites which have not been considered in the HELAA which could potentially contribute towards a windfall allowance. The HELAA does not consider small sites with the capacity of less than 5 dwellings, therefore, sites of less than 5 dwellings can be considered as a potential source of windfall sites. The potential for windfalls from all sources: C3 development, C2 development, student accommodation (C2 and in some instances C1), and C4 and Sui Generis development for Houses of Multiple Occupancy (HMOs) need to be considered as these all contribute to housing supply in the City. The following section explores the potential for a windfall allowance.

5.2 Historic windfall delivery rates

- 5.2.1 In order to establish a potential windfall allowance, past completion rates from housing developments of less than five dwellings are considered below. Table 5 below sets out housing completions by size (1-4, 5-9, and 10 or more dwellings) over the period 2020/21-2024/25. Historic data for only the past five years (rather than a longer period) has been examined as monitoring of certain types of development, such as HMOs was still evolving before that, and so data from earlier years would not necessarily be consistent with recent data, making it difficult to compare with later data. The data used is completions data provided by HCC.

Table 5: Housing Completions(net) in Portsmouth 2020/21-2024/25 by scheme size

Monitoring Year	1-4 dwellings	5-9 dwellings	10 or more dwellings	Total
2020/21	34	54	221	309
2021/22	60	17	102	179
2022/23	67	15	-26	56
2023/24	119	53	209	381
2024/25	113	9	75	197
Total	393	148	581	1,122

Source: HCC

- 5.2.2 Data in Table 5 is all C3 or C3 equivalent. For student accommodation a ratio of 2.5 has been applied to completions for 2020/21 (2.5 bed spaces equal to 1 C3 dwelling), whereas a ratio of 2.4 has been applied to completions from 2021/22 onwards as the ratios were altered after the 2021 Census. For HMOs and C2 accommodation (non-student) a ratio of 1.8 has been applied to the figures for 202/21, whereas a ratio of 1.9 has been applied for 2021/22 onwards. Where applying the ratio resulted in a fraction of a dwelling, figures have been rounded down to the nearest whole C3 dwelling. Ratios used are based on those

recommended in paragraphs 10 and 11 of the Housing Delivery Test Measurement Rulebook⁶.

- 5.2.3 As can be seen can be seen in Table 5 above, small sites (1 to 4 dwellings) comprise 393 (35%) of the total completions in Portsmouth since April 2020. That is quite a significant amount and considered to represent compelling evidence for applying a windfall allowance. Taking an average of the five years of data, this equates to an average of 79 new dwellings per annum delivered on small sites of less than 5 dwellings, which would be a suitable windfall allowance to apply to the Local Plan.

5.3 Conclusion

- 5.3.1 It is considered that a windfall allowance of 79 **dwellings per annum** delivered through smaller sites represents a prudent estimate of delivery going forward, but one which is justifiable at the current time.

⁶ <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book#how-it-net-homes-delivered-calculated-the-numerator>

6 Stage 4: Assessment review

- 6.1.1 The PPG (Paragraph 24 Reference ID: 3-024-20190722) confirms that once all the sites and broad locations have been assessed, the development potential of sites can be collected to produce an indicative trajectory. This should set out how much housing development and economic development can be provided and at what point in the future (i.e. within years 1-5, 6-10, and 11-15 and beyond).
- 6.1.2 The PPG (paragraph 25 Reference ID: 3-025-20190722) is clear that if insufficient sites are identified to meet needs, the assessment will need to be revisited:

“It may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need. In the first instance, strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites or changing assumptions about the development potential of particular sites to ensure these make the most efficient use of land. This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and City centres, and other locations that are well served by public transport.

If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate.”

7 Stage 5: Final Evidence Base

7.1 Data Outputs

- 7.1.1 As specified in the PPG (paragraph 026 Reference ID: 3-026-20190722), each HELAA published will comprise the following information as outputs:
- A list of all sites or broad locations considered, cross-referenced to their locations on maps;
 - An assessment of each site or broad location, including:
 - Where these have been discounted, evidence justifying reasons given;
 - Where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how barriers to delivery could be overcome and when;
 - An indicative trajectory of anticipated development, based on the evidence available.

7.2 Monitoring and Review

- 7.2.1 The Council will continue to accept new sites for the HELAA outside of the 'call for sites' process. However, there will be cut off dates for each publication of the HELAA, after which new sites will not be included in that publication, but will be assessed in any subsequent publication. The receipt of new sites and updated information will be regularly monitored in order to inform the next HELAA update.

7.3 Use of the HELAA

- 7.3.1 The HELAA is an important component of the evidence base for the preparation of any Development Plan Document. It is used alongside a suite of relevant technical reports and analysis, to inform the development strategy for Local Plans. Where applicable, the document can also be used as a starting point to identify available land for inclusion in Neighbourhood Plans (PPG paragraph 003 Reference ID: 3-003-20190722).

End of document

Planning Policy
Portsmouth City Council
Civic Offices, Guildhall Square
PO1 2AU

Planningpolicy@portsmouthcc.gov.uk

www.portsmouth.gov.uk



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