

HOUSING BACKGROUND PAPER

October 2025

**To support the
Portsmouth Pre-Submission Local Plan
2024
and
Portsmouth Pre-Submission Local Plan
Addendum 2025
combined**



Portsmouth
CITY COUNCIL

Executive summary

- This Housing Background Paper provides a clear, evidence-based rationale to support Strategic Policy PLP16: Housing Target from the Portsmouth Pre-Submission Local Plan Addendum 2025. Linked to this, the paper also provides evidence and justification for Development Management Policy PLP21: Residential Density from the Portsmouth Pre-Submission Local Plan 2024.
- The paper summarises the range of housing needs identified in the Housing and Economic Development Needs Assessment Update (2025), including appraisal of the outcome of the Government's standard method which generates a need of 1,019 homes per year to 2040.
- The paper explains that the Portsmouth Pre-Submission Local Plan 2024 and the Portsmouth Pre-Submission Local Plan Addendum 2025 combined allocate or identify all deliverable and developable sites, which have been comprehensively assessed for suitability, availability, and achievability in line with the Housing and Economic Land Availability Assessment methodology and national policy. Despite this, it is highlighted that the supply does not meet need as defined by the Government's standard method. The paper provides clear evidence to support the Portsmouth Pre-Submission Local Plan Addendum's capacity-based housing requirement of 11,369 new homes over the Plan period. This requirement takes forward the Local Plan's development strategy and responds to the City's development needs, land supply and constraints.
- In order to help increase housing delivery in the City, the paper details the ambitious approach taken to residential density for development of new homes, and provides evidence to support areas of high, medium and low density across the City.
- The results of Duty to Cooperate discussions in relation to other authorities helping to meet some of Portsmouth's unmet need are presented, with 800 homes being delivered by Fareham, and further homes being potentially delivered by Winchester.
- The paper identifies a robust five year housing land supply of 5.03 years from the anticipated date of the Local Plan's adoption in spring 2027. This is supported by the Housing Trajectory, covering the Plan period 2025 - 2040.

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1. Introduction

- 1.1 The purpose of this paper is to set out the evidence and justification behind the Portsmouth Local Plan housing requirement contained in Strategic Policy PLP16: Housing Target in the Portsmouth Pre-Submission Local Plan Addendum 2025. Linked to the housing requirement, the paper also considers the evidence behind Development Management Policy PLP21: Residential Density in the Portsmouth Pre-Submission Local Plan 2024.
- 1.2 The Portsmouth Local Plan has, since March 2025¹, been prepared and will be examined under the National Planning Policy Framework (NPPF) published in December 2024. The majority of this Housing Background Paper, therefore, relates to the December 2024 NPPF, and where references are made to the NPPF it should be taken as referring to the December 2024 version, unless otherwise specified.
- 1.3 The main evidence base documents discussed are: the Housing and Economic Development Needs Assessment (HEDNA, Dec 2023²), the Housing and Economic Development Needs Assessment Update³ (HEDNA Update, Oct 2025); and the Housing and Economic Land Availability Assessment (HELAA, Oct 2025⁴). These documents provide recently prepared, comprehensive and robust evidence sources that are drawn on throughout the paper.
- 1.4 This paper begins by considering housing need, continues by looking at sources of housing in Portsmouth in terms of supply and available land, followed by a section on housing density and the Duty to Cooperate. Setting the housing requirement is then considered, followed by a calculation of the five year housing land supply on adoption of the Local Plan, and the Housing Trajectory for the Plan period.

¹ Due to the deadline for transitional arrangements for submitting under the 2023 NPPF having been missed following on from a negative IROPI decision on the allocation at Tipner West and Horsea Island East.

² https://www.portsmouth.gov.uk/wp-content/uploads/2024/04/4-Portsmouth-HEDNA_Final-Report-Dec-2023-CONFIDENTIAL-1.pdf

³ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/Portsmouth-HEDNA-Update-Final-Report-October-clean.pdf>

⁴ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/HELAA-2025.pdf>

2. Portsmouth's Housing Need

2.1 Introduction

- 2.1.1 The first stage in establishing a housing requirement is to establish housing need. This section of the report looks at how the Council's housing need figure has been derived, first looking at national policy requirements, followed by findings from the Council's HEDNA (Dec 2023), and HEDNA Update (Oct, 2025).

2.2 National Policy Context

- 2.2.1 In paragraph 61, the NPPF sets out how to support the Government's objective to significantly boost the supply of new homes, stating that the overall aim should be to meet an area's identified housing need. To determine the minimum number of homes needed, the NPPF requires that strategic policies be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance (paragraph 62).

2.3 Evidence on Housing Need

- 2.3.1 This section sets out the evidence on Portsmouth's housing need. The main evidence base studies are the HEDNA (2023) and HEDNA Update (2025), which together provide up to date, robust and proportionate evidence to inform Portsmouth's emerging Local Plan.
- 2.3.2 The HEDNA (2023) contains, amongst other things, assessment and analysis of the following:
- Housing need in the context of the Government's old standard method⁵;
 - Demographic and housing stock baseline analysis; and
 - Housing market insight.
- 2.3.3 The HEDNA (2023) also provides comprehensive background information on the City's economic baseline, and projected growth and need for commercial, industrial and warehousing uses. Whilst this largely informs the Plan's employment development strategy and policies, the HEDNA (2023) analyses the link between economic growth and housing supply.
- 2.3.4 The HEDNA Update (2025) provides an update on housing need in the context of the Government's new standard method to reflect the fact that the Portsmouth Local Plan is now being submitted under the 2024 NPPF rather than the 2023 NPPF. It also updates the City's economic baseline information, concluding that *'the local economy is not putting upward pressure on housing in the city.'*

⁵ The old standard method refers to the standard method figures prior to December 2024.

2.4 The Standard Method for Assessing Local Housing Need

- 2.4.1 In 2018, the Government amended the NPPF and Planning Practice Guidance (PPG) to introduce a "standard method" for calculating housing need, which the NPPF and PPG state that local planning authorities should use for assessing needs. Under the 2023 NPPF, Portsmouth had been using the figure of 899 dwellings per annum as the standard method figure, which was the standard method figure at the time the HEDNA (2023) was published. In 2024, the Government amended the NPPF and PPG again to introduce a new standard method for calculating housing need which is stock-based, replacing previous versions of the standard method which were based on household projections. Both the old and new standard methods involve adjustments for affordability.
- 2.4.2 The new standard method uses a formula that incorporates a baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of homes expected to be planned for. This is an unconstrained assessment of the number of homes needed in an area, and does not produce a housing requirement figure (PPG paragraph: 002 Reference ID: 2a-002-20241212).
- 2.4.3 The HEDNA Update (2025) concludes that for Portsmouth, the standard method figure is 1,019 dwellings per annum. Portsmouth City Council therefore, concludes that its housing need figure is 1,019 dwellings per annum, which equates to 15,285 dwellings over the Plan period of 2025-2040⁶.

⁶ The Plan period was altered in the Portsmouth Pre-Submission Local Plan Addendum 2025 from 2020-2040 to 2025-2040 to reflect the passage of time, to avoid including several years in the past, and to start from the first full monitoring year the new standard method (published December 2024) applied. It also reflects that the standard method is forward looking, with the affordability ratio being the component of the formula that takes account past delivery.

3 Sources of New Homes in Portsmouth

3.1 Introduction

- 3.1.1 Having accepted the standard method figure of 1,019 dwellings per annum as the measure of housing need for Portsmouth, the next step is to establish if that need can be met. This section starts by looking at national policy on housing supply and land availability, considers the City's constraints, and continues by presenting the findings from housing monitoring data, and the HELAA (Nov 2025).

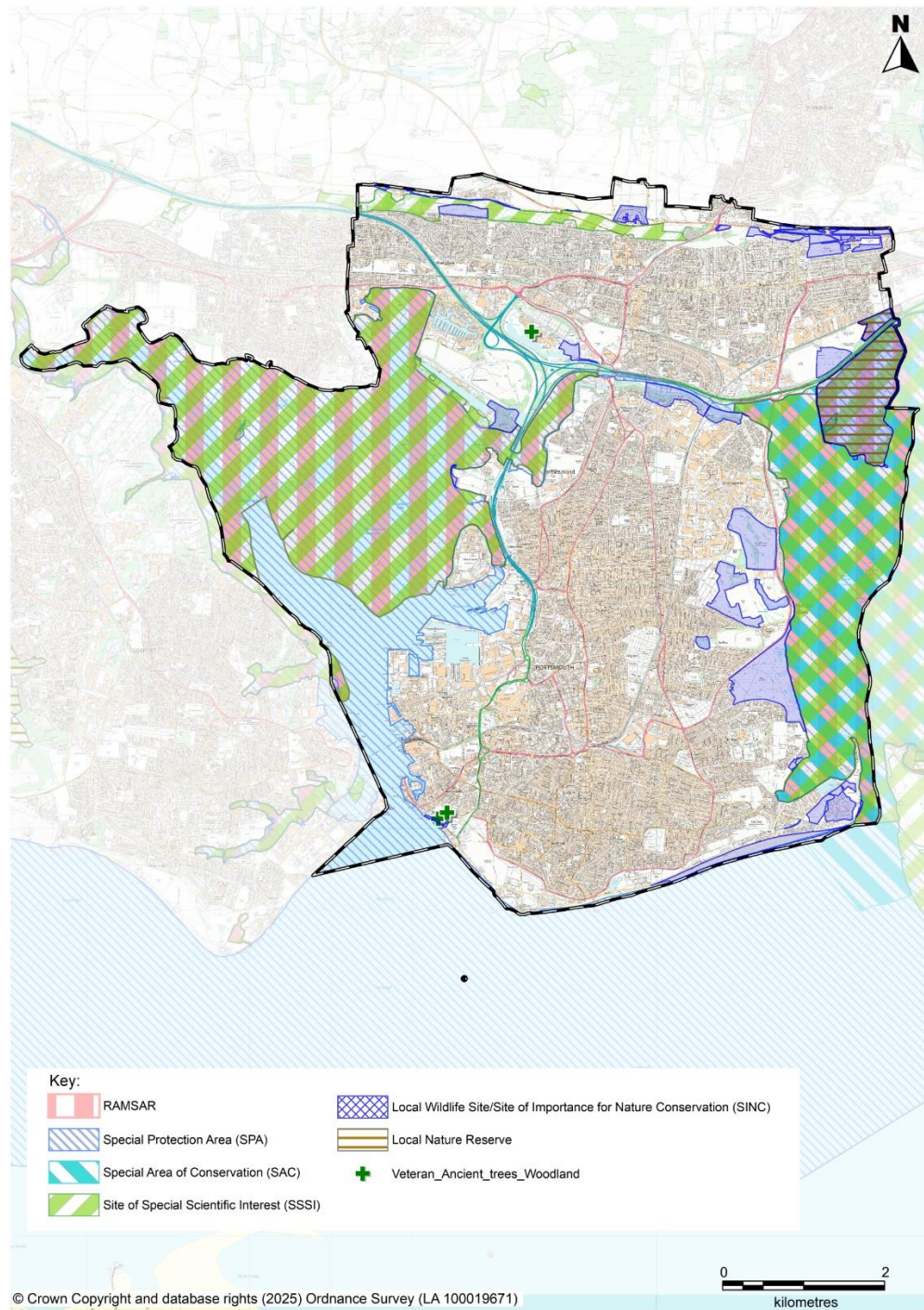
3.2 National Policy Context

- 3.2.1 In identifying land for new homes, the NPPF (paragraph 72) sets out that strategic policy-making authorities should have a clear understanding of land available in their areas, by preparing a strategic housing land availability assessment. This should identify a sufficient supply and mix of sites, taking into account availability, suitability and likely economic viability. The NPPF goes on to outline that a supply of specific, deliverable sites should be identified for the five years following the intended date of adoption of the Local Plan (plus an appropriate buffer); and specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.
- 3.2.2 The NPPF (paragraph 73) highlights that small and medium sized sites can make an important contribution towards meeting an area's housing requirement, and that to promote the development of a good mix of sites local planning authorities should *'identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.'* The same paragraph goes on to state that local authorities should: *'support the development of windfall sites through their policies and decisions.'*

3.3 Portsmouth City's Constraints

- 3.3.1 The City of Portsmouth is a highly constrained authority, which has a significant impact on land supply, and availability of land for development. The constraints to development include: the City's island geography, its nature conservation and heritage designations, contaminated land, flooding, and limited land availability due to its highly built-up nature (this includes a limited supply of open space which is why public open space is proposed to be protected from development under policy PLP45). These constraints are outlined in the wider evidence base for the Local Plan (including the Constraints Topic Paper which is currently in preparation), but some of the constraints (namely nature conservation designations and the built-up nature of the City) can be seen below in Figure 1 taken from Figure 9.2 of the Portsmouth Pre-Submission Local Plan 2024 as amended in the Schedule of Changes. Figure 1 also shows the lack of land left after excluding the existing built-up area and nature conservation designations.

Figure 1 Designated nature conservation sites in Portsmouth (taken from Figure 9.2 of the Portsmouth Pre-Submission Local Plan 2024 as amended in the Schedule of Changes)



3.4 Sources of New Homes

- 3.4.1 This section of the Background Paper sets out the evidence on potential for new homes in Portsmouth over the period 2025 - 2040. Housing supply in Portsmouth is monitored and based on a range of sources. The detailed monitoring of completions and permissions is carried out on an annual basis by Hampshire County Council in partnership with Portsmouth City Council, running from 1 April - 31 March. The outcome of the monitoring is summarised within the Authority Monitoring Report (AMR) which is published annually. The latest data available to inform the Portsmouth Pre-Submission Local Plan Addendum 2025 is for the 2024/25 monitoring year, so any completions or permissions which may have been granted after 31 March 2025 are not included in the figures below, as that data was not available to inform plan making. Supply data for the 2025/26 monitoring year will be published in the AMR in 2026, after the Local Plan has been submitted for examination. Local Plan housing figures can be updated through the course of the Local Plan examination if requested by the Inspector. Potential sources of new homes beyond the monitoring data are based on the HELAA.

3.5 Net Completions

- 3.5.1 As the plan period for the Portsmouth Pre-Submission Local Plan Addendum 2025 has moved (compared to earlier iterations of the Local Plan) to start in 2025 instead of 2020, there are no completions to consider at the time of writing this paper. As noted above, completions data for the monitoring year 2025/26 will be published in the AMR in 2026. Once the Local Plan is adopted, net completions will count towards meeting the housing requirement.

3.6 Land for Allocations

- 3.6.1 The HELAA is the Council's main evidence base study on available land within the City. The purpose of the HELAA is to demonstrate the availability of land for housing (and employment) development, showing how land may be brought forward to meet local development needs. The Council updates the HELAA on a regular basis, to ensure an accurate representation of land availability within the City. The most recent version of the Portsmouth HELAA is dated October 2025, but earlier versions of the HELAA have informed earlier stages of plan making prior to the Portsmouth Pre-Submission Local Plan Addendum 2025 being prepared.
- 3.6.2 The HELAA Methodology⁷ document (Nov 2025) is published separately to the HELAA itself, and sets out the approach adopted by the Council in detail, whereas the HELAA Report provides a comprehensive picture of the potential deliverable and developable housing and employment sites across the city, and indicates which sites have been discounted as neither deliverable nor developable. The HELAA includes sites put forward for development for Houses of Multiple Occupancy (HMOs) (use classes C4 and Sui Generis), student accommodation (use class C2 and in some cases C1), and other institutional accommodation (use class C2), as well as traditional dwelling houses (use class C3). The HELAA findings are a 'snapshot' of information held at the time it was compiled and has been prepared in accordance with national policy and planning

⁷ https://www.portsmouth.gov.uk/wp-content/uploads/2025/10/01-PCC_Housing-and-Economic-Land-Availability-Assessment_Methodology-v3.pdf

practice guidance. As noted in the HELAA Methodology (2025) document, the most recent "call for sites" was undertaken in April 2025.

3.6.3 As previously mentioned, Portsmouth is a highly constrained authority. Table 2C of the HELAA Methodology document lists the constraints considered at Stage 1 of the HELAA to be "show-stoppers" that fundamentally impact a site's suitability and/or achievability and therefore, cannot be considered deliverable or developable, these are listed below:

- site not available;
- site in existing employment site but put forward for housing use as a whole or in the majority;
- site entirely within an area of flooding that has 3.3% or greater AEP (annual exceedance probability) as defined in Appendix A, Figure 11 of the SFRA⁸;
- 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;
- sites entirely or the majority within protected open spaces as specifically designated and identified clearly in a made Neighbourhood Plan or Local Plan;
- sites within areas of significant nature conservation importance;
- sites identified as Core or Primary sites for Solent Waders and Brent Geese.

3.6.4 Appendix 1C of the HELAA lists the sites which were discounted at Stage 1. The most common reason listed is that the site is unavailable.

3.6.5 Sites which were not found to have any show-stopping constraints were assessed in detail in the Stage 2 assessment of the HELAA. Appendix 2 of the HELAA lists the sites which were discounted at stage 2 for being unsuitable, unavailable, and/or unachievable. A total of six potential housing sites were rejected at stage 2 in the 2025 HELAA. The reason each site was rejected is provided on each site's proforma, within Appendix 6 of the HELAA (2025).

3.6.6 The HELAA identifies 68 sites with potential for housing or mixed use with an element of housing development, either being deliverable or developable (excluding sites which already have planning permission). **All of these sites are identified in the Local Plan in some form, either as strategic sites, site allocations, or sites identified in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025.** Sites with significant capacity towards meeting identified housing need and offering multiple benefits over and above housing delivery were selected for allocation as "strategic sites" or "site allocations" as set out below, sites not offering multiple benefits over and above housing delivery were identified in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025, and are also set out below. Further information on the strategic sites and allocations and the site selection methodology is provided in the Allocations Topic Paper⁹.

⁸ https://www.portsmouth.gov.uk/wp-content/uploads/2024/07/PfSH_PortsouthCity_Figure11_TidalFloodExtent3_3.pdf

⁹ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/>

3.7 Strategic Sites

- 3.7.1 Five strategic sites that include housing are proposed for allocation in the Portsmouth Pre-Submission Local Plan 2024 and the Portsmouth Pre-Submission Local Plan Addendum 2025 combined. Together, these are anticipated to accommodate 6,379 dwellings. This is broken down by site in Table 1 below:

Strategic Site Name	No. of dwellings (net)
Tipner West	1,000
Tipner East	1,056
City Centre	3,458 ¹⁰
Fratton Park & Pompey Centre	460
St James' and Langstone Campus	405
Total	6,379

- 3.7.2 In early 2025, Portsmouth City Council decided to amend the Portsmouth Pre-Submission Local Plan 2024 and prepare an Addendum in a large part to avoid adverse impacts on nature conservation sites which cannot be mitigated. The new allocation at Tipner West had a revised housing figure and the regionally significant marine hub was removed. The figure for the City Centre allocation was amended to reflect updated information on completions, and site availability concerning the HELAA sites making up that allocation, and a more up-to-date figure for the City Centre North element of the allocation (which is now a range from 1,600-2,300). The figure for Fratton Park & the Pompey Centre was amended to reflect a change in ownership of part of the site, and associated lack of clarity over availability of that part of the site for housing. The figure for St James' and Langstone Campus was not changed overall, but was presented differently to show the figure excluding the 12 dwellings which had been completed prior to the plan period starting (prior to 1 April 2025).
- 3.7.3 All of the strategic sites are over one hectare in size.

3.8 Site Allocations

- 3.8.1 Five sites that include housing are proposed for allocation in the Portsmouth Pre-Submission Local Plan 2024 and the Portsmouth Pre-Submission Local Plan Addendum 2025 combined. Together the site allocations are anticipated to accommodate 1,512 dwellings. This is broken down by site in Table 2 below:

¹⁰ This is the lower end of the range for this allocation, the number of dwellings proposed is now from 3,468-4,158 in Policy PLP6: Portsmouth City Centre of the Portsmouth Pre-Submission Local Plan Addendum 2025.

Table 2 Site Allocations

Site Allocation Name	No. of dwellings (net)
Port Solent	500
St John's College	212
Fraser Range	134
The News Centre, Hilsea	100
Somers Orchard, Somerstown	566
Total	1,512

3.8.2 The number of dwellings proposed at Somers Orchard, Somerstown has been increased by 1 from 565 to 566, to reflect the number in the planning permission for the site.

3.8.3 All of the site allocations are over one hectare in size.

3.9 Deliverable Sites with Planning Permission at 31 March 2025 (excluding Strategic Sites and Site Allocations)

3.9.1 Deliverable sites with planning permission at 31 March 2025 include full or reserved matters permissions (without double counting of sites which have both outline and full consent), non-major (less than 10 dwellings) outline permissions, and prior approvals. Outline planning permissions for major developments (10 or more dwellings) are not included, and have instead been assessed through the HELAA. This is in line with the PPG (Paragraph: 014 Reference ID: 3-014-20190722) which states that: '*Sites which do not involve major development with any form of permission and all sites with detailed permission should be considered achievable within the next 5 years, unless evidence indicates otherwise.*' Sites which have been included as either a strategic site or allocation in the Portsmouth Pre-Submission Local Plan 2024 or the Portsmouth Pre-Submission Local Plan Addendum 2025 have not been included in these figures to avoid double-counting.

3.9.2 Data received from HCC for outstanding residential permissions as at 31 March 2025 was **833 net additional dwellings**. This is a combined figure of permissions from C3 development, C2 development, student accommodation (C2 and in some instances C1), and C4 and Sui Generis development for houses of multiple occupation (HMOs). Figures for student accommodation are adjusted based on a nationally set ratio of 2.4, derived from England Census data. Student figures are converted to a C3 dwelling equivalent figure on a 1: 2.4 bedspaces ratio, i.e. 2.4 student bed spaces are equivalent to 1 C3 dwelling. For other communal uses such as care homes and HMOs, the nationally set ratio is 1.9. Communal uses are converted to a C3 dwelling equivalent figure on a 1:1.9 bedspaces ratio, i.e. 1.9 care home bedspaces, or HMO bedspaces are equivalent to 1 C3 dwelling.¹¹

¹¹ Figures for ratios are taken from the Housing Delivery Test Measurement Rulebook: <https://www.gov.uk/government/publications/housing-delivery-test-measurement-rule-book/housing-delivery-test-measurement-rule-book#how-is-net-homes-delivered-calculated-the-numerator>

3.10 Deliverable Sites Identified in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025

3.10.1 After sites offering multiple benefits over and above housing delivery had been proposed for allocation as either "strategic sites" or "site allocations", this left 7 sites remaining from the HELAA as having been assessed as "deliverable". These do not offer multiple benefits over and above housing delivery and are not considered large enough to require a site allocation which would warrant an accompanying site-specific policy. So, instead of being allocated, these sites have been "identified" for development in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025 (which replaces the lists which were included in Appendices 2 and 3 of the Portsmouth Pre-Submission Local Plan 2024). Identifying these, mainly smaller sites, helps to ensure that small and medium sized sites contribute towards meeting Portsmouth's housing requirement. It should be noted that these sites only include sites for 5 or more dwellings as this is the threshold for inclusion in the HELAA.

3.10.2 Table 3 below lists the deliverable sites identified in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025. The size of each site is provided in order to assess which sites are less than one hectare in size. Size information is used to demonstrate the extent to which the requirement of NPPF paragraph 73a) has been met, that is, to identify, through the development plan, land to accommodate at least 10% of the housing requirement on sites no larger than one hectare.

Table 3 Deliverable sites identified in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025

HELAA 2023 Site ref.	Site Name	Area (ha)	0-5 years	6-10 years	11-15 years	Total net dwellings
COP01	Brynwell Builder's Yard, 207-217 Copnor Road	0.10	25	0	0	25
COS01	Cosham Health Centre, Vectis Way	0.33	70	0	0	70
CS06	227-231 Goldsmith Avenue	0.09	25	0	0	25
EC14	Eastney Swimming Pool and part of Southsea Leisure Park	0.88	6	0	0	6
FR06	St Wilfrids Church, 49 George Street	0.09	8	0	0	8
MI07	185-191 Highland Road	0.04	8	0	0	8
ST03	Open space at Stone Street	0.28	18	0	0	18
TOTALS			160	0	0	160

3.10.3 As can be seen from Table 3 above, a total of **160 dwellings are identified from deliverable sites** in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025. All of these sites are less than one hectare in size.

3.11 Developable Sites Identified in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025

3.11.1 After having considered Deliverable sites from the HELAA, that left 38 sites remaining as having been assessed as "developable". These do not offer multiple benefits over and

above housing delivery and it has not been considered necessary to specifically allocate these sites via a site-specific policy. So, like the sites classified as "deliverable" instead of being allocated, these sites have been *identified* for development in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025 (which replaces the lists which were included in Appendices 2 and 3 of the Portsmouth Pre-Submission Local Plan 2024). Identifying these, mainly smaller sites, helps to ensure that small and medium sized sites contribute towards meeting Portsmouth's housing requirement. It should be noted that these smaller sites only include sites for 5 or more dwellings as this is the threshold for inclusion in the HELAA.

- 3.10.4 Table 4 below lists the developable sites identified in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025. The size of each site is provided in order to assess which sites are less than 1 hectare in size. Size information is used to demonstrate the extent to which the requirement of NPPF paragraph 73a) has been met, i.e. to identify, through the development plan, land to accommodate at least 10% of the housing requirement on sites no larger than one hectare (ha).

Table 4 Developable sites identified in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025

HELAA 2023 Site ref.	Site Name	Area (ha)	0-5 years	6-10 years	11-15 years	Total net dwellings
BA01	Coniston Avenue	0.28	0	11	0	11
BA02	West of Milton Road	0.19	0	0	8	8
CD01	Wardroom	2.71	0	200	0	200
CD04	The Invincible, Wickham Street	0.03	0	40**	0	40**
CD07	Bridge Centre, Fratton	0.38	0	115	0	115
CD10	Maxstoke Close Car Park	0.12	0	5	0	5
CD15	Hertford Place	0.16	0	17	0	17
CD35	42 Kent Street, Groundlings Theatre	0.12	0	20	0	20
CD65	117-127 Fratton Road	0.18	0	30	0	30
CD75	Venture Tower Fratton Road	0.09	0	41*	0	41*
COS03	Westmoors 50 London Road Cosham	0.07	0	10	0	10
COS04	Former Cosham Police Station	0.28	0	60	0	60
COS05	Clock House, Spur Road	0.08	0	18*	0	18*
DF02	Karen Avenue	0.45	0	6	0	6
EC02B	Land at Halliday Crescent	0.03	0	5	0	5
EC11	Southsea Marina	4.49	0	12	0	12
HI01	Hilsea Lodge (Highgrove)	0.48	0	34	0	34
HI02	Land of former supermarket, Stubbington Avenue	0.18	0	20	0	20
HI04	Land at Pompey Health and Fitness	6.89	0	10	0	10
HI13	Territorial Army Centre, Peronne Road	0.7	0	0	28	28
MI05	Goldsmith Avenue	0.33	0	0	20	20

HELAA 2023 Site ref.	Site Name	Area (ha)	0-5 years	6-10 years	11-15 years	Total net dwellings
NE01	Connect Centre	0.53	0	191	0	191
NE03	Former Police Station, Kingston Crescent	0.41	0	60	0	60
NE05	205 London Road	0.02	0	5	0	5
NE06	Blue Anchor PH, 2 London Road	0.03	0	6	0	6
NE09	98 London Road	0.18	0	30	0	30
NE22	Land at Heathfield Road	0.08	0	18	0	18
PA03	140 Southampton Road	0.16	0	20	0	20
PA16	Amenity Land off Newbolt Road and Bodmin Road	0.17	0	8	0	8
SJ04	61-63 Marmion Road	0.06	0	5	0	5
SJ12	82-88 Clarendon Road	0.04	0	20	0	20
SJ16	Wimbledon Park Sports Centre	0.23	0	30	0	30
SJ17	Queen's Hotel and Grosvenor Casino	0.95	0	104	0	104
ST01	City Records Office	0.35	0	45	0	45
ST02	Middle Street	0.24	0	163	0	163
ST04	Wightlink Car Park	0.35	0	0	60	60
ST07	Derelict Land, Warwick Crescent	0.04	0	14*	0	14*
ST12	Cathedral House	0.07	0	8	0	8
ST13	62 Middle Street	0.03	0	8*	0	8*
ST17	Clarence Pier	1.58	0	100	100	200
TOTALS			0	1489	216	1,705

*This is the C3 equivalent number of dwellings. A ratio of 2.4 has been applied due to proposals being for student accommodation.

**This is the C3 equivalent number of dwellings. A ratio of 1.9 has been applied due to the proposals being for HMO/coliving accommodation.

3.11.2 As can be seen from Table 4 above, a total of **1,705 dwellings are identified from developable sites**. Most of these are less than 1ha in size, but 4 sites are larger than one hectare.

3.12 Non-Implementation Rate

3.12.1 As not all planning permissions are implemented, and there is always some uncertainty relating to deliverable and developable sites from the HELAA, the Council has considered it appropriate to apply a non-implementation rate to the supply of sites from outstanding planning permissions, and sites classed as deliverable or developable from the HELAA. To establish an appropriate non-implementation rate to apply in Portsmouth, the implementation rates from permitted sites have been reviewed. Table 5 below shows the number of dwellings permitted by year, against the number of dwellings from those permissions which went on to lapse (note the date of lapsing would have been in a future year, but in order to compare like with like, the lapse data has been applied to the date the permission was granted rather than the date when it lapsed). Data from 2023/24 and 2024/25 has been excluded as permissions granted in those years remain in date, so have not had time to lapse as permissions generally last for 3 years. Outline permissions

have been excluded from the data as outline permissions cannot be implemented without having an associated reserved matters permission or similar.

Table 5: Housing implementation rates in Portsmouth 2015/16 to 2022/23

	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	Average % permissions lapsed per year (no. dwellings)
Permitted dwellings	1146	1498	612	250	56	474	460	187	
Lapsed permissions (no. dwellings)	19	14	22	61	16	90	370	19	
% permitted dwellings which have lapsed permissions	2%	1%	4%	24%	29%	19%	80%	10%	21%

3.12.2 The data from Table 5 shows a great variation in non-implementation across the different years, ranging from 1% to 80%. This is partly because this measures numbers of dwellings rather than numbers of permissions, so one large permission expiring can have a major impact on the figures. The figure is particularly high in 2021/22, for example, which was mostly due to two large permissions lapsing: 20/01464/FUL which was for 245 C3 equivalent dwellings, and 21/00026/PACOU which was for 113 dwellings. Implementation rates have been impacted by concerns surrounding nitrate pollution in the Solent, which put a hold on permissions being granted for a period, and then after the mitigation strategy was put in place, there was 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 is likely to have increased the level of permissions lapsing. General issues with viability across the City also has an impact on permissions lapsing.

3.12.3 Considering the data from Table 5 above, whilst the overall average is 21%, if the outlier in 2021/22 is excluded, that results in an average of 13% non-implementation rate. So it is more likely that a figure between 13% and 21% would be appropriate. A figure of 15% has been selected as the Council believes this to be a sensible approach based on the data available. This has been applied to outstanding planning permissions, and deliverable and developable sites from the HELAA. For outstanding planning permissions, a total of **125 dwellings (15% of 833) has been subtracted from the planning permissions outstanding at 31 March 2025 figures** for the Portsmouth Pre-Submission Local Plan Addendum 2025. This results in a figure of 708 dwellings from outstanding planning permissions.

3.12.4 As with planning permissions, a non-implementation rate of 15% has been applied to the deliverable sites identified from the HELAA. This equates to **24 dwellings (15% of 160) which have been removed from the supply of deliverable sites identified from the 2025 HELAA**. This results in a figure of 136 dwellings from deliverable sites.

3.12.5 A non-implementation rate of 15% has likewise been applied to the developable sites identified from the HELAA. This equates to **256 dwellings (15% of 1,705) which have been removed from the supply of dwellings from sites identified as developable from the 2025 HELAA**. This results in a figure of 1,449 dwellings from developable sites.

3.13 Windfall Allowance

3.13.1 Windfall sites are defined in the NPPF (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 IDL 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.'*

3.13.2 The Council's main mechanism for identifying and monitoring opportunities for future development is the HELAA. As sites from stage 2 of the HELAA 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 need to be considered as these all contribute towards housing supply in the City, therefore completions from the following types of developments have been considered: C3 development, C2 development, student accommodation (C2 and in some instances C1), and C4 and Sui Generis Development for Houses of Multiple Occupancy (HMOs).

3.13.3 In order to establish a potential windfall allowance, past completion rates from housing development of less than five dwellings have been considered in the HELAA 2025. Table 6 below sets out housing completions by size (1-4, 5-9 and 10 or more dwellings) over the period 2020/21 - 2024/25, taken from Table 5 of the HELAA Methodology document. 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 6: Housing Completions (net) in Portsmouth 2020/21 - 2024/25 by scheme size (no. of dwellings)

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	-21	101
Total	393	148	485	1,026

3.13.4 Data in Table 6 includes all C3 or C3 equivalents. 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.

3.13.5 As can be seen from Table 6 above, small sites (1 to 4 dwellings) comprise 393 (35%) of the total completions in Portsmouth since April 2020. That is a significant amount, and considered by the Council 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. A windfall allowance of **79 dwellings per annum** is therefore, proposed in the Portsmouth Pre-Submission Local Plan Addendum 2025, which equates to **1,185 dwellings over the plan period**.

3.13.6 The windfall allowance is to apply from the start of the Plan period rather than starting a few years into the plan period. This is justified by the fact that, unlike many other authorities, a large amount of the supply in Portsmouth comes from HMOs, many of which are created from converting existing buildings. These developments are often small (less than 5 C3 dwelling equivalent), and able to come forward very quickly, and so Portsmouth considers it reasonable to apply the windfall allowance from the start of the plan period as there is no reason to suggest delaying this to start later. Portsmouth City Council also takes the conservative approach not to include sites of 5 or more dwellings in the windfall allowance. If sites of 5 or more dwellings had been included, then counting windfalls so early in the Plan period may have been less appropriate.

3.14 Conclusions on Sources of New Homes in Portsmouth

3.14.1 Taking into account all of the elements of supply and available land discussed above, it was found that the total number of homes which could be delivered in Portsmouth over the Plan period was **11,369**. This is summarised below in Table 7, which is based on Table 6.1 from the Portsmouth Pre-Submission Local Plan Addendum 2025.

Table 7: Sources of new homes in Portsmouth

Source		No. of dwellings (net)
Net completions since 1 April 2025 (A)		0
Strategic Sites	Tipner West & Horsea Island East	1,000
	Tipner East	1,056
	Portsmouth City Centre	3,458
	Fratton Park & the Pompey Centre	460
	St James' and Langstone Campus	405 (417 gross)
Site Allocations	Port Solent	500
	St John's College	212
	Fraser Range	134
	The News Centre, Hilsea	100
	Somers Orchard, Somerstown	566
Deliverable Sites (excluding Strategic Sites)	Planning permissions outstanding at 31 March 2025	833
	Less 15% non-implementation	(-125)
	Deliverable sites identified in Appendix 2	160

and Site Allocations)	Less 15% non-implementation	(-24)
Developable sites (excluding Strategic Sites and Site Allocations)	Developable sites identified in Appendix 2	1,705
	Less 15% non-implementation	(-256)
Windfall allowance	Windfall allowance	1,185
Requirement for new homes in Portsmouth 2025-2040		11,369 (758 dwellings per annum)

3.14.2 As can be seen from Table 7 above, **the total number of homes which could be delivered in the plan period is 11,369, or 758 dwellings per annum (on average).** This is below the standard method figure for housing need of 15,285 or 1,019 dwellings per annum, equating to a shortfall of 3,916 dwellings over the plan period. On an annual basis this is a shortfall of 261 dwellings per annum below the standard method annual need figure of 1,019 dwellings per annum. Delivering 11,369 dwellings meets 74% of local housing need judged against the standard method.

3.15 Identified Land of Less than One Hectare

3.15.1 As noted previously, paragraph 73a) of the NPPF requires local planning authorities to identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. As the housing requirement as set out above is 11,369 dwellings, to meet the 10% requirement, 1,137 dwellings would need to be identified on sites of less than one hectare. Looking at the total number of dwellings from deliverable sites set out in Table 4 (which are all less than one hectare), and the total number of dwellings from developable sites set out in Table 5 (excluding the four sites which are more than one hectare in size), a total of 1,443 dwellings are identified on sites less than one hectare in size (and presented in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025), which exceeds 10% of the housing requirement. It is therefore, considered that the requirements of paragraph 73a) of the NPPF have been met.

4 Housing Density

4.1 Introduction

- 4.1.1 Having established that the standard method figure cannot be achieved in Portsmouth after exhausting all sources of supply, methods of how to potentially increase housing delivery have been considered. One way of increasing the level of housing delivered is to consider increasing density for new developments. This section sets out the rationale and supporting evidence for the approach to residential density standards in the Portsmouth Pre-Submission Local Plan 2024, which has resulted in the inclusion of Policy PLP21: Residential Density. This includes consideration of monitoring data used to inform the policy, and the Urban Characterisation Study¹² (Jan, 2025). This Housing Background Paper replaces the Housing Density Background Paper (2021). Increasing densities has been tested through City-wide spatial options for housing growth in the Sustainability Appraisal (SA). The approach set out in this background paper is what has resulted after the options in the SA have been tested. Density has obvious links with the delivery of tall buildings, which is covered in criterion 7 of Core Policy PLP1: Design, which covers how applications for tall buildings should be designed, and the associated Supplementary Planning Document.

4.2 National Policy Context

- 4.2.1 Paragraph 130 of the NPPF notes that:

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

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

¹² https://www.portsmouth.gov.uk/wp-content/uploads/2025/02/Urban_Characterisation_Study_2025-Update-of-March-2011-version.pdf

4.3 Current Approach to Housing Density in Adopted Portsmouth Plan (2012)

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

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

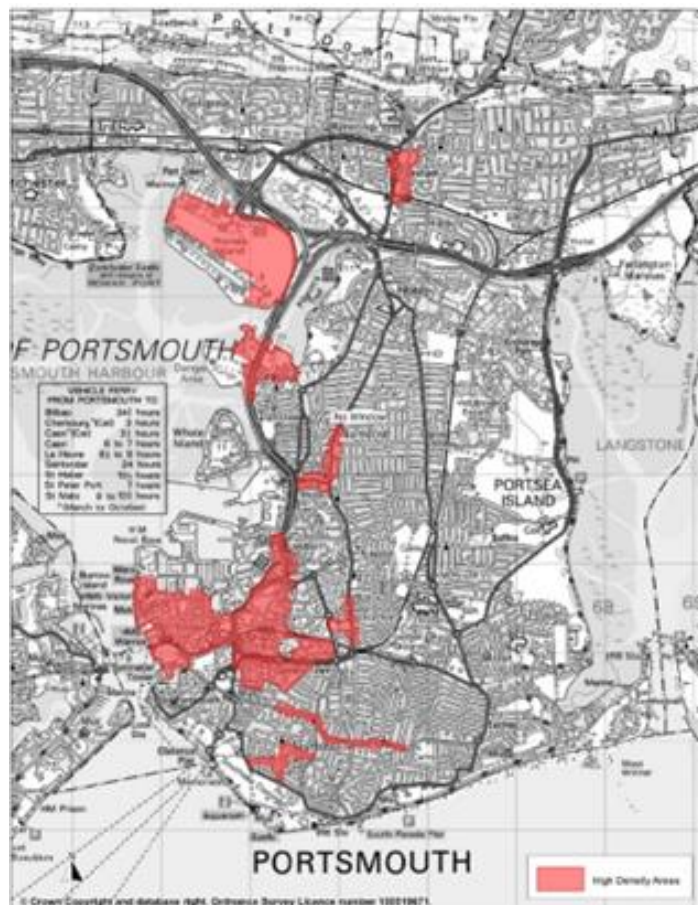
PCS21 housing density

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

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

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

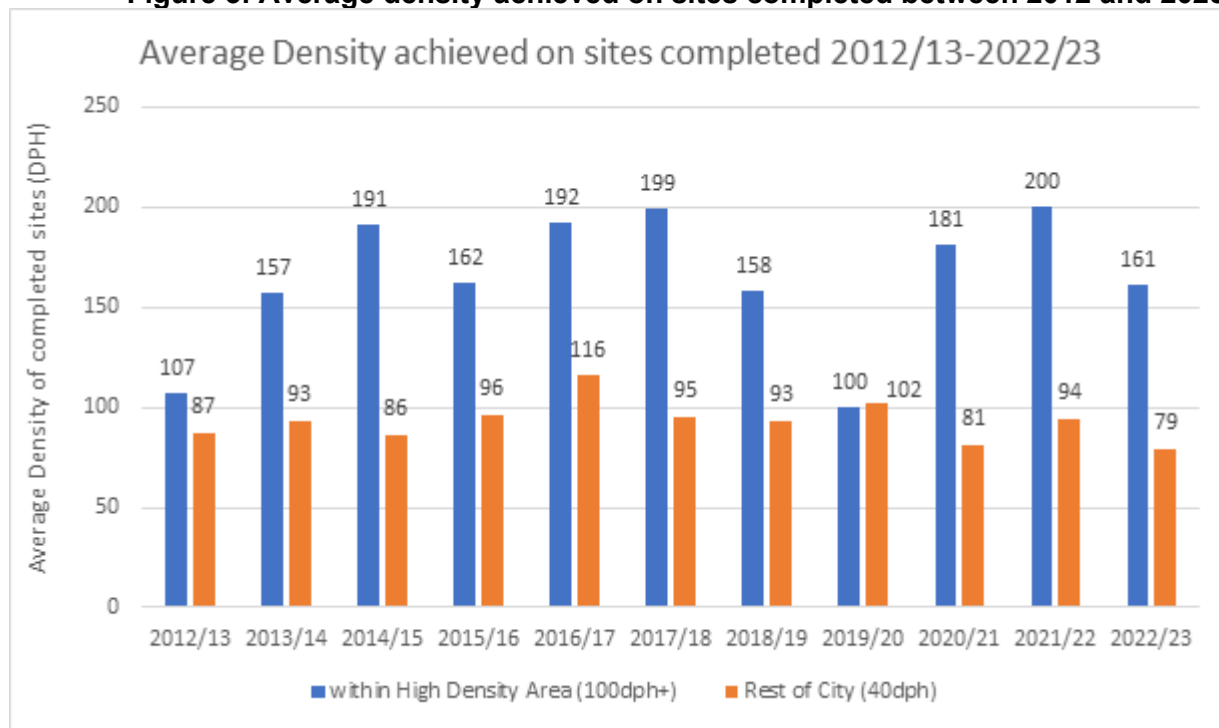
The council recognises that appropriate housing densities depend on various factors. The rationale for developing at different density levels to those outlined above should be made by the developer in an accompanying design and access statement.



4.4 Past Housing Densities

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

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

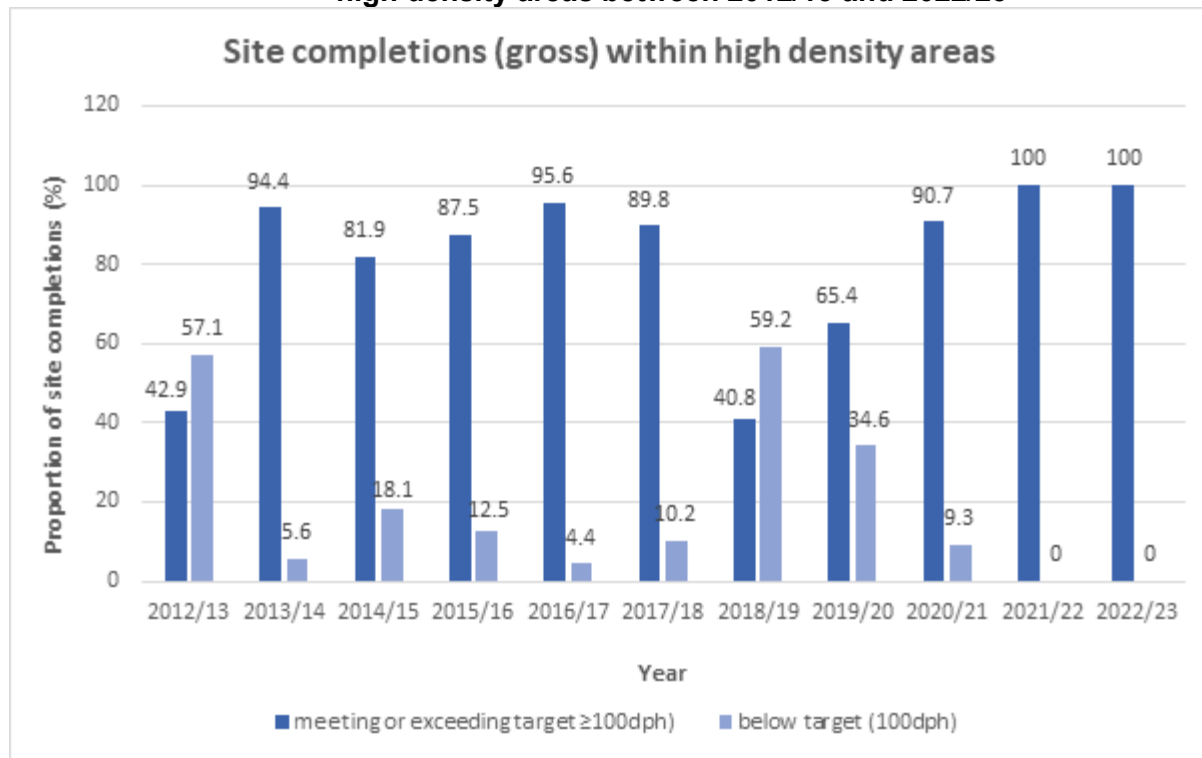


- 4.4.3 The data considering average densities achieved is helpful for understanding the overall picture across the City. However, it is acknowledged that each site's context and characteristics can influence the density that has been possible to achieve, so the next section considers completions, broken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

Completions within high density areas

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

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

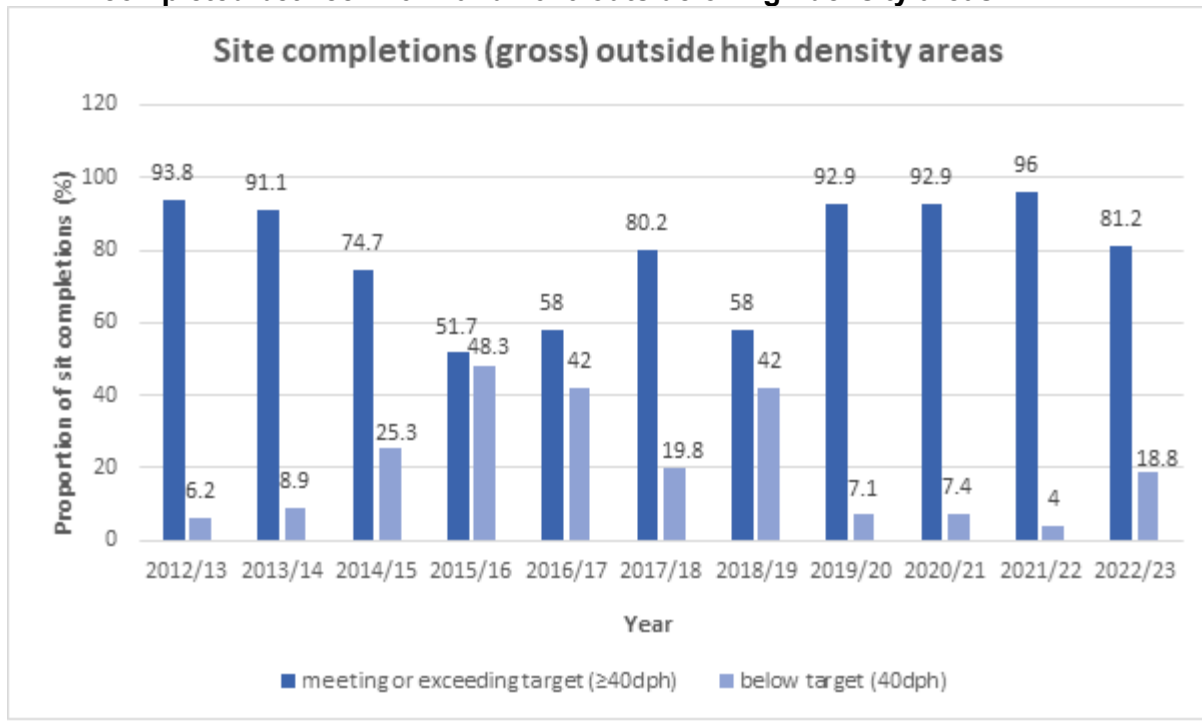


- 4.4.5 Within the defined high density areas, the mean average density figure of 165 dph achieved on sites completed between 2012/13 and 2022/23 was boosted by the majority of schemes meeting or exceeding the 100 dph target. During this period 69% of schemes delivered at or above the required 100 dph,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

Completions outside high density areas

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

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



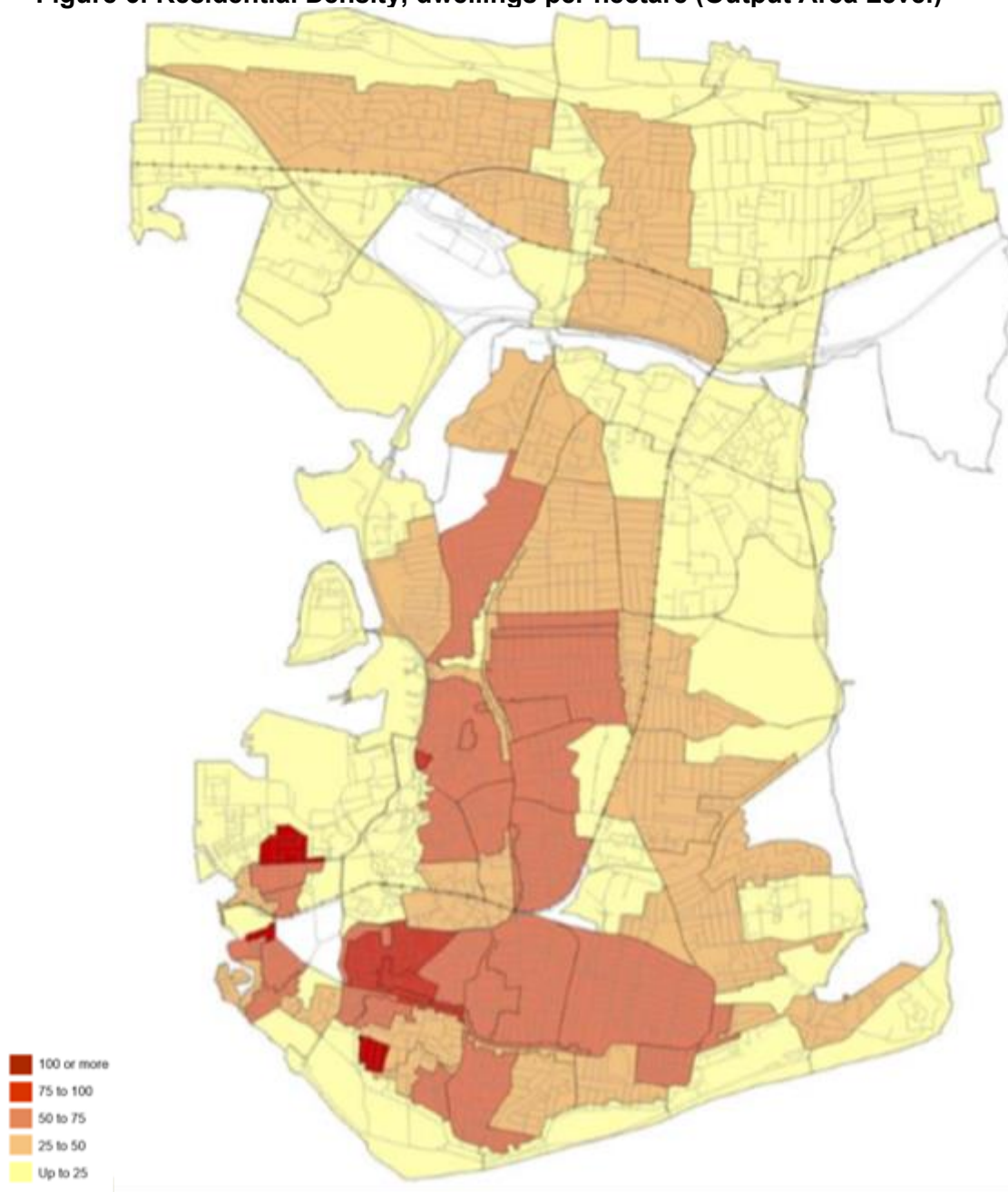
4.4.7 Between 2012/13 and 2022/23 the average density achieved across all sites outside of the high density areas was 93 dph, more than double the required minimum of 40 dph. Despite the high average densities achieved, there were still a number of schemes that failed to deliver the minimum target density.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

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

4.5 Existing Housing Densities

4.5.1 Figure 6 below shows the average dwelling density for the monitoring output areas in the City taken from the Urban Characterisation Study (Jan, 2025). These average densities include everything in the output area including non-residential uses, roads etc. which is why areas with significant open space and non-residential uses have lower average densities. Individual residential buildings / blocks will have densities higher than those indicated.

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



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

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

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

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

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

Figure 3: High Density



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

**Existing Medium Density Areas (Circa 50 -75dph) -
Urban Characterisation Study example**

Much of the Victorian city is characterised by tight terraces built to serve the workers at the dockyard and other major employment centres. These areas have little potential for further densification due to the tight nature of the street pattern. There are however potential densification opportunities in old industrial buildings in these areas as well as along main roads where demolition / conversion creates opportunities.

Figure 4: Medium Density



4.6 Areas with Potential for Higher Density Development

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

4.7 Proposed Policy Approach on Housing Density for Portsmouth

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

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

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

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

4.7.3 It is clear based on a review of data on how the Portsmouth Plan policy PCS21 has been implemented, that developments are not only already meeting the requirements of that policy, but are significantly exceeding them in many cases. It has therefore, been considered reasonable to propose a more ambitious density policy than PCS21 in the Portsmouth Pre-Submission Local Plan 2024.

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

4.7.5 To maximise density, policy PLP21 of the Portsmouth Pre-Submission Local Plan 2024 divides the City area into three broad density zones with an appropriate minimum density, as follows:

High Density: Highly Accessible Areas

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

Medium Density: Residential Core

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

Low Density: Suburban Edge

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

4.7.6 However, it is also recognised that appropriate housing densities depend on various factors, and that built form may be in part determined by urban design principles that combine layout, form and scale in a way that responds positively to its context. Policy PLP21 therefore, contains such caveats which will allow site specific constraints to be taken into account, though the applicant will likely need to provide additional information to justify a lower density in these instances.

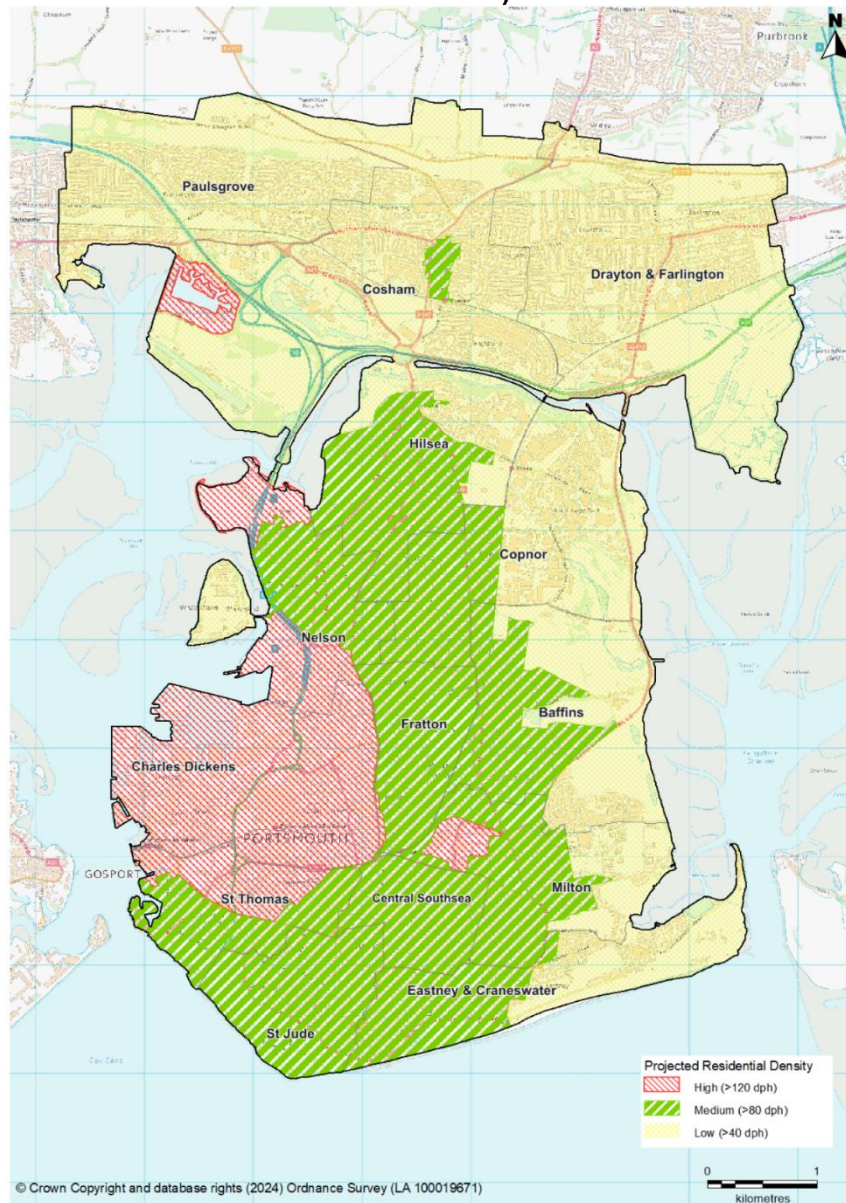
4.7.7 Policy PLP21 is shown below:

Development Management Policy PLP21: Residential Density

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

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

Figure 9: Proposed residential zones in relation to Policy PLP21: Residential Density (taken from Figure 6.1 of the Portsmouth Pre-Submission Local Plan 2024)



- 4.7.9 The proposed Development Management Policy PLP21: Residential Density in the Portsmouth Pre-Submission Local Plan 2024 sets density requirements at an ambitious level, with higher density requirements than existing adopted policy, with the aim of helping to increase housing supply in the City, whilst at the same time not adversely impacting on character.

5 Duty to Cooperate and Housing Numbers

5.1 Introduction

- 5.1.1 In this section, the Duty to Cooperate is considered in terms of housing numbers, and how this relates to Portsmouth's housing target. Full details of the Council's approach to the Duty to Cooperate is provided in the Council's Duty to Cooperate Statements¹³. These have been updated and published iteratively to support Local Plan consultations. A final version will be submitted along with the Local Plan for examination. This section starts by considering the national policy context, followed by setting out the context for Duty to Cooperate discussions. Details of joint working with other members of the Partnership for South Hampshire are then provided, concluding with a section outlining what commitments other authorities have made so far to help meet Portsmouth's unmet housing needs.

5.2 National Policy Context and Legislation

- 5.2.1 In addition to meeting the local housing need figure, the NPPF requires that any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. At paragraph 69 the NPPF sets out that: *'Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.'*
- 5.2.2 The Localism Act 2011 required local planning authorities to cooperate with neighbouring authorities on strategic matters that cross administrative boundaries, including housing delivery (the "Duty to Cooperate"). The duty to cooperate requirement is noted in the NPPF (paragraph 24), and national planning policy guidance, requires Statements of Common Ground (SCGs) to address strategic cross-boundary issues including housing need (Paragraph: 009 Reference ID: 61-009-20190315).

5.3 Context for Duty to Cooperate Discussions

- 5.3.1 Whilst the NPPF requires local authorities to consider how it can meet the unmet needs of its neighbours, as section 3 of this Housing Background Paper demonstrates, Portsmouth is unable to meet its own needs based on the standard method figure, and so is unable to meet the housing needs of other authorities. The starting point for Duty to Cooperate discussions has therefore, been to see if other authorities could meet some of Portsmouth's unmet need. For the Portsmouth Pre-Submission Local Plan 2024, under the old standard method, the level of unmet need the Council was seeking to be met elsewhere was 4,377 dwellings over the plan period of 2020-2040, or 219 dwellings per annum. For the Portsmouth Pre-Submission Local Plan Addendum 2025, based on the new standard method figure, the level of unmet need the Council has been seeking

¹³ <https://www.portsmouth.gov.uk/services/development-and-planning/planning-policy/portsmouth-local-plan-evidence/duty-to-cooperate/>

to be met elsewhere has been 3,916 dwellings over the plan period of 2025-2040, or 261 dwellings per annum.

5.4 Partnership for South Hampshire

- 5.4.1 Portsmouth City Council is an active member of Partnership for South Hampshire (PfSH), which was originally formed in 2003 as the Partnership for Urban South Hampshire (PUSH). It is a partnership of district and unitary authorities, together with HCC and the New Forest National Park Authority, working together to support the sustainable growth of the South Hampshire sub-region. PfSH consists of the local authorities of: Portsmouth, Southampton, East Hampshire, Eastleigh, Fareham, Gosport, Havant, New Forest, Test Valley, Winchester and the New Forest National Park, as well as HCC.
- 5.4.2 The Partnership has a strong track record in collaborative working to achieve common goals in South Hampshire. PfSH was heavily involved in the production of the sub-regional strategy for development that formed part of the South East Plan Regional Spatial Strategy. The ethos of collaborative cross boundary working continued in South Hampshire after the abolition of regional planning and the revocation of the South East Plan in 2013.
- 5.4.3 A number of Statements of Common Ground (SCGs) have been produced by PfSH over the years. The last one was signed by Joint Committee in September 2023¹⁴. It sets out the key strategic cross-boundary planning issues including housing needs and the methodology and framework for the preparation of the Spatial Position Statement published in December 2023. It is a snapshot of housing need and supply in the sub-region divided up between its constituent local authorities from 2022 - 2036. The overall deficit was estimated to be 14,351 homes at that time (including a deficit from Portsmouth). The SCG states that the shortfall is best defined as need that is not yet planned for, rather than need that is definitively unmet. It states that the shortfall would diminish over time as local plan reviews get underway and emerging plans are progressed.
- 5.4.4 The SCG identifies six local planning authorities that are less likely/unlikely to meet their housing needs: New Forest District, New Forest National Park Authority, Southampton, Gosport, Portsmouth and Havant. It states that the PfSH authorities are taking a two-stage approach to addressing the needs of those authorities, including Portsmouth, that are unable to meet their housing needs in full. In the first stage, the following authorities are identified as more likely to be able to meet and potentially exceed their housing need: East Hampshire, Eastleigh, Fareham, Test Valley and Winchester. The precise contribution from each authority will be determined through their respective local plan processes.
- 5.4.5 In the longer term and in stage two, Broad Areas of Search for Growth identified in the Spatial Position Statement will be considered through Local Plans. These have been identified by considering the combination of relative absence of strategic constraints, relative proximity to opportunities and services, and their scope in principle for good public and active travel connectivity. The broad areas would require further investigation and technical work to determine their suitability as specific locations for development,

¹⁴ <https://www.push.gov.uk/wp-content/uploads/2023/11/Item-8-Statement-of-Common-Ground.pdf>

and to test their capacity, deliverability, infrastructure and mitigation needs to achieve allocations in Local Plans. A preliminary assessment suggests that the areas of search have a combined capacity for around 7,500 dwellings, subject to deliverability, infrastructure and mitigation.

- 5.4.6 It should be noted that Portsmouth is not the only local planning authority in South Hampshire where growth is constrained. The sub-region is bounded by two national parks, an Area of Outstanding National Beauty (National Landscape), the coast/estuaries, a range of international, national and local biodiversity designations and it needs to accommodate land for biodiversity mitigation and net gain. It is already heavily built up in places, with areas of valued countryside often important in landscape terms or as settlement gaps protecting the identity of individual towns and villages. Some areas are less accessible by public transport. The SCG states that the need to accommodate significantly more homes for people in the medium and longer term, including in the areas of search, will need to be carefully tested through local plans against all of these important characteristics to achieve the optimum solution.
- 5.4.7 The PfSH Spatial Position Statement¹⁵ was approved by Joint Committee in December 2023. It aims to provide guiding principles for local plans to help deliver sustainable development within South Hampshire. It should be noted that it is not an upper tier plan with which future local plans will need to conform. It does, however, help inform the preparation and strategic co-ordination of local plans under the duty to cooperate. Table 1 of the Spatial Position Statement compares housing need and supply along with shortfalls and surpluses for each local authority in PfSH as a snapshot in time. On this basis the latest shortfall is 11,771 dwellings (2023 - 2036). Several evidence based documents supporting the Spatial Position Statement were published at the same time including the Broad Areas of Growth Assessments.
- 5.4.8 The Spatial Position Statement retains the strategic principle of focusing growth on cities/urban areas first to maximise housing delivery within existing urban areas and identifies a number of existing strategic development locations in SPS7. It also identifies new Broad Areas of Search for Growth as follows:
- South-east/east of Eastleigh Town (Eastleigh);
 - Havant Town Centre (Havant);
 - Waterlooville Town Centre (Havant);
 - Southleigh (Havant);
 - East of Romsey (Test Valley);
 - South-west of Chandler's Ford (Test Valley);
 - East of Botley (Winchester).
- 5.4.9 The sites that fall within the broad areas of search will need to be tested through the local plan preparation process, including against other sites that may be available or promoted within individual local planning authority areas. The local plan process will also need to resolve the quantum and form of development on sites and the infrastructure that will need to be provided to support development and make it sustainable.

¹⁵ Partnership for South Hampshire (Dec 2023) *Partnership for South Hampshire Spatial Position Statement* <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.push.gov.uk%2Fwp-content%2Fuploads%2F2023%2F12%2FPfSH-Spatial-Position-Statement-6-December-2023.doc&wdOrigin=BROWSELINK>

- 5.4.10 In September 2025 PCC asked the PfSH Planning Officers Group to consider if there was a collective desire to pursue further work through the Spatial Position Statement. The following was agreed with PfSH members:

'In September 2025, PCC took an item to PfSH Planning Officers Group to ascertain the appropriate approach to monitoring/reviewing the PfSH Spatial Position Statement (2023) prior to the preparation of a statutory Spatial Development Strategy by the proposed Mayoral Combined Authority for Hampshire and the Solent. A draft statement is being considered by the Planning Officers Group, with the intention of recommending it to the PfSH Joint Committee in December.'

- 5.4.11 PCC will continue to work with PfSH authorities on a range of ongoing cross boundary issues such as nutrient neutrality and Biodiversity Net Gain offsetting. However, in response to the above PCC is pivoting to focus on working in partnership with the other South East Hampshire local planning authorities as a means to deal with cross boundary housing and employment needs discussions.

5.5 South East Hampshire Local Planning Authorities

- 5.5.1 Gosport Borough Council, Havant Borough Council and Portsmouth City Council have been working together since May 2025 in order to identify a combined unmet housing and employment need position. The three authorities began undertaking this work due to all three authorities being at a similarly advanced stage of plan making, namely approaching pre-submission. The three local authorities are located entirely within the same housing market area and functional economic market area of south east Hampshire.
- 5.5.2 The three authorities of Gosport, Havant and Portsmouth are all constrained in their ability to deliver housing growth by their physical geography and considerable constraints such as Special Protection Areas and Ramsar sites. As a result of such constraints the three authorities have unmet housing needs which they need to ask their more rural neighbours to their north to help accommodate (East Hampshire, Fareham and Winchester). The unmet need figure for the three authorities combined is 18,347 homes. The purpose of this work is to provide clarity on the quantum of unmet need in South Est Hampshire so that negotiations on meeting this need can progress in an evidence fashion.

5.6 Unmet Housing Needs to be met by Other Authorities

- 5.6.1 As part of PfSH, Portsmouth City Council has agreed with Fareham that they will deliver some of Portsmouth's unmet housing need. Agreement has also been reached with Winchester for them to meet some of Portsmouth's unmet housing need.
- 5.6.2 Fareham Borough Council has made a commitment in their adopted Local Plan¹⁶ (2023) to meet 800 dwellings of Portsmouth's unmet housing need. This reduces Portsmouth's unmet need from 3,916 dwellings over the plan period, to 3,166 dwellings. On an annual

¹⁶ https://www.fareham.gov.uk/pdf/planning/local_plan/1FLP2037.pdf

basis, the shortfall is 261 dwellings per annum below the standard method annual need figure of 1,019 dwellings per annum, reduced to 208 dwellings per annum below the standard method figure when the contribution from Fareham is taken into account. Delivering 11,369 dwellings meets 74% of local housing need judged against the standard method. When taking into account the contribution from Fareham, delivering 12,169 dwellings meets 80% of local housing need judged against the standard method.

- 5.6.3 Winchester City Council has also made a commitment to provide 30% of its residual unmet need housing allowance to Portsmouth. This commitment is set out in a statement of common ground submitted with Portsmouth's Local Plan, and is also part of Winchester's submitted Local Plan. However, unlike at Fareham where that local plan has been through examination and been adopted, Winchester's Local Plan was submitted in November 2024 and has been through the hearings sessions but is not yet adopted. An initial note from the Inspector of the Winchester Local Plan has indicated that the Winchester Local Plan is likely to be capable of being found legally compliant and sound was published in September 2025¹⁷. If the Winchester Local Plan proceeds to adoption based upon this, it would provide for 67 dwellings of Portsmouth unmet housing need.
- 5.6.4 The Local Plans of other neighbouring authorities are still being progressed, and Portsmouth continues to work with them to try and secure further commitments to meet the remainder of Portsmouth's unmet housing needs.

¹⁷ <https://www.localplan.winchester.gov.uk/assets/inline/2670/ED38a-Inspector-Note-16-Post-hearing-action-points.pdf>

6 Five Year Housing Land Supply and Trajectory

6.1 Introduction

- 6.1.1 This section looks at the supply of sites for housing development available in Portsmouth, and then sets out the Council's five year housing land supply anticipated on adoption of the Portsmouth Local Plan. The housing trajectory is also presented.

6.2 National Policy Context

- 6.2.1 As part of identifying land for new homes, the NPPF (paragraph 72) sets out that planning policies should identify a sufficient supply sites for housing, identifying a supply of specific, deliverable sites for the five years following the intended date of adoption, with an appropriate buffer (moved forward from later in the plan period), and specific, developable sites or broad locations for growth for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period.
- 6.2.2 The appropriate buffer to apply is explained in paragraph 78 of the NPPF, with either a 5% or a 20% buffer to be applied depending on past delivery rates. It is explained in that same paragraph that this buffer is to be moved forward from later in the plan period.
- 6.2.3 The PPG (Paragraph: 012 Reference ID: 68-021-20190722) sets out that a stepped housing requirement may be appropriate in certain circumstances:
- 'A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period.'*
- 6.2.4 The NPPF sets out policy on maintaining the supply and delivery of housing. This includes requiring that strategic policies include a trajectory showing the expected rate of housing delivery over the plan period and consideration of the anticipated rate of housing development for specific sites (paragraph 78).

6.3 Portsmouth's Housing Land Supply

- 6.3.1 The HELAA (2025) provides the evidence on the supply of land for housing in Portsmouth. Monitoring data provides the latest information on planning permissions. Table 8 below sets out the supply of sites being planned for via the Portsmouth Pre-Submission Local Plan 2024 and Portsmouth Pre-Submission Local Plan Addendum 2025, and the dates they are likely to come forward over the plan period as demonstrated through the HELAA. The windfall allowance and non-implementation rate has also been included as discussed in section 3 of this paper.

Table 8 Supply of Housing Sites over the Plan Period

Type of Site	HELAA Ref.	Site Name	Years 0-5 (no. dwellings)	Years 6-10 (no. dwellings)	Years 11-15 (no. dwellings)	Total
Strategic Site	NE19	Tipner West	0	400	600	1000
Strategic Site	NE18	Tipner East	210	533	313	1056
Strategic Site - City Centre	CD16	Matalan Outlet and Car Park	0	300	0	300
Strategic Site - City Centre	CD17	City Centre North	550	525	525	1600
Strategic Site - City Centre	CD18	Debenhams Commercial Road	300	269	0	569
Strategic Site - City Centre	CD22	30 Arundel Street	5	0	0	5
Strategic Site - City Centre	CD25	Portsmouth Mail Centre	102	0	0	102
Strategic Site - City Centre	CD26	Land adjacent Catherine House	0	147	0	147
Strategic Site - City Centre	CD28	2-10 Edinburgh Road	0	20	0	20
Strategic Site - City Centre	CD30	41-47 Arundel Street	0	40	0	40
Strategic Site - City Centre	CD31	194-198 Commercial Road	0	80	0	80
Strategic Site - City Centre	CD32	200-204 Commercial Road	0	40	0	40
Strategic Site - City Centre	CD34	Tesco/NCP, Craswell Street	0	160	0	160
Strategic Site - City Centre	CD36	12-28 Arundel Street	0	249	0	249
Strategic Site - City Centre	CD37	Arundel Street - Shopmobility	0	76	0	76
Strategic Site - City Centre	CD50	Greggs - Nationwide, Commercial Road	0	70	0	70
Strategic Site	MI02	Fratton Park & the Pompey Centre	0	460	0	460
Strategic Site	MI01	St James' Hospital and Langstone Campus	285	120	0	405
Site Allocation	PA01	Port Solent	0	250	250	500
Site Allocation	SJ15	Former St John's College Southsea	212	0	0	212
Site Allocation	EC01	Fraser Range	40	94	0	134

Type of Site	HELAA Ref.	Site Name	Years 0-5 (no. dwellings)	Years 6-10 (no. dwellings)	Years 11-15 (no. dwellings)	Total
Site Allocation	HI06	The News Centre	0	100	0	100
Site Allocation	ST11	Somers Orchard	0	566	0	566
Planning permissions		At 31/03/2025 (excluding strategic sites, allocations and deliverable and developable sites)	833	0	0	833
Deliverable site	COP01	Brynwell Builders Yard, 207-217 Copnor Road	25	0	0	25
Deliverable site	COS01	Cosham Health Centre	70	0	0	70
Deliverable site	CS06	227-231 Goldsmith Avenue	25	0	0	25
Deliverable site	EC14	Eastney Swimming Pool	6	0	0	6
Deliverable site	FR06	St Wilfrids Church, 49 Goerge Street	8	0	0	8
Deliverable site	MI07	185-191 Highland Road	8	0	0	8
Deliverable site	ST03	Open space at Stone Street	18	0	0	18
Developable site	BA01	Coniston Avenue	0	11	0	11
Developable site	BA02	West of Milton Road (Copnor Bridge)	0	0	8	8
Developable site	CD01	Wardroom	0	200	0	200
Developable site	CD04	The Invincible, Wickham Street	0	40	0	40
Developable site	CD07	Bridge Centre, Fratton	0	115	0	115
Developable site	CD10	Maxstoke Close Car Park	0	5	0	5
Developable site	CD15	Hertford Place	0	17	0	17
Developable site	CD35	42 Kent Street, Groundlings Theatre	0	20	0	20
Developable site	CD65	117-127 Fratton Road (former Fratton Cinema)	0	30	0	30

Type of Site	HELAA Ref.	Site Name	Years 0-5 (no. dwellings)	Years 6-10 (no. dwellings)	Years 11-15 (no. dwellings)	Total
Developable site	CD75	Venture Tower, Fratton Road	0	41	0	41
Developable site	COS03	Westmoors, 50 London Road	0	10	0	10
Developable site	COS04	Former Cosham Police Station	0	60	0	60
Developable site	COS05	Clockhouse Centre	0	18	0	18
Developable site	DF02	Karen Avenue	0	6	0	6
Developable site	EC02B	Land at Halliday Crescent	0	5	0	5
Developable site	EC11	Southsea Marina, Fort Cumberland Road	0	12	0	12
Developable site	HI01	Hilsea Lodge (Highgrove)	0	34	0	34
Developable site	HI02	Land of former supermarket Stubbington Avenue	0	20	0	20
Developable site	HI04	Land at Pompey Health and Fitness Club	0	10	0	10
Developable site	HI13	Territorial Army Centre, Peronne Road	0	0	28	28
Developable site	MI05	Goldsmith Avenue	0	0	20	20
Developable site	NE01	Connect Centre, Kingston Crescent	0	191	0	191
Developable site	NE03	Former Police Station Kingstone Crescent	0	60	0	60
Developable site	NE05	205 London Road	0	5	0	5
Developable site	NE06	Blue Anchor PH, 2 London Road	0	6	0	6
Developable site	NE09	98 London Road	0	30	0	30
Developable site	NE22	Land at Heathfield Road	0	18	0	18
Developable site	PA03	140 Southampton Road	0	20	0	20

Type of Site	HELAA Ref.	Site Name	Years 0-5 (no. dwellings)	Years 6-10 (no. dwellings)	Years 11-15 (no. dwellings)	Total
Developable site	PA16	Amenity Land, Newbolt Road & Bodmin Road	0	8	0	8
Developable site	SJ04	61-63 Marmion Road	0	5	0	5
Developable site	SJ12	82-88 Clarendon Road	0	20	0	20
Developable site	SJ16	Wimbledon Park Sports Centre	0	30	0	30
Developable site	SJ17	Queen's Hotel and Grosvenor Casino	0	104	0	104
Developable site	ST01	City Records Office	0	45	0	45
Developable site	ST02	Middle Street	0	163	0	163
Developable site	ST04	Wightlink Car Park	0	0	60	60
Developable site	ST07	Derelict Land, Warwick Crescent	0	14	0	14
Developable site	ST12	Cathedral House	0	8	0	8
Developable site	ST13	62 Middle Street	0	8	0	8
Developable site	ST17	Clarence Pier	0	100	100	200
Windfall allowance		79 dwellings per annum	395	395	395	1185
Total			3,092	6,383	2,299	11,774
Non-implementation rate		Planning permissions - minus 15%	-125 (rounded)	0	0	-125 (rounded)
Non-implementation rate		Deliverable sites - minus 15%	-24	0	0	-24
Non-implementation rate		Developable sites - minus 15%	0	-223 (rounded)	-32 (rounded)	-256 (rounded)
Total			2,943 (rounded)	6,160 (rounded)	2,267 (rounded)	11,369 (rounded)
Annual average			589 (rounded)	1277 (rounded)	460 (rounded)	758 (rounded)

- 6.3.2 As discussed previously in section 3 of this paper, and can be seen from Table 8 above, 11,369 dwellings can be delivered over the plan period. This equates to an annual average of 758 dwellings per annum. However, what is also clear from Table 8 is that the 758 dwellings cannot be achieved in the first five years of the plan. Supply is focused heavily on years 6-10, with less predicted to come forward in years 11-15. To address this, a stepped housing requirement is necessary so that Portsmouth can meet the NPPF requirements of having a supply of deliverable sites for five years following the date of adoption.
- 6.3.3 A stepped housing requirement is proposed in policy PLP16 of the Portsmouth Pre-Submission Local Plan Addendum 2025 due to various strategic sites and allocations being phased for delivery later in the plan period. Portsmouth City Council has not sought to deliberately delay housing delivery, but predictions on when strategic sites and allocations will come forward are based on realistic estimates of the time taken to bring these sites forward. Part of the reason for later delivery is that a number of the strategic sites and site allocations include the delivery of flats, the timing of which tends to be "lumpy", that is, none are developed in the shorter term, but then all are delivered in one go, or in a few large batches, for example when a tower block is completed. This differs from non-flatted development of standard two storey houses which tends to come forward more gradually over time, as individual houses are completed.
- 6.3.4 Table 8 shows that, based on the HELAA (2025), an average of 589 dwellings per annum can be delivered in the first five years of the plan period, the balance for the remaining ten years of the plan would then be 843 dwellings per annum. To provide a stepped housing requirement which gets as close to the total of 11,369 dwellings as possible, the requirement for years 0-5 has been rounded down to 588 rather than being rounded up to 589. So PLP16 sets the housing requirement for years 0-5 of the Local Plan to be 588 dwellings per annum. As there is more uncertainty over the exact timing of sites delivering in years 6-15, simply because they are to be delivered some time in the future, it was considered appropriate to average out the supply for years 6-10 and years 11-15 to provide a housing requirement for years 6-15. This equates to 843 dwellings per annum. It was therefore, considered appropriate to step up the housing requirement to 843 dwellings per annum in years 6-15 of the plan period. Together, the total requirement with the stepped housing target equates to 11,370.
- 6.3.4 As a "capacity-based" approach has been taken to establish Portsmouth's housing requirement, whereby all sites which can possibly be allocated or identified have been included in the Local Plan, a further buffer cannot be added on top of this, so the housing requirement set out in policy PLP16 is considered to be inclusive of a buffer. The appropriate buffer for Portsmouth is 20% as there has been significant under delivery of housing over the previous three years as measured by the Housing Delivery Test. The most recent Housing Delivery Test Measurement (for 2023, published on 12 December 2024) shows that Portsmouth's result was 26%. The Council's latest Housing Delivery Test Action Plan can be found on the Council's website¹⁸. Without the 20% buffer the annual requirement for the first five years would be 470 dwellings per annum (rounded).

¹⁸ <https://www.portsmouth.gov.uk/wp-content/uploads/2025/06/Housing-Delivery-Test-Action-Plan-2024-2025-accessible-aa.pdf>

6.4 Portsmouth's Five Year Housing Land Supply on Adoption of the Local Plan

- 6.4.1 Portsmouth's Local Plan is anticipated to be adopted in spring 2027, that is roughly the end of the monitoring year 2026/27. Table 9 below shows the calculation of Portsmouth's anticipated five year housing land supply on adoption of the Portsmouth Local Plan against the housing requirement set out in policy PLP16 of the Portsmouth Pre-Submission Local Plan Addendum 2025.

Table 9: Five year housing land supply position from the year of anticipated adoption of the Portsmouth Local Plan (spring 2027)

Five-year Housing Land Supply for 2027/28 - 2031/32	How calculated	Number of Dwellings
Anticipated completions in 2025/26-2026/27 (the two years of the plan period prior to anticipated adoption) (Includes strategic sites, allocations, windfall allowance, outstanding permissions, deliverable sites identified in Appendix 2 of the Portsmouth Pre-Submission Local Plan Addendum 2025)	752 + 496	1,248
Minus 15% non-implementation rate (applied to planning permissions outstanding at 31 March 2025, Deliverable sites identified in Appendix 2)	72 + 42	(-113 (rounded))
Total supply anticipated 2025/26-2026/27	1,248 - 113	1,135
Annualised requirement including 20% buffer (dwellings per annum)	588	588
Total requirement 2025/26-2026/27	588 x 2	1,176
Surplus/shortfall against requirement for this period	1,176 - 1,135	- 41
Anticipated completions in 2027/28-2031/32 (the five year period from adoption) (Includes strategic sites, allocations, windfall allowance, outstanding permissions, deliverable and developable sites identified in Appendix 2, of the Portsmouth Pre-Submission Local Plan Addendum 2025 - excluding any completions counted in the row above)	568 + 658 + 618 + 794 + 963	3,601
Minus 15% non-implementation rate (applied to planning permissions outstanding at 31 March 2025, Deliverable and Developable sites identified in Appendix 2)	18 + 14 + 4 + 39 + 14	(- 89)
Minus shortfall predicted in 2025/26-2026/27	-41	(-41)
Total supply anticipated 2027/28-2031/32	3,601 - 89 - 41	3,471
Housing Target as set in the PLP (per year) (inclusive of 20% buffer)	588 x 3 plus 843 x 2	3,450
Annualised requirement including buffer (dwellings per annum)	3,450 / 5	690
Surplus / shortfall against identified need for this period	3,471 - 3,450	+ 21
Housing land supply for 2027/28 - 2031/32	3,471 / 690	5.03 years

- 6.4.2 Table 13 above demonstrates that there is a deliverable housing supply of 5.03 years identified in the Local Plan against the total five year housing land supply requirement (including a buffer of 20%) from the date of adoption in spring 2027.

6.5 Housing Trajectory

- 6.5.1 The trajectory shown in Appendix 1 of this paper illustrates how the target for each year of the Plan period relates to the overall annualised housing target of 588 dwellings per annum for years 0-5 and 843 dwellings per annum for years 6-15. The trajectory is based on the best available information at the time of writing this paper, however, this is just one possible scenario of how housing delivery will unfold for all the identified sources of supply included in the emerging Local Plan. Annual monitoring of housing delivery will be required to assess actual delivery against the housing requirement target set by the Local Plan to ascertain the extent to which the trajectory is being achieved.

7 Conclusion - Setting the Housing Requirement

- 7.1 Section 2 of this Housing Background Paper has established that the housing need figure for Portsmouth is 1,019 dwellings per annum, a total of 15,285 over the plan period 2025 - 2040. However, section 3 has stated that the most which could be accommodated through existing supply and available land is 758 dwellings per annum (on average), a total of 11,369 dwellings over the Plan period.
- 7.2 Given the findings of section 3 of this paper, Portsmouth City Council has little choice but to set a requirement of 11,369 dwellings over the Plan period. This is a 'capacity-based' requirement based on the level of housing that can be realistically achieved within the Plan period having regard to Portsmouth's constraints, land availability and development capacity. Portsmouth is a physically compact, highly built up city, with many constraining factors including its wealth of nature and heritage designations that limit options for housing growth. Housing delivery in the City is a major challenge, which means that the Local Plan has an important role to play in balancing the wide range of competing development needs and the need to protect or enhance the quality of the environment, in order to plan for the long-term sustainable growth of the City. Despite this challenge, the Council has sought to leave 'no stone unturned' in robustly and positively identifying all sources of potential housing supply, whilst being pragmatic in its assessment of delivery from permitted sites and deliverable and developable HELAA sites through the application of a "non-implementation rate". The Council has also set an ambitious policy on housing density to help maximise the potential of the sites which *are* available for development.
- 7.3 Whilst the housing requirement does not meet the standard method housing need in full, it is not considered that the proposed level of housing development would lead to constrained economic growth, as the HEDNA Update (2025) indicates that the local economy is not putting upward pressure on housing in the City.
- 7.4 The City Council considers that the housing target set in Policy PLP16 of the Portsmouth Pre-Submission Local Plan Addendum 2025 is both justified and broadly consistent with national policy.
- 7.5 Given that the overall housing target in the Portsmouth Pre-Submission Local Plan Addendum 2025 is 11,369 dwellings, the identified small/medium size sites of less than 1ha (totalling 1,443 dwellings) exceeds the 10% requirement from the NPPF (para 70(a)), as 10% of 11,369 is 1,137.
- 7.6 A further contribution to the housing supply is being sought from neighbouring local authorities through the Duty to Cooperate, which is discussed in section 5 of this Housing Background Paper. A commitment to deliver 800 homes has been secured from Fareham, which have been allocated in the Fareham Local Plan (2023), and a further commitment is proposed to be met in Winchester.
- 7.7 In order to provide a five year housing land supply on adoption, a stepped housing requirement has been proposed, with a requirement of 588 dwellings per annum in years 0-5 of the plan period, followed by a requirement of 843 dwellings per annum in years 6-15 of

the plan period. As a result, the Council will have 5.03 years supply of housing land on adoption of the Local Plan.

- 7.8 Further detail on how many homes are expected to be delivered annually over the entire plan period is set out in Appendix 1 of this Housing Background Paper, which provides the trajectory for the Portsmouth Pre-Submission Local Plan Addendum 2025.

Appendix 1 Housing Trajectory

Year of the Local Plan		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	No. Dwellings (Net)	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40
Net completions since 01 April 2025																
Total	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic Sites																
NE19 Tipner West	1000	0	0	0	0	0	0	0	100	150	150	100	100	100	100	200
NE18 Tipner East																
Vivid Homes (22/01292/FUL)	835	0	0	0	100	110	0	104	104	104	0	104	104	105	0	0
Bellway (21/01357/FUL)	221	0				0	73	74	74	0	0	0	0	0	0	0
Portsmouth City Centre																
CD17 City Centre North	1600	0	0	184	183	183	0	0	175	175	175	0	0	175	175	175
CD37 Arundel St, Shopmobility	76	0	0	0	0	0	0	0	76	0	0	0	0	0	0	0
CD22 30 Arundel Street	5	0	0	5	0	0	0	0	0	0	0	0	0	0	0	0
CD28 2-10 Edinburgh Road	20	0	0	0	0	0	0	0	20	0	0	0	0	0	0	0
CD32 200-204 Commercial Rd	40	0	0	0	0	0	0	40	0	0	0	0	0	0	0	0
CD31 194-198 Commercial Rd	80	0	0	0	0	0	0	80	0	0	0	0	0	0	0	0
CD30 41-47 Arundel St	40	0	0	0	0	0	0	40	0	0	0	0	0	0	0	0
CD34 Tesco/NCP	160	0	0	0	0	0	0	0	0	80	80	0	0	0	0	0
CD50 Greggs-Nationwide	70	0	0	0	0	0	0	0	0	70	0	0	0	0	0	0
CD16 Matalan	300	0	0	0	0	0	0	0	0	150	150	0	0	0	0	0
CD18 Debenhams	569	0	0	0	150	150	150	119	0	0	0	0	0	0	0	0
CD25 Portsmouth Mail Centre	102	0	0	51	51	0	0	0	0	0	0	0	0	0	0	0
CD26 Land adj Catherine's House	147	0	0	0	0	0	0	75	72	0	0	0	0	0	0	0
CD36 12-28 Arundel Street	249	0	0	0	0	0	0	0	0	125	124	0	0	0	0	0
MI02 Fratton Park & the Pompey Centre	460	0	0	0	0	0	0	0	154	153	153	0	0	0	0	0
MI01 St James' and Langstone Campus																
St James' (HE site 24/01117/FUL)	58	0	29	29	0	0	0	0	0	0	0	0	0	0	0	0
St James' (HE site, not yet permitted)	30	0	0	0	0	30	0	0	0	0	0	0	0	0	0	0
St James' (PJ Livesey site)	197	139	58	0	0	0	0	0	0	0	0	0	0	0	0	0
Langstone Campus	120	0	0	0	0	0	0	120	0	0	0	0	0	0	0	0
Total	6379	139	87	269	484	473	223	652	775	1007	832	204	204	380	275	375
Allocations																
PA01 Port Solent	500	0	0	0	0	0	0	0	0	125	125	125	125	0	0	0
SJ15 St John's College	212	57	53	102	0	0	0	0	0	0	0	0	0	0	0	0
EC01 Fraser Range	134	0	0	0	0	40	94	0	0	0	0	0	0	0	0	0
HI06 The News Centre	100	0	0	0	0	0	0	0	0	100	0	0	0	0	0	0
ST11 Somers Orchard, Somerstown	566	0	0	0	0	0	136	137	123	124	46	0	0	0	0	0
Total	1512	57	53	102	0	40	230	137	123	349	171	125	125	0	0	0
Deliverable Sites (excluding Strategic Sites and Allocations) Planning permissions outstanding at 31 March 2025																
Sites of 10 or more units																
Royal Beach Hotel (East Wing) 1 St Helens Parade (22/01032/FUL)	29	29	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hippodrome House, 5-9 Guildhall Walk (20/00019/PACOU)	45	45	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Year of the Local Plan		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	No. Dwellings (Net)	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40
Portland Hotel, 38 Kent Road (16/01584/FUL)	12	12	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Former Ambulance Station Land Adjacent To The Harbour Car Park Ship Leopard Street Portsmouth (17/00473/OUT)	11	0	0	11	0	0	0	0	0	0	0	0	0	0	0	0
Roebuck House, Roebuck Close (21/00022/PACOU)	50	50	0	0	0	0	0	0	0	0	0	0	0	0	0	0
44-66 Palmerston Road (Former Debenhams) (20/00620/FUL)	134	0	98	36	0	0	0	0	0	0	0	0	0	0	0	0
Edinburgh House, Land at former Sundridge Close (21/01710/CS3)	50	0	50	0	0	0	0	0	0	0	0	0	0	0	0	0
Former Frank Sorrell Centre, Prince Albert Road (21/01833/PA)	18	0	0	18	0	0	0	0	0	0	0	0	0	0	0	0
5 Somers Road (20/00716/FUL)	13	13	0	0	0	0	0	0	0	0	0	0	0	0	0	0
111 Havant Road (21/00684/FUL)	52	52	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Empire House, 5 Kings Road (24/00002/PACOU)	11	0	11	0	0	0	0	0	0	0	0	0	0	0	0	0
Tower Block, Highbury College, Tudor Crescent (21/01730/FUL)	-31	0	-31	0	0	0	0	0	0	0	0	0	0	0	0	0
All other sites less than 10 units																
All other sites less than 10 units total	439	276	149	14	0	0	0	0	0	0	0	0	0	0	0	0
Total	833	477	277	79	0	0	0	0	0	0	0	0	0	0	0	0
Deliverable Sites (excluding Strategic Sites and Allocations)																
Deliverable Sites identified in Appendix 2																
COP01 Brynwell Builder's Yard	25	0	0	25	0	0	0	0	0	0	0	0	0	0	0	0
COS01 Cosham Health Centre	70	0	0	0	70	0	0	0	0	0	0	0	0	0	0	0
CS06 227-231 Goldsmith Avenue	25	0	0	0	25	0	0	0	0	0	0	0	0	0	0	0
EC14 Eastney Swimming Pool	6	0	0	6	0	0	0	0	0	0	0	0	0	0	0	0
FR06 St Wilfrids Church	8	0	0	0	0	8	0	0	0	0	0	0	0	0	0	0
MI07 185-192 Highland Road	8	0	0	8	0	0	0	0	0	0	0	0	0	0	0	0
ST03 Open space at Stone Street	18	0	0	0	0	18	0	0	0	0	0	0	0	0	0	0
Total	160	0	0	39	95	26	0	0	0	0	0	0	0	0	0	0
Developable Sites (excluding Strategic Sites and Allocations)																
Developable Sites identified in Appendix 2																
BA01 Coniston Avenue	11	0	0	0	0	0	0	0	0	0	11	0	0	0	0	0
BA02 West of Milton Road	8	0	0	0	0	0	0	0	0	0	0	0	0	8	0	0
CD01 Wardroom	200	0	0	0	0	0	0	0	0	100	100	0	0	0	0	0
CD04 The Invincible	40	0	0	0	0	0	40	0	0	0	0	0	0	0	0	0
CD07 Bridge Centre	115	0	0	0	0	0	0	0	0	50	65	0	0	0	0	0
CD10 Maxstoke Close Car Park	5	0	0	0	0	0	0	0	0	0	5	0	0	0	0	0
CD15 Hertford Place	17	0	0	0	0	0	0	0	0	0	17	0	0	0	0	0
CD35 Groundlings Theatre	20	0	0	0	0	0	0	0	20	0	0	0	0	0	0	0
CD65 117-127 Fratton Road	30	0	0	0	0	0	0	0	30	0	0	0	0	0	0	0
CD75 Venture Tower	41	0	0	0	0	0	41	0	0	0	0	0	0	0	0	0
COS03 Westmoors	10	0	0	0	0	0	0	0	10	0	0	0	0	0	0	0
COS04 Former Cosham Police Station	60	0	0	0	0	0	0	0	0	0	60	0	0	0	0	0
COS05 Clockhouse Centre	18	0	0	0	0	0	18	0	0	0	0	0	0	0	0	0
DF02 Karen Avenue	6	0	0	0	0	0	6	0	0	0	0	0	0	0	0	0

Year of the Local Plan		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	No. Dwellings (Net)	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40
ECO2B Land at Halliday Crescent	5	0	0	0	0	0	0	0	0	0	5	0	0	0	0	0
EC11 Southsea Marina	12	0	0	0	0	0	0	0	12	0	0	0	0	0	0	0
HI01 Hilsea Lodge	34	0	0	0	0	0	34	0	0	0	0	0	0	0	0	0
HI02 Land of former supermarket	20	0	0	0	0	0	0	0	20	0	0	0	0	0	0	0
HI04 Land at Pompey Health and Fitness	10	0	0	0	0	0	0	0	10	0	0	0	0	0	0	0
HI13 TA Centre, Peronne Road	28	0	0	0	0	0	0	0	0	0	0	0	0	0	0	28
MI05 Goldsmith Avenue	20	0	0	0	0	0	0	0	0	0	0	0	0	20	0	0
NE01 Connect Centre	191	0	0	0	0	0	96	95	0	0	0	0	0	0	0	0
NE03 Former Police Station	60	0	0	0	0	0	0	0	0	0	60	0	0	0	0	0
NE05 205 London Road	5	0	0	0	0	0	5	0	0	0	0	0	0	0	0	0
NE06 Blue Anchor PH	6	0	0	0	0	0	0	0	0	0	6	0	0	0	0	0
NE09 98 London Road	30	0	0	0	0	0	0	0	30	0	0	0	0	0	0	0
NE22 Land at Heathfield Road	18	0	0	0	0	0	0	0	18	0	0	0	0	0	0	0
PA03 140 Southampton Road	20	0	0	0	0	0	0	0	20	0	0	0	0	0	0	0
PA16 Amenity Land off Newbolt Rd & Bodmin Rd	8	0	0	0	0	0	0	0	0	0	8	0	0	0	0	0
SJ04 61-63 Marmion Road	5	0	0	0	0	0	0	0	5	0	0	0	0	0	0	0
SJ12 82-88 Clarendon Road	20	0	0	0	0	0	0	0	20	0	0	0	0	0	0	0
SJ16 Wimbledon Park Sports Centre	30	0	0	0	0	0	0	0	0	0	30	0	0	0	0	0
SJ17 Queen's Hotel and Casino	104	0	0	0	0	0	0	0	52	52	0	0	0	0	0	0
ST01 City Records Office	45	0	0	0	0	0	0	0	0	0	45	0	0	0	0	0
ST02 32-60 Middle Street	163	0	0	0	0	0	0	0	0	82	81	0	0	0	0	0
ST04 Wightlink Car Park	60	0	0	0	0	0	0	0	0	0	0	0	0	0	0	60
ST07 Derelict Land	14	0	0	0	0	0	14	0	0	0	0	0	0	0	0	0
ST12 Cathedral House	8	0	0	0	0	0	0	0	0	0	8	0	0	0	0	0
ST13 62 Middle Street	8	0	0	0	0	0	8	0	0	0	0	0	0	0	0	0
ST17 Clarence Pier	200	0	0	0	0	0	0	0	0	0	100	100	0	0	0	0
Total	1705	0	0	0	0	0	262	95	247	284	601	100	0	28	0	88
Windfall Allowance																
Total	1,185	79	79	79	79	79	79	79	79	79	79	79	79	79	79	79
TOTAL HOUSING SUPPLY																
Total (strategic sites, allocations and windfall)	9,076	275	219	450	563	592	532	868	977	1,435	1,082	408	408	459	354	454
Total (outstanding permissions, deliverable and developable sites identified in Appendix 2)	2,698	477	277	118	95	26	262	95	247	284	601	100	0	28	0	88
Total	11,774	752	496	568	658	618	794	963	1,224	1,719	1,683	508	408	487	354	542
15% non-implementation rate (applied to planning permissions outstanding at 31 March 2025, Deliverable sites identified in Appendix 2, and Developable sites identified in Appendix 2)	405	72	42	18	14	4	39	14	37	43	90	15	0	4	0	13
Total (outstanding permissions, deliverable and developable sites identified in Appendix 2) (minus non-implementation rate)	2,293	405	235	100	81	22	223	81	210	241	511	85	0	24	0	75
Total new homes 2025-2040 excluding Duty to Cooperate contribution	11,369	680	454	550	644	614	755	949	1,187	1,676	1,593	493	408	483	354	529
Duty to Cooperate contribution from neighbouring authorities	800	54	54	54	54	54	53	53	53	53	53	53	53	53	53	53
Total new homes 2025- 2040 including Duty to Cooperate contribution	12,169	734	508	604	698	668	808	1,002	1,240	1,729	1,646	546	461	536	407	582

