



NOTICE OF MEETING

CABINET MEMBER FOR PLANNING POLICY & CITY DEVELOPMENT

TUESDAY, 21 FEBRUARY 2023 AT 3.00 PM

COUNCIL CHAMBER - THE GUILDHALL, PORTSMOUTH

Telephone enquiries to Karen Martin, Tel: 023 9284 1704

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If any member of the public wishing to attend the meeting has access requirements, please notify the contact named above.

CABINET MEMBER FOR PLANNING POLICY & CITY DEVELOPMENT

Councillor Lee Hunt (Liberal Democrat)

Group Spokespersons

Councillor Ryan Brent, Conservative

Councillor George Fielding, Labour

(NB This Agenda should be retained for future reference with the minutes of this meeting.)

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Deputations by members of the public may be made on any item where a decision is going to be taken. The request should be made in writing to the contact officer (above) by 12 noon of the working day before the meeting, and must include the purpose of the deputation (for example, for or against the recommendations). Email requests are accepted.

AGENDA

- 1 Apologies for absence**
- 2 Declarations of interest**
- 3 Housing numbers and the Portsmouth Local Plan (Pages 3 - 8)**

Purpose

The purpose of this report is to explain the role of housing numbers in plan making for Portsmouth and how it has changed over the years.

RECOMMENDED - to note the importance of housing numbers in the emerging Portsmouth Local Plan and its implications for having it found

sound and legally compliant at examination.

4 Development Management Report (Pages 9 - 22)

Purpose

This report provides an update on performance of the Council's Development Management service. This follows a substantive report on the same subject to Cabinet in February 2022 and summarises monthly updates provided to the Portfolio Holder in weekly briefings.

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Title of meeting:	Planning Policy and City Development Portfolio Decision Meeting
Date of meeting:	21 February 2023
Subject:	Housing numbers and the Portsmouth Local Plan
Report by:	Ian Maguire, Assistant Director of Planning & Economic Development
Author:	Lucy Howard, Head of Planning Policy
Wards affected:	All
Key decision:	No
Full Council decision:	No

1. Purpose of report

- 1.1 The purpose of this report is to explain the role of housing numbers in plan making for Portsmouth and how it has changed over the years.

2. Recommendations

- 2.1 To note the importance of housing numbers in the emerging Portsmouth Local Plan and its implications for having it found sound and legally compliant at examination.

3. Background

- 3.1 This report traces the history of housing numbers in the preparation of development plans that cover the City.

4. Reasons for recommendations

- 4.1 We all need a decent home to live in. However, the provision of new homes is one of the most contentious issues in plan making with people concerned about the loss of open space and overcrowding. There have always been people who are concerned about new buildings. There is an intergenerational perspective to the housing issue with many of the objectors to housing development living in homes that they purchased many years ago at a price well below current market value. In contrast younger people struggle to find affordable homes to rent or to get on the housing ladder and own their own homes. Therefore there can be a

tension between younger and older generations over house building. The average age for a first-time homebuyer in the UK outside London is now 32.

- 4.2 In the past, the housing targets for local plan areas such as the City of Portsmouth were set in higher level strategic plans and the role of the local plan was to allocate sufficient land to meet that target. This made Local Plans much simpler to prepare and examinations were much shorter as the housing target was not up for debate. The Hampshire Structure Plan Review (1996-2011) set a housing figure for the whole county of Hampshire including the two cities of 80,290 new homes, which included a figure of 9,000 new homes for Portsmouth. Annualised this is 600 new homes each year. The Structure Plan for Hampshire was replaced by the South East Plan, which was the Regional Spatial Strategy for the South East of England. This set a regional housing provision figure for the period 2006 to 2026 for South Hampshire of 80,000, which included a figure of 14,700 new homes in Portsmouth. Annualised this is 735 new homes each year.
- 4.3 With the abolition of higher-level strategic plans, the housing target for the number of new homes to be built in an area is set in a local plan. This is inevitably contentious and time consuming both in the preparation and examination of local plans. The Portsmouth Plan was adopted in 2012 after the abolition of both the Hampshire Structure Plan and the South East Plan. It states that there is a supply of 12,254 new homes in the City subject to infrastructure provision. Annualised this is 584 new homes each year.
- 4.4 The Coalition Government introduced the National Planning Policy Framework (NPPF) in 2012, which required local planning authorities to meet objectively assessed need as well as any needs that cannot be met within neighbouring areas. The current NPPF caveats the requirement to meet need, by stating that need does not need to be met if certain policy constraints exist including protected nature conservation designations, designated heritage assets and areas at risk of flooding.
- 4.6 There were a number of issues arising with how objectively assessed need was calculated and so in 2018 the Government introduced the Standard Methodology for calculating housing need. This has been contentious not least because it uses the rather dated 2014 based household projections as a baseline. The housing need for Portsmouth based on the Standard Methodology is 855 new homes per year.
- 4.6 The Government has a national target of building 300,000 new homes in England this year. This is a hugely challenging target that has never been met. The highest rate of completions was 243,000 new homes prior to the Pandemic in 20219-20. In order to increase the rate of house building the Government introduced the Housing Delivery Test in 2018. This measures whether a Council's housing requirement has been met on average over the last three years. Housing delivery in the City in the last few years has been less than the number set in the Portsmouth Plan and our standard Methodology number. A total of 270, 300 and 291 new homes were built in the last three years. We have

therefore had to publish a Housing Delivery Test Action Plan to explain the reasons for under delivery and set out ways in which we will address it.

- 4.7 The City Council is working hard to put an up-to-date Local Plan in place in order to strengthen our position on refusing unsuitable applications for housing development. In the meantime, our position is weaker meaning that we need to prepare a Housing Delivery Test Action Plan every year.
- 4.8 The Government recently clarified its emerging position on housing with a consultation on a revised NPPF. This clarifies that the housing need number generated by the Standard Methodology is an advisory starting point for establishing a housing requirement for the area. The local planning authority should then consider whether certain constraints limit the number of new homes that can be built. This is clearly the case in Portsmouth with a highly constricted land supply with much of the land that is available to build on at risk or flooding, close to international nature designations and includes heritage assets. We will clearly have to robustly demonstrate that we have left no stone unturned when looking for housing sites, but we have a strong case for setting a capacity based housing figure that is less than our housing need. This is what Worthing Borough Council did with its Local Plan, which has just passed examination. The town is similarly constrained to Portsmouth located as it is between the South Downs National Park and the sea. The Worthing Local Plan sets a housing target that meets only 24% of its need. The following paragraph from the Inspector's report is particularly relevant to Portsmouth:

There is no evidence to suggest that the Council has failed to understand the importance of housing delivery or the need to maximise capacity and delivery. A local plan must find a balance between providing land for housing and other uses. A local plan must also strive to meet the NPPF's objectives in relation to the quality of the built environment, the recognition of the intrinsic beauty of the countryside, protection of the natural environment and ensuring the residents of the Borough live in well-designed, beautiful and safe places with accessible services and open spaces. Housing delivery is important, but it is not the be-all and end-all of a Plan's role.

- 4.5 The Government has also expressed an intention to relax its approach to calculating need. In the revised NPPF, currently being consulted on, there is now clear guidance on what local circumstances could justify the use of alternative methods to the standard method for assessing housing need, for example, a university town with an above average proportion of students. This is something that we will look into further.
- 4.6 The Government is introducing a number of measures in the current NPPF consultation to encourage local authorities to speed up with the preparation of their local plans. This includes not having to prove that there is a five year housing land supply for the first five years after a local plan is adopted. Local authorities have until June 2025 to submit their local plans under the current system of plan making before a new and as yet untested system of plan making

comes in. If we miss this deadline we would need to go back to the beginning of plan making rather than continue with our current draft plan.

- 4.7 In conclusion, planning for housing is both complex and contentious. Housing need in Portsmouth is high and the amount of land available for development is extremely limited. There will be a new capacity based housing target in the Pre-Submission Local Plans that we will provide for Members to consider in the autumn. We must leave no stone unturned in looking for housing sites, but it is clear that we will not meet need. The question is how big the gap will be between our need and our target. We will at the same time work with our partners in the Partnership for South Hampshire (PfSH) who are less constrained in the amount of land they have available for development. Once our Local Plan is adopted with an achievable housing target we will be in a strong position to reject unsuitable housing schemes.

5. Equality impact assessment

- 5.1 An equality impact assessment is not required as the recommendations do not have a disproportionate negative impact on any of the specific protected characteristics as described in the Equality Act 2010.

6. Legal implications

- 6.1 There are no direct legal implications as result of approving the recommendations within this report.

7. Director of Finance's comments

- 7.1 There are no direct financial implications as result of approving the recommendations within this report.
- 7.2 The final production of the Local Plan will be met from the existing cash limited budget.

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Signed by: Ian Maguire, Assistant Director of Planning & Economic Growth

Background list of documents:

[Current consultation on reforms to national planning policy](#)

[Portsmouth Housing Delivery Test Action Plan](#)

The recommendation(s) set out above were approved/ approved as amended/ deferred/
rejected by on

.....
Signed by:

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Agenda Item 4

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Title of meeting:	Planning Policy and City Development Portfolio Meeting
Subject:	21 February 2023
Date of meeting:	Development Management Performance
Report by and Authored by:	Ian Maguire Assistant Director for Planning and Economic Development
Wards affected:	All

1. Requested by

- 1.1 This report was requested by the Planning Policy and City Development Portfolio holder, Cllr Lee Hunt

2. Purpose

- 2.1 This report provides an update on performance of the Council's Development Management service. This follows a substantive report on the same subject to Cabinet in February 2022 and summarises monthly updates provided to the Portfolio Holder in weekly briefings.

3. Information Requested

- 3.1 Performance in Development Management is monitored according to prescribed approaches given by the Department of Levelling Up, Housing and Communities. The assessment of performance is limited to the speed of determination following the receipt of valid applications, expressed as a targeted threshold of applications being within their statutory determination period of 8 to 16 weeks depending on the application type, or a longer time agreed with the applicant.
- 3.2 Within the Council however a key matter of concerns has been identified as the 'backlog' of undetermined cases. An LPA will always have some applications "in hand" while they take time to progress through the consultation, assessment and determination processes, and applicants would expect this. However through comparison with other periods where similar process and resource consideration

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applied we can identify an excess number of applications which through no fault of applicants are unnecessarily delayed due to a lack of resource to process them to resolution. When performance was reported to Cabinet and Full Council in 2022 the backlog was identified as being around 300 applications. Extraordinary action was therefore taken with the service undertaking a 'Decision Delivery Drive' in April and May 2022 in advance of rolling out the processes within the service. This Drive, which was publicised by the Council prior to implementation, and is a process that has since been replicated by other authorities, saw a hiatus in dealing with new customer enquiries to focus on clearing the backlog of applications. This two week initiative enabled the Council to process 250 applications, a 500% increase in productivity. This focus did impact the other performance metrics with performance in the relevant quarter only achieving 38.5% of non-major applications were determined in time in that quarter compared to the average of 73.9% of non-majors that were in time in the preceding quarters. The Decision Delivery Drive, as noted above was however primarily focussed on reducing the backlog of applications awaiting decision to reduce the service pressures of failure demand and more importantly resolve the customer concerns associated with undetermined applications. The Drive used newly introduced more efficient processes created with the support of Interventionist from the Council's Systems Thinking team and in this targeted way was able to reduce the backlog of cases by over half, from around 330 to closer to 150 excess open cases. This improvement can be seen in the 'Backlog' graph at the end of this report.

- 3.3 While the reduction in the backlog has reduced the failure demand managed by the department and resolved outstanding applications for residents and businesses the speed of determination of applications within statutory or agreed timetables still requires improvement. In January DLUHC wrote to the Council to advise us that we may be liable for designation for the speed of its decisions on applications for non-major development under section 62A of the Town and Country Planning Act 1990. This is because in the relevant assessed period, 24 months to September 2022 the Council determined 63.2% of non-major applications within time, compared to a government target of 70%. The current PCC performance, across all development types not just 'non-major' development is detailed in the '% in Time' graph at the end of this report. Around 20 local authorities were similarly written to at the same time with a requirement to detail any exceptional circumstances that they considered relevant to DLUHC consideration as to designation. Portsmouth City Council's letter to this effect was issued on 2nd February 2023, and is appended to this report for reference, and we are now awaiting a response from the Department. Key circumstances we have identified to government that we believe are relevant to current performance and the appropriateness of designation are the fact that the Council has already identified and actioned improvements to efficiencies, such as the decision delivery drive described above; the impact of Covid-19 on determinations in the first half of the relevant period; and the continuing challenges of staff retention and recruitment. These are problems for many local authorities but are particularly acute for Portsmouth.

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- 3.4 While the current performance against government percentage statistics is a matter of concern and attention for the LPA, this monitoring framework is hampered by being unable to distinguish applications that are determined 1 day after their determination period or 1 year after the determination. The statistical returns can therefore mask better or improving performance for customers. Similarly the ability to agree 'extension of time' agreements with applicants, while often beneficial and introduced to enable applicants to make necessary amendments to applications, can also mask delays in the actual time taken to determine applications. To understand these issues the LPA also monitors, outside of the DLUHC framework, the median determination time for its application in each month to assess whether the process improvement and prioritisation of staffing capacity is having the desired positive effect. These median determination periods are shown in the 'Timeliness' graph at the end of this report which shows the median number of days over 56 (the minimum statutory time limit for determination) taken to determine applications in that month. This graph shows that the interventions that have been made are making improvements, with the median determination time falling from over 130 days to 55 days in August and September 2022.
- 3.5 Government targets for performance have been met in all but one category and as can be seen from the attached graphs overall Development Management performance is improving but however still requires further improvement. While the backlog has been dramatically reduced there remains an excess number of applications awaiting determination. Similarly while processes within the service have been comprehensively reviewed and streamlined determination times remain too long. A key component of this challenge is the recruitment and retention of qualified planning staff. In 2022 the Council saw the departure of the Head of Development Management, 3 Principal Planning Officers and 3 Senior Planning Officers, as well as the reduction in working hours from staff adjusting to new working patterns or moving towards retirement. While extraordinary temporary staffing resourcing, and internal promotion assist with this capacity challenge temporary staff are frequently less able to generate the quality or speed of determination needed to make the necessary improvements as additional training, support and supervision is required from a reduced number of permanent established staff. Recent recruitment to these roles in Development Management have been unsuccessful.
- 3.6 A key focus for the department in 2023 therefore is the sustained and effective recruitment of qualified planning staff and the development and retention of current valued staff within the service. This will be carried out alongside continuous process improvement with the support of the Planning Advisory Service.

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Signed by pp(Director)

Appendices:**Background list of documents: Section 100D of the Local Government Act 1972**

The following documents disclose facts or matters, which have been relied upon to a material extent by the author in preparing this report:

Title of document	Location
Update on Development Management and increase in capacity - Report to Cabinet 08.02.2022	
Letter to Department of Levelling up Housing and Communities - 02.02.2023	

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Planning and Economic Growth

Mr Conrad Smewing
Department of Levelling Up, Housing and
Communities
BY EMAIL

Civic Offices
Guildhall Square
Portsmouth
PO1 2AU

2 February 2023

Dear Sir

Re: Local planning authorities that may be liable for designation under section 62A of the Town and Country Planning Act 1990

I am writing in response to your letter of 17 January 2023 wherein you advised Portsmouth City Council that they may be liable for designation for the speed of its decisions on applications for non-major development under section 62A of the Town and Country Planning Act 1990. Within this response I am taking the opportunity to lay out the exceptional circumstances that have affected the Council's performance and that would make a designation under s62A inappropriate.

The Council has identified that some data returns may not fully reflect the Council's performance and since receipt of your letter is taking steps to interrogate the Council's IT systems to improve this reporting. However at this time the Council does not intend to suggest any adjustments to the published data and acknowledges, irrespective of any minor corrections that might be able to be identified, that the planning performance giving rise to your letter requires substantive improvement and has committed to doing so.

The acknowledgment of underperformance in respect of the speed to determination is a key circumstance that we would ask to be considered in respect of any decisions regarding designation. The delay in determinations was identified in 2020 and steps have been and continue to be taken to understand and improve processes within the service to remedy this. More details regarding this matter are explained below.

During the period over which performance is being assessed the Council has also been particularly effected by restrictions associated with Covid-19 which effected both efficiency and workloads. Again more details regarding this circumstance are discussed below.

Within this period the Council has also suffered from significant staffing challenges. This has included the departure of key staff, including the Head of Development Management and senior and principal planning officers. Recruitment to these vacancies has been largely unsuccessful leading to associated departmental capacity issues. This is discussed in more detail below.

Acknowledgement of underperformance and introduction of process improvement

In January 2021 Portsmouth City Council itself identified concerns regarding the performance of planning services in respect of the speed of determination. While performance remained above the relevant thresholds a key element of this concern was a backlog of applications, with over 650 cases at that time open within the council's planning register. This backlog was partly caused by a near moratorium of permissions arising from a need to mitigate the production of nitrates resulting in eutrophication in the protected Solent Waters. The Council was one of first to actively acknowledge and seek to resolve the issue through local adopted mitigation strategies following complex discussions exacerbated in Portsmouth as compared to other effected LPAs as the geography of the local authority area, being the UK's only island city, meant that mitigation routes available to other authorities that included agricultural and rural land were not available to the City Council. The need to create a bespoke mitigation solution within an urban area required significant resources and delayed all new residential developments in the city due to a need to engage, explain and negotiation on a case by case basis.

Due to this backlog the Council's internal interventionist team was commissioned to undertake a business process review of the development management function focussed on planning application determination. This review was unfortunately delayed in 2021 as the 'Check' process to study the existing systems and process could not be delivered remotely during the periods where staff could not safely work within the Civic Offices due to Covid-19 restrictions. In accordance with national guidance and local risk assessment staff were however able to return to the Civic Office to enable the review team to observe and question them about the existing processes during 2021 and this led to a series of suggested interventions identified through the 'redesign' process that were then trialed on a small cohort of cases at the end of 2021. Following a review of these interventions by the Council's Cabinet at a meeting in February 2022 a new, more efficient system was rolled out as the new process later that year.

This new process has demonstrated a methodology that is capable of delivering significantly faster determination without any diminution of quality of decision making or customer service. The trail cohort of cases, 49 in total, were able to be determined in a median determination period of just 23 days. This more efficient approach was also measured with customer feedback from the effected Applicants, with positive comments received from all respondents and failure demand associated with the applications reduced to a single occurrence. These results are not replicable across the full service area, with larger complex cases requiring significantly more time, but demonstrate that Portsmouth City Council is capable of operating at a level of performance significantly improved to that identified in the current returns. Since the assessment period covered by the letter of 17 January 2023 the Council has also amended its Scheme of Delegation to reduce the number of applications that require consideration by the planning committee. This produces a sustained improvement in the speed of delivery for a significant number of cases which were being delayed to enable the more complex committee-decision process to be undertaken.

As well as introducing an improved process the Council also undertook a 'Decision Delivery Drive' in April and May 2022 in advance of rolling out the new processes. This Drive, which was publicised by the Council prior to implementation and is a process that has since been replicated by other authorities saw a hiatus in dealing with new customer enquiries to focus on clearing the backlog of applications. This two week initiative enabled the Council to process 250 applications, a 500% increase

in productivity. The impact on determination is evident in the reported returns in table P153 with the period April to June 2022 determining 304 non-major decisions compared to an average of 155 in the quarters preceding it. This work was considered to be worthwhile, not only to deliver planning decisions to applicants, but also to reduce the backlog of applications that were generating additional work through the associated failure demand within the Council as customers had to engage with the planning service to seek updates regarding their proposals. The focus in this period on determination of older applications within the backlog however resulted in a consequential drop in performance against the 'speed' threshold as applications that were past their statutory determination date were prioritised and decided. This is evident by the performance data that shows only 38.5% of non-major applications were determined in time in that quarter compared to the average of 73.9% of non-majors that were in time in the preceding quarters. Not all older applications were capable of resolution in this 'Drive' however as some had identified complexities that meant determination could not occur until the following quarter or beyond.

The Decision Delivery Drive, as noted above primarily focussed on reducing the backlog of applications awaiting decision. The use of the newly introduced more efficient processes in this targeted way was able to reduce the 'backlog' of cases by over half, from around 330 to closer to 150 excess open cases, see 'backlog' graph appended to this letter which covers all application types not just non-majors.

The embedding of process improvements already identified has also been effective at reducing the median time for determination across all application types. While applications are being determined outside of the statutory time limits and extension of time agreements are being made with the applicants and partners to manage the delivery of decisions the efficiencies already introduced have meant that the median time for determinations has been reduced from a peak of 135 days to 55/56 days in August to October 2022. This assessment covers all application types including Major and EIA developments. See timeliness graph appended to this letter which shows median determination period per month above 56 days. However as the historic backlog of cases is reduced and the new more efficient processes rolled out the Council is positive that this will see marked improvement in performance in 2023 and an enhanced performance can now be sustained as these new processes are embedded in the operation of the Council.

Continuous process improvements are continuing at the Council, alongside discussions with PAS, and the Council wish to continue working with the Planning Advisory Service to further improve performance.

Covid-19

All local authorities were impacted by restrictions and illness caused by Covid-19 over the past years. During the period that the letter of 17th January is concerned England was under the restrictions of the 'Second Lockdown' the 'Third Lockdown' and other restrictions. The majority of the period being examined suffered from a variety of 'stay at home' guidance and other restrictions associated with public health. These restrictions had a significant impact on the efficiency of operation of planning application determination. While processes were streamlined as discussed above, during and before this period the ability to undertake some parts of the process, such as site visits and collaborative meetings, was significantly curtailed. This contributed to the backlog noted above and had further impacts on efficiencies as additional processes, such as site risk assessment and review of video submissions, had to be accommodated within the application determination.

These impacts of backlog and inefficiencies were of course exacerbated by staff illness and absence during this unique time.

The planning development management function within the council was particularly challenged in this period as, as a unitary authority Portsmouth City Council has additional responsibilities for public health and social care that some other Local Planning Authorities did not need to prioritise. Capacity to support service improvement or delivery was therefore not available throughout 2021, delaying interventions that might otherwise have improved performance.

Departmental Capacity

It is well documented that all Local Planning Authorities have had challenges with the retention and recruitment of qualified planning staff with a reduction in those taking up the profession as well as a loss of staff to the private sector and early retirement. These challenges are exceptionally acute at Portsmouth due to the coastal location. This effectively reduces the area wherein staff can be recruited by half compared to other urban centres.

During the relevant period covered by the letter of 17th January 2023 Portsmouth City Council has seen the departure of the Head of Development Management, 3 Principal Planning Officers and 3 Senior Planning Officers, as well as the reduction in working hours from staff adjusting to new working patterns or moving towards retirement. Attempts to recruit to replace these posts have been largely unsuccessful leading to ongoing capacity challenges. While temporary staff have been recruited to support the Council this turnover has delayed the embedding of new ways of working introduced through process review and is intrinsically less efficient due to the need to train and support new, temporary staff.

The Council has also attempted to support capacity through outsourcing of applications, to a company called Terraquest, but has not resulted in the outcomes sought within the contract. The contractor's performance, despite being a large and well established consultancy, has been consistently below the expectations of the contract in respect of quality, productivity and customer service.

A focus on recruitment is therefore being corporately supported within the Council to ensure qualified permanent staff can be secured and retained.

Conclusion

Portsmouth City Council recognise and acknowledge, despite notable improvements in median determination times and significant reduction in the backlog of cases open within the service, that improvement is needed in respect of the speed of determination of planning applications, however the Council consider that it is unreasonable and unnecessary to consider designation at this time due to its past underperformance. Key drivers of that underperformance, specifically a historic backlog of applications and restrictions associated with Covid-19, will not have similar impacts in the future and the work for continuous process improvement is already improving the speed of determination and will continue to do so supported staffing capacity being fulfilled. Following the significant reduction of the backlog through the Decision Delivery Drive the amount of time needed to deal with the failure demand arising from having excess cases open has been dramatically reduced allowing more time to be focussed on delivering quality decision making. The lessons learnt from those processes have also been embedded into day to day business with specific management time reserved each week to support decision making and the removal of bottlenecks in those process. The existing service

improvements are therefore considered to result in a sustainable improvement to performance and further improvements to delivery, working with PAS, are being explored.

The corporate focus on recruitment to fulfil this capacity and retain and develop existing staff is a key element to this and designation at this time would have a significant adverse implication for confidence in the service and motivation for qualified planners to remain or come to Portsmouth to deliver this essential function for growth. Furthermore a decision to designate Portsmouth at this time would have a likely reputational impact on the City Council harming the delivery of key growth projects with partners. The challenging development viability within the city has resulted in the City Council playing a significant direct role in the delivery of growth. This is exemplified by a current live significant application for 2,300 homes and 10,000sqm of commercial floor space in the city centre made and supported by the City Council. Development partners are being sought to enable delivery of this scheme once planning permission has been granted later this year and a designation would harm the current positive engagement with partners and funders for this key regeneration project. Similar active engagement with potential partners is occurring for a scheme of similar scale, also promoted by the Council, on a brownfield site at Tipner within the north of Portsea Island. Other projects, including the development of a significant Listed former hospital and 1,000 homes on brownfield land partly owned by Homes England are also being considered under live planning applications and a decision to designate the City Council would have a significant negative effect in the confidence of the delivery agents for those schemes, which rely on partnership working with the Council, resulting in likely delay or prevention of this growth.

The Council intends to complete the final public engagement of its Local Plan, under Regulation 19, in 2023. This will provide clear support and guidance for strategic allocations within the local authority area as well as the framework for encouraging small scale development across the densely populated city. The Plan will focus on removing ambiguity over matters such as nitrate eutrophication, biodiversity and design quality to ensure development can be brought forward more quickly and at a higher quality. During this time of key public engagement and policy change it is considered inappropriate to designate the Council as this is likely to adversely affect community and stakeholder participation in plan making.

Portsmouth City Council believes that the ongoing work to create and embed service improvement and secure staff to deliver good performance mean designation is unnecessary. Past, specific challenges such as a historic backlog of case work created in part by restrictions on approvals associated with nitrate eutrophication and Covid-19 are also exceptional circumstances that suggest that such designation would be unreasonable at this time.

Yours sincerely

Ian Maguire
Chief Planner and Assistant Director for Planning and Economic Growth
Portsmouth City Council

Performance
Graphs



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