

Housing Delivery Test Action Plan

In response to the HDT: 2022 measurement (published December 2023) and HDT: 2023 measurement (published December 2024)

March 2025

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Abbreviations

	Authority Monitoring Report Department for Levelling Up, Housing and Communities
EiP	Examination in Public
GBC	Gosport Borough Council
GBLP	Gosport Borough Local Plan 2011-2029
	(adopted October 2015)
GBLP 2038	Draft Gosport Borough Local Plan 2038
	(Regulation 18)
GBLP 2040	Draft Gosport Borough Local Plan 2040
	(Regulation 19)
HDTAP	Housing Delivery Test Action Plan
MHCLG	Ministry of Housing, Communities and
	Local Government
SoCG	Statement of Common Ground

1 Introduction

Housing Delivery Test (HDT)

- 1.1 The Housing Delivery Test (HDT) was introduced by the Government in 2018 as a monitoring tool in order to speed up the delivery of housing¹. The HDT is an annual measurement of housing delivery in terms of the total number of new houses and flats completed in a local authority area annually. The first HDT results were published in February 2019 and six results have been published in total. Further information on all HDT results for Gosport is set out in Section 2.
- 1.2 The HDT is used to determine the level of consequences applied to the local authority where the delivery of the housing requirement has not been met. The national Planning Practice Guidance (PPG)² provides further details on Government planning policies set out in the National Planning Policy Framework (NPPF), including the Housing Delivery Test measurement. This states where delivery of housing has fallen below the housing requirement, certain policies set out in the NPPF will apply. Depending on the level of delivery these are:
 - The authority should publish an action plan if housing delivery falls below 95%;
 - A 20% buffer on the local planning authority's identified supply of specific deliverable sites if housing delivery falls below 85% in addition to the requirement for an action plan; and
 - Application of the presumption in favour of sustainable development if housing delivery falls below 75%, in addition to the requirements for an action plan and 20% buffer.
- 1.3 These consequences apply concurrently. For example, those who fall below 85% should produce an action plan as well as the 20% buffer. The consequences will continue to apply until the subsequent HDT measurement is published. The relevant consequences for any under-delivery will then be applied. Should delivery meet or exceed 95% no consequences will apply. The NPPF Paragraph 79 sets out that the 'presumption in favour of sustainable development' applies where the HDT falls below 75%.
- 1.4 In line with NPPF Paragraph 11, the primary implication of the presumption in favour of sustainable development for decision takers is that policies which are most important for determining applications are out of date and hence planning permission should be granted unless:

¹ www.gov.uk/government/collections/housing-delivery-test

² www.gov.uk/guidance/housing-supply-and-delivery

- The application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for refusing the development proposed (as set out in Footnote 7 of the NPPF this includes habitat sites, designated heritage assets, and areas at risk of flooding); or
- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.
- 1.5 Due to the presence of internationally important habitats, designated heritage assets, and areas of flood risk, the presumption in favour of sustainable development cannot be automatically assumed in many circumstances.

Housing Delivery Test – Action Plans

- 1.6 Planning Practice Guidance³ sets out that a Housing Delivery Test action plan will identify the reasons for under-delivery, explore ways to reduce the risk of further under-delivery and set out measures the authority intends to take to improve the levels of delivery. In addition the PPG sets out details on who can be involved in the creation of an action plan, the matters that can be analysed to review under-delivery, the types of actions that can boost delivery, and publication and monitoring arrangements. This is reflected in this action plan.
- 1.7 Local planning authorities have an important and longstanding role in planning for and demonstrating a sufficient supply of housing in their area. The Housing Delivery Test (HDT) is one of the Government's initiatives to boost housing growth and to encourage local planning authority's to have a more proactive role in supporting housing delivery in its area, as well as taking accountability for under-delivery. Where delivery falls below 95% of the housing requirement, Councils are required to produce a Housing Delivery Test Action Plan (HDTAP).
- 1.8 It should be noted that the HDT measurement for 2022 was published later than previous years and Government proposals in 2023 suggested that housing requirements could be reduced. Therefore, the Council delayed publication of the HDTAP until further clarity was available. Following proposals for reform in 2024 and the resulting publication of the HDT measurement for 2023 in December 2024, the Council considered it most efficient to publish this combined HDTAP.
- 1.9 Therefore, the production of this combined third and fourth Housing Delivery Test Action Plan (HDTAP) is a direct result of the national HDT measurement for 2022 published by the Department for Levelling Up, Housing and Communities (DLUHC) (since renamed Ministry of Housing, Communities and Local Government (MHCLG))

³ Planning Practice Guidance: Housing Supply and Delivery: www.gov.uk/guidance/housing-supply-and-delivery#housing-delivery-test

on 19 December 2023 for Gosport Borough Council and the HDT measurement for 2023 published by MHCLG on 12 December 2024.

1.10 It should also be noted that the HDT measurement is produced annually and as such this HDTAP will be kept under review and updated accordingly.

Purpose, Aims and Status of the Document

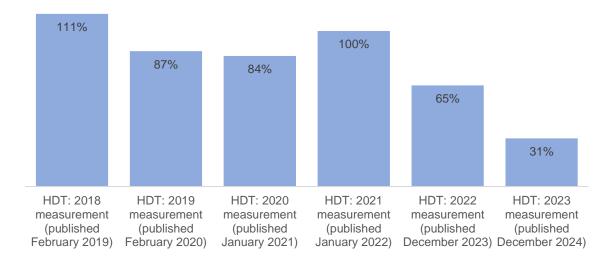
- 1.11 The main aims of the Housing Delivery Test Action Plan are as follows:
 - To provide a summary of the Council's HDT results and its implications;
 - To provide an analysis of the key reasons for the historic under-delivery of new homes in the Borough against its housing requirement;
 - To identify the measures the Council has already undertaken and intends to take to increase and accelerate the delivery of new housing in the Borough; and
 - To identify the monitoring arrangements for the Housing Action Plan.
- 1.12 The Council recognises that delivering growth within the Borough is complex. Whilst it is noted that a number of the actions identified in the Housing Delivery Test Action Plan are principally within the remit of the Council to resolve (such as the production of planning documents and the timely determination of planning applications for housing schemes), the Council will also need support and the co-operation of those involved in delivering new homes including landowners, developers, land promoters, infrastructure providers (such as utility providers) and upper tier authorities (i.e. Hampshire County Council). In addition some complex development matters such as the viability and deliverability of infrastructure may need support from the Government (e.g. flood risk management infrastructure).

Scope of the Housing Delivery Test Action Plan

- 1.13 The remainder of this action plan is structured as follows:
 - Section 2 summarises the Housing Delivery Test (HDT) introduced by the Government and provides a summary of the Council's results and its implications.
 - Section 3 provides a summary of the local housing market and delivery context and endeavours to provide the key reasons for the under-delivery of new homes in the Borough against its housing requirements.
 - Section 4 provides a summary of the key measures the Council intends to undertake in order to improve housing delivery within the Borough.
 - Section 5 provides details of how actions set out in the Housing Delivery Test Action Plan will be implemented, managed and monitored, including any relevant reporting arrangements.

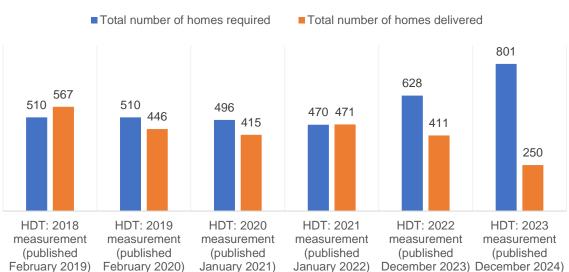
2 Housing Delivery Test Results

2.1 Since its introduction, the following HDT results for Gosport have been published by the Government:



HDT measurements

2.2 It is clear that HDT results for Gosport have deteriorated since the introduction of the HDT. As shown below, the number of houses required has significantly increased. The adopted Local Plan housing figure of 170 dpa is now considered 'out of date' as it is a pre-2018 NPPF Local Plan and is over 5 years old, and therefore the housing requirement has been replaced by the Government's standard method figure. The Borough achieved 100% delivery in the 2021 measurement, 65% in the 2022 measurement, and 31% in the most recent 2023 measurement.



HDT: total number of homes required and total number of homes delivered

PfSH authorities

2.3 For context, the Government's most recently published HDT results for other Partnership for South Hampshire (PfSH) authorities is shown in Table 1. For the most recent HDT: 2023 measurement across PfSH, five local planning authorities (Fareham, Gosport, Havant, Portsmouth, and Southampton) have seen housing delivery fall below 75% and therefore face the 'presumption' consequence, which is an increase on the previous year. Seven authorities are required to produce an action plan due to delivery falling below 95%.

Area	HDT: 2022 measurement	HDT: 2022 consequence	HDT: 2023 measurement	HDT: 2023 consequence
East	112%	None	88%	Action plan
Hampshire				-
Eastleigh	156%	None	122%	None
Fareham	42%	Presumption	55%	Presumption
Gosport	65%	Presumption	31%	Presumption
Havant	71%	Presumption	74%	Presumption
New Forest	92%	Action plan	75%	Buffer
Portsmouth	38%	Presumption	26%	Presumption
Southampton	75%	Buffer	50%	Presumption
Test Valley	189%	None	144%	None
Winchester	154%	None	171%	None

Table 1: PfSH Authorities Housing Delivery Test results for 2022 and 2023

Latest Housing Delivery Test Results for Gosport

HDT measurement 2023, published December 2024

- 2.4 The sixth and current HDT measurement (known as the HDT measurement 2023) was published by the MHCLG on 12 December 2024. The total completions figure between 2020 and 2023 is 250, compared to the requirement of 801 dwellings, and the HDT: 2023 measurement is 31%. The result published in December 2024 confirms that the Council needs to produce this Action Plan and continue to include a 20% buffer on housing supply. The result also confirms that the presumption in favour of sustainable development applies.
- 2.5 Table 2 below outlines the homes required according to the HDT for the three annual periods considered for the latest HDT measurement. The Council recognises that developers in the Borough did not deliver sufficient housing to meet the identified housing need during this period. The Council is therefore seeking to assist and has the ambition to increase both the quantum and speed of new housing delivery within the Borough. Appendix 1 forms part of the response that will aim to facilitate this change.

2.6 In terms of the completions in 2020/21 the government in the latest figure has decided to remove 45 dwellings retrospectively and without consultation to make an adjustment linked to the Census 2021. This has affected a number of councils including, for example, Kings Lynn and West Norfolk, which has 'lost' 343 dwellings. The adjustment is unusual in that it detracts from the measurement which purely measures housing delivery. The Council is aware that other local authorities are seeking clarity from MHCLG and it is hoped further clarity will be provided to ensure the HDT remains robust in its goal of comparing housing supply against the housing requirement.

Years	Homes required according to HDT	Actual Net Completions (C3)	C2 Completions (dwellings equivalent)	Total completions (net)
2020/21	145*	233** (previously correctly reported as 278 – retrospectively changed by a Government adjustment relating to the Census 2021))	0	233** (previously correctly reported as 278 – retrospectively changed by a Government adjustment to the Census 2021)
2021/22	328	19	-20***	-1***
2022/23	328	21	-3	18
Total	801	273	-23	250

Table 2: Housing Delivery Test: 2023 measurement based on net completions between 2020 and 2023 (including Class C2 equivalent completions)

* For the 2023 measurement, there is a reduction in the period for measuring total homes required – usually this would be measured over a 3-year period, but an 8-month period has been used for the 2020/21 monitoring year; requirement is assessed from 1 August 2020, meaning that 243 days are assessed. This is to account for the considerable variations in levels of housing delivery as local planning authorities and construction industry faced disruption on a national, regional, and local level due to the pandemic. No adjustment was made in the 2021/22 and 2022/23 monitoring years. In addition, in accordance with the HDT Technical Note the housing requirement is based on a weighted average between the adopted requirement of 170dpa and the standard method figure of 328dpa due to the GBLP being classed as 'out of date' from 15 October 2020.

** Please note: the completion figures for 2020/21 differ from that previously reported. There were 278 C3 dwellings completed in 2020/21, as included in previous HDT results. However, the recent figures contained in the Government's Live Table 122 (published 2024) was retrospectively changed by a Government adjustment in 2024 relating to the Census 2021, to remove 45 dwellings in the year 2020/21.

*** Please note: the completion figures for 2021/22 differ from that previously reported. Previous Government figures reported the loss of 38 C2 bedrooms (-21 C3 dwellings equivalent using the adjustment which divides C2 bedrooms by 1.8 (i.e. -38 C2 bedrooms divided by 1.8 equals -21 C3 dwelling equivalent). The latest HDT measurement rule book now applies an adjustment to C2 bedrooms by dividing by 1.9. The figures have therefore been revised by the Government for the HDT 2023 measurement (-38 C2 bedrooms divided by 1.9 equals -20 C3 dwelling equivalent).

3 Barriers to Housing Delivery

3.1 In the preparation of this Housing Delivery Test Action Plan a range of key issues have been identified for Gosport that is impacting upon housing delivery. These issues have been identified through emerging evidence for the forthcoming Gosport Borough Local Plan 2040 (previously called the Gosport Borough Local Plan 2038 at Regulation 18 stage⁴) and engagement between GBC Officers in Housing, Development Management and Planning Policy. This section sets out more detail on the barriers to housing delivery that have been identified.

Gosport Housing Land Supply

Five year housing land supply

- 3.2 The latest housing supply position was undertaken on 1 April 2024 and is documented within Council's latest Authority Monitoring Report⁵ (AMR) (published December 2024) and summarised below.
- 3.3 This housing supply position is updated by the Council at least for each monitoring year (which covers the period from 1st April to 31st March) in order to ensure that the Council's housing land supply position remains up-to-date. As part of this process, the Council identifies all dwellings that have been completed during the period, all housing sites where construction is underway and all sites with extant planning permissions (or with a resolution to grant planning permission) as of the 1 April.
- 3.4 Some of the current Local Plan Allocations have, recently, had slower than anticipated delivery on key sites. This is a consequence of site complexity which has had an impact on delivery. A large proportion of the existing planning permissions not yet completed are at Royal Hospital Haslar. The delays in housebuilding on the site account for a proportion of the under delivery over the past 3 years. However, the Council recognises that sustained activity is now taking place at Haslar.
- 3.5 According to the most recent NPPF (published December 2024), local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old (unless these strategic policies have been reviewed and found not to require updating). Where local housing need is used as the basis for assessing whether a five year supply of specific deliverable sites exists, it should be calculated using the standard method set out in national planning guidance.

⁴ In line with Government policy, it has been necessary to extend the plan period of the draft Gosport Borough Local Plan to 2040 to ensure it looks ahead 15 years upon adoption.

⁵ www.gosport.gov.uk/AMR

- 3.6 In addition where the Housing Delivery Test shows there has been significant under delivery of housing over the previous three years (below 85% of the housing requirement), the supply should include a buffer of 20% to improve the prospect of achieving the planned supply. The Government's most recently published Housing Delivery Test 2023 (published December 2024) confirms the Council is required to apply a 20% buffer to its housing supply.
- 3.7 The GBLP was adopted in October 2015 and consequently as of October 2020, its strategic policies are more than five years old. Therefore, local housing need is now calculated using the standard method set out in national planning guidance. A new standard method was published by the Government in December 2024, resulting in a local housing need for Gosport of 442 homes per year, and is used to calculate the five year housing supply throughout this section. For comparison purposes, local housing need according to the previous standard method (prior to December 2024), which showed a requirement for 339 homes per year, is also shown below.

Latest standard method (December 2024)

3.8 As shown in Table 3, when measured against the local housing need according to the most recent standard method of 442 dwellings per year (December 2024) (plus a 20% buffer bringing the requirement to 530.4 dwellings per year), the Council can demonstrate a 2.12 year supply. There are sufficient sites to deliver 1,126 dwellings over the next five years to 2029, compared to the local housing need of 2,652 dwellings (including a 20% buffer).

Table 3: Five year housing land supply based on local housing need according to the
standard method (from GBC Authority Monitoring Report 2024, published December
2024)

FIVE YEAR HOUSING REQUIREMENT: STANDARD METHOD					
Α	Local housing need according to standard method: dwellings per annum	442			
В	Local housing need requirement: 1 April 2024 to 31 March 2029 (A x 5)	2,210			
С	20% buffer (B x 20%)	442			
D	Five year requirement (B+C)	2,652			
Е	Annual requirement for next 5 years (D/5)	530.4			
FIVE YEAR HOUSING SUPPLY					
F	Existing permissions that are expected to be built within the next 5 years	659			
G	Regeneration areas (draft GBLP 2040) without planning permission – includes large site allocations outstanding from	266			

	GBLP 2011-2029 which have been reassessed as part of the draft GBLP 2040	
н	Other allocation sites (draft GBLP 2040) without planning permission (5+ dwellings)	144
I	Small site windfall allowance ⁶	57
J	Total five year supply (F+G+H+I)	1,126
к	Supply in years (J/E)	2.12 years

Previous standard method

3.9 Previously, when measured against local housing need according to the previous standard method of 339 dwellings per year (plus a 20% buffer bringing the requirement to 406.8 dwellings per year), the Council could demonstrate a 2.77 year supply. There are sufficient sites to deliver 1,126 dwellings over the next five years to 2029, compared to the previous local housing need of 2,034 dwellings (including a 20% buffer).

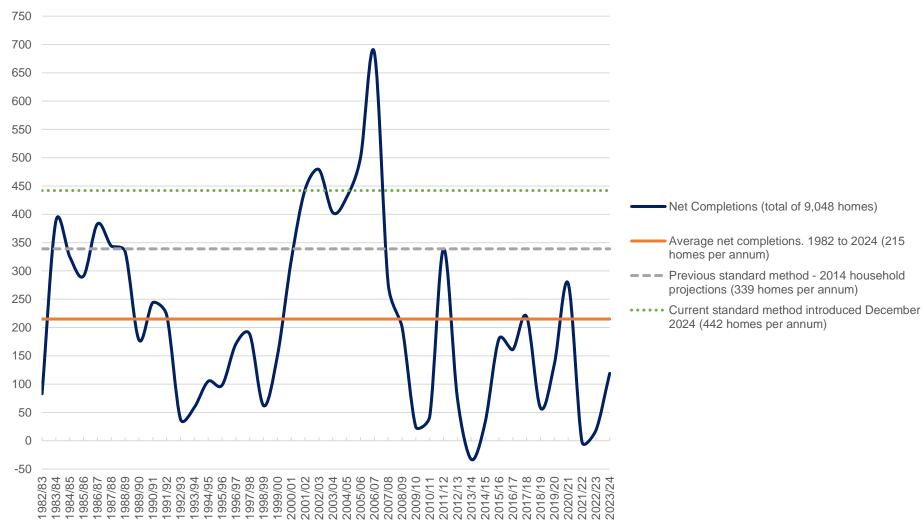
Housing Requirement compared to Housing Completions since 1982

- 3.10 Over the past four decades, Gosport Borough has experienced fluctuations in the number of new homes being built with housing supply primarily influence by the availability of land. In previous years, large scale land releases, primarily by public sector landowners such as the MoD, have seen high housing completions. Before the 2007-08 economic downturn, there was a high number of housing completions in the Borough which outpaced housing requirements. More recently, the number of new houses built has reduced, largely due to wider national economic trends and the type of development land and its availability.
- 3.11 Figure 1 shows the net dwelling completions since 1982. The data shows that:
 - Overall between 1982 and 2024 (42 years) there has been a total of 9,048 net dwelling completions in Gosport Borough, an average of 215 per annum;
 - between 1982 and 1995/96 (14 years) there was a total of 3,092 net dwelling completions, an average of 221 dwellings per annum;
 - in the 15 years from 1996 to 2011 (prior to the current plan period) there was a total of 4,377 net dwelling completions, this averages 292 per annum; and

⁶ This is calculated by taking the average number of completions on small sites (between 1 and 4 dwellings) (including garden sites - see section below for information regarding methodology change) since 2001/02 (i.e. 18.9 dwellings); and multiplied by 3 years out of the 5 years with the next two years instead being the existing small sites with planning permission.

- in the current GBLP plan period (since 1 April 2011), the total number of completions is 1,579 dwellings, an average of 122 per annum.
- 3.12 The Governments latest standard method for determining local housing need requires Gosport Borough to deliver 442 homes per year, compared to the previous standard method which required 339 homes per year. The number of housing completions has only ever exceeded 442 homes in 4 out of the past 42 years.





Housing Completions in Gosport Borough over the past 42 years 1982 to 2024

Infrastructure

- 3.13 GBC is actively engaged in a number of strategic projects to deliver key infrastructure to help facilitate the delivery of new housing. This includes working with the Partnership for South Hampshire (PfSH), Hampshire County Council (HCC) and neighbouring local authorities in pursuing cross border initiatives.
- 3.14 A recent review of existing economic infrastructure provision to, from and within Gosport Borough produced on behalf of the Solent LEP (Gosport Infrastructure Investment Plan) does not highlight any fundamental over-riding constraints in terms of infrastructure provision or capacity constraining short-term development in overall terms. Many smaller-scale infrastructure requirements can be addressed incrementally as new development comes forward.
- 3.15 However, there are some broader infrastructure issues notably ongoing risks associated with tidal flooding / coastal defences, pressures on the Borough's transport networks and the relatively uncompetitive resident skills position which could undermine Gosport's ability to deliver transformative economic growth and change. In addition, these may impose additional costs that impact the financial viability of residential development proposals. The Council considers that external Government investment, particularly into flood defence infrastructure will be required to deliver new development in the Borough.

Access and Transport

- 3.16 A key infrastructure issue for Gosport Borough is improving access to and from the Gosport Peninsula, including better links to Portsmouth and the strategic road network. Enhancing overall accessibility and connectivity to and from Gosport Peninsula, in turn supports the attractiveness of Gosport as a business location. Improvements to strategic highways in the local area such as the Stubbington Bypass (named Daedalus Way) and Newgate Lane have improved accessibility for local people in conjunction with the Bus Rapid Transit scheme which improves connections with Fareham, including its railway station.
- 3.17 However, the traffic levels on the A32 remain consistently high and Gosport remains, as it has for decades, the largest town in terms of population with no railway station. Hence, these access issues remain in part. This also highlights the importance of providing sufficient employment opportunities on the Peninsula to reduce out-commuting and congestion.

Flood Risk Mitigation Infrastructure

- 3.18 Flood risk is a very significant environmental constraint to development in Gosport. The Council's latest Strategic Flood Risk Assessment (SFRA)⁷ shows the main source of flood risk to the Borough comes from tidal flooding⁸. There are significant areas of land that fall within the Environment Agency's defined Flood Zone maps. The areas of the Borough at risk from tidal flooding are areas associated with:
 - Portsmouth Harbour including Forton Lake, Haslar Lake, and Stoke Lake;
 - The Solent including Stokes Bay; and
 - The Alver Valley.
- 3.19 Of these areas, development at the southern end of Portsmouth Harbour including adjacent to Haslar Lake as well as the Solent frontage on the Haslar Peninsula are those where new housing could be potentially delivered in line with the Local Plan. These sites will need to address flood risk in accordance with national guidance and the policies in the Adopted Local Plan and the forthcoming Gosport Borough Local Plan 2040.
- 3.20 Many of the coastal frontages in Gosport are relatively low-lying and are subject to some form of existing coastal defence structure. However, coastal defences in Gosport are also likely to be susceptible to climate change, as 100 years of predicted sea level rise would mean that most defences would fail, at their current level, to offer protection from a 1 in 200 year tidal flood.
- 3.21 In line with this, a number of flood risk evidence studies⁹ set out that to sustain future development in Gosport, particularly in high risk or highly vulnerable parts of the Borough, significant investment in flood defence infrastructure will be required. The Coastal Partners¹⁰ was formed in 2012 and delivers a coastal management service across the coastlines of Chichester, Fareham, Gosport, Havant and Portsmouth authority areas and delivers a range of coastal flood and erosion risk reduction projects which could benefit existing housing and enhancing the shoreline for local communities. For example, coastal defences will be essential to deliver proposals for the Regeneration Areas identified within the Gosport Waterfront and Haslar Peninsula, particularly Fort Blockhouse.
- 3.22 As such, flood defences are considered essential for the delivery of the Local Plan and hence the delivery of housing. The Council including as part of the Coastal Partners will continue to work with relevant organisations on determining

⁷ Available online: www.gosport.gov.uk/GBLP2040

⁸ There have been some historical incidences of flooding occurring form other sources of flooding within the Borough including surface water run-off due to the Borough's predominant urban nature and flooding caused by infrastructure failure (drains).

⁹ North Solent Shoreline Management Plan (December 2010); PfSH Strategic Flood Risk Assessment (Aecom 2024); National Coastal Erosion Risk Mapping (NCERM, February 2025); and the River Hamble to Portchester Castle Flood and Coastal Erosion Risk Management Strategy (2016).

¹⁰ Formerly the Eastern Solent Coastal Partners (ESCP).

both the source of new funding and approximate costs. The scale of the costs of such infrastructure will impact overall site viability and significant external investment will be required to deliver these improvements. The Council will continue to work to secure funding where possible as the availability of funding for flood defences is a crucial requirement for the delivery of the Borough's regeneration ambitions.

Local Housing Market

- 3.23 The Council's latest Demographics and Housing Need Report (JG Consulting, 2024) provides contextual evidence on the local housing market, along with useful information contained in the PfSH Strategic Housing Market Assessment. Key points with regard to Gosport include:
 - The lowest median house price of all the PfSH Districts
 - Gosport is comparatively affordable compared with some Hampshire Districts (Eastleigh, Fareham, New Forest, Test Valley, Winchester & East Hampshire) but less affordable than Portsmouth, Southampton and Havant
 - Demand from HM Forces households based in various training complexes and people working in the Royal Navy supply chain
 - Much of the Borough is away from the M27 corridor and less well connected to employment opportunities along it
 - Parts of Gosport and Fareham can be viewed as a local market
 - Gosport offers an alternative housing offer to Portsmouth; and
 - Lee-on-the-Solent is a popular retirement destination.
- 3.24 In summary, Gosport, whilst part of the larger Portsmouth HMA, has a notable localised housing market with specific factors impacting it. Primarily, the impact of its physical geography a peninsula settlement and the resulting transport challenges will not change without very significant investment to enable a move towards a primary change in modal shift. In addition, the dense urban character of the area (see section below) and comparative lack of developable housing sites results in Gosport having a limited choice in sites. This together with the characteristics of the local housing market can restrict the number and range of developers active in the area, which in itself can impact on delivery.

Environmental Issues

Nitrates

3.25 As of early 2019, the issue of nitrate pollution created a significant barrier to the delivery of housing in South Hampshire including all of Gosport Borough. Natural England's scientific advice to local authorities was that the elevated levels of nitrates within the Solent were causing harm to the ecosystem and the failure of environmental standards within the Solent's Special Protection Areas (SPAs) and Special Areas of Conservation (SACs). Nutrient overloading was creating vast mats

of algae over the Solent's mudflats, stopping oxygen getting through to the organisms in the sediment and causing mass mortality, especially in hot weather. Whilst nutrient pollution arises from a number of sources, particularly agricultural runoff and wastewater outfalls, new dwellings would add to the pressures through the additional waste generated. This meant, that under Habitat Regulations, any new residential development in the Solent could not be permitted unless a robust mitigation scheme was in place which would make the development 'nutrient neutral'.

- 3.26 This initially meant that no homes could be built in South Hampshire without adequate mitigation. This resulted in a number of planning applications being kept 'on hold' until suitable mitigation had been secured. The Council worked closely with its neighbours in PfSH, Natural England, Environment Agency and local mitigation providers to resolve this issue and seek short, medium and long term solutions which protect the environment and allow the delivery of new homes. This included appointing a PfSH Strategic Environmental Planning Officer (SEPO) in December 2019 to coordinate solutions to the nutrient issue on behalf of the sub-region.
- 3.27 Since then the granting of planning decisions has been resumed by the Council, subject to developers securing nutrient mitigation from an approved supplier. This included the redevelopment of Priddy's Hard, which is a priority brownfield site for Gosport, and levered in grant funding to help bring key heritage assets back into use. The Council supported this development by utilising a water efficiency scheme in Council homes to create nutrient mitigation for the new development at Priddy's Hard.
- 3.28 In December 2021 the Council secured its first planning permission which made use of a mitigation supplier with whom the Council had an overarching legal agreement in place with; significantly speeding up the mitigation process and reducing developer costs. This, and other agreements secured since has meant that applications for residential have now been able to be determined.
- 3.29 GBC has continued working with PfSH to implement further nutrient solutions for the Solent. This included securing £9.6m of Government funding in 2024 to deliver a range of nutrient mitigation projects, including the creation of new wetlands and nature reserve areas, improving water efficiency in council homes and upgrading council-owned wastewater treatment plants: https://www.push.gov.uk/2024/03/13/south-hampshire-environment-to-benefit-from-9-6m-funding
- 3.30 In 2020/21 which covered the HDT result for 2021, it was estimated that 50 dwellings were solely backlogged because of the nutrients issue with a further 120 dwellings significantly or principally backlogged because of the nutrients issue. This figure was equivalent to the annual Local Plan requirement (of 170 dwellings) and whilst recognising that these are permissions not completions (which is what the HDT

measures), this may have had some impact on the delivery of new homes in future years.

- 3.31 More recently, the nutrients issue is not considered to be a significant barrier to housing delivery as mitigation is now available. However, the Council recognises that the cost of securing mitigation can impact on development viability which can in turn hinder certain sites being bought forward by the development industry. Section 4 sets out more detail on the current actions aimed to overcome this barrier.
- 3.32 Key ongoing actions related to nutrient mitigation to facilitate house building include:
 - Active involvement with PfSH;
 - Strong support of the PfSH Local Nutrient Mitigation Fund which includes using land in the Stubbington gap for nutrient credits where GBC is the monitoring authority; and
 - Wider water efficiency programme for Council stock which involves £90,000 of Government funding to retrofit Council stock to free up nutrient credits for GBC housing schemes.

Townscape and Landscape

- 3.33 The physical and environmental constraints of the Borough strongly influence its capacity to accommodate new dwellings, with the sea to the south, Portsmouth Harbour to the east and Fareham Borough, with 'strategic gaps', to the north and west. A key challenge is therefore to balance the need for development against the need to minimise the impact on the quality of the natural and built environment in Gosport. The main area of countryside is the Alver Valley Country Park (AVCP) which is Gosport's main green lung and given its importance to the local community is not suitable for housing development. Indeed the AVCP is considered as being of subregional importance and is included in the South Hampshire Green Infrastructure Strategy and is recognised as a Suitable Alternative Natural Greenspace (SANG) due to its ability to deflect recreational pressure from internationally important coastal habitats. In addition much of the Alver Valley is reclaimed land after being used for quarrying then subsequent landfill operations. Consequently the site is protected as a Country Park in the Local Plan and the Council has invested both developer contributions and capital funds in the Country Park.
- 3.34 Additionally, some parts of the Borough are already intensely developed or the local characteristics are such that they make it very difficult to facilitate further significant housing development. For example, there is a predominance of suburban housing with relatively few areas where larger scale growth and change can be easily accommodated. Future housing growth within established suburban areas is likely to be limited to suitable infill plots and changes of use. While the Council is exploring opportunities for larger scale estate renewal which could provide opportunities for net additional housing, this will require significant resources and funding to realise and

consequently will not be evidentially deliverable as per the NPPF in the Local Plan review and will not address short to medium term housing delivery.

Development Viability

- 3.35 Ultimately the barriers expressed above relating to the local housing market including market attractiveness and costs of development determine how viable a development will be and whether the risks are worth taking by a developer. As highlighted above transport and accessibility have an impact on market attractiveness including limiting access to employment opportunities; whilst large on-site infrastructure requirements such as flood infrastructure significantly affect development costs together with issues associated with on-site contamination and neglected historic buildings as well as nature conservation issues that need to be mitigated. The Borough's key brownfield sites have all these issues hence the complexities associated with delivery.
- 3.36 The Adopted Local Plan and the supporting Community Infrastructure Levy (CIL) have been prepared with plan-wide viability appraisals and as such on a general level viability has not previously been a significant Borough-wide issue affecting housing delivery. However, the Council's analysis shows that securing affordable housing has been a significant challenge, with site-specific viability assessment at the planning application stage showing that in some cases it is not viable to deliver a policy compliant level of affordable housing.
- 3.37 There are also some sites within identified regeneration areas which have not come forward in part due to uncertainty with regard to viability. This is linked to necessary policy requirements for the area and specifically flood risk infrastructure to accommodate a provision of residential development and/or other sensitive uses.
- 3.38 Understandably, there have been delays to the determination of some planning applications due to the time involved in addressing complex on-site issues and the negotiation of planning obligations including affordable housing, education and transport contributions. Some of these delays are linked to the processes for appraising planning application viability assessments for example with regard to affordable housing provision.
- 3.39 The requirement to assess viability forms part of the NPPF and is a requirement of the CIL Regulations. As such, the emerging Local Plan 2040 has been subject to a Whole Plan Viability Assessment, this was included as an action to be commenced in the 2021 Action Plan. This action has now been completed and is being considered as part of ongoing work on the Gosport Borough Local Plan 2040 ahead of a Regulation 19 consultation. The findings appear to suggest that viability in the Borough has been more challenging since the CIL Viability Report was produced in 2014. This would confirm the experience that it has been more difficult to secure affordable housing over the latest plan period.

4 Key Actions

Gosport Borough Local Plan allocations and policies

- 4.1 Gosport is responding positively to the challenge of housing delivery. Gosport has very little greenfield land available for potential housing development given that it is heavily urbanised and that the significant open areas it does have, such as for example the Alver Valley Country Park, are of strategic importance to the Borough and the local communities, to provide necessary access to open space without making private vehicular journeys to places further afield. As such, these remaining strategic spaces will not be considered for housing development.
- 4.2 The current Local Plan includes a presumption in favour of development within the urban area boundary which covers the large majority of the Borough and allows additional sites to come forward for development provided it accords with the other policies of the Local Plan which seek to secure a sustainable community.
- 4.3 The Plan identifies several strategic Regeneration Areas (RA) within the urban areas for mixed-use development including new housing development. The RAs prioritise the re-use of previously developed land for mixed-use development primarily including housing, employment, and environmental and access improvements. In addition there are a number of non-strategic housing allocations which help to secure a mix of housing types in the Borough.
- 4.4 The Council is currently reviewing the Local Plan and undertook a Regulation 18 consultation on the emerging Gosport Borough Local Plan 2038 (GBLP 2038) in September 2021. The emerging GBLP 2040 (extended from 2038 to 2040 to ensure it looks ahead 15 years upon adoption) has regard to changes to national planning policy since 2015, new evidence studies, public consultation, and the Partnership for South Hampshire (PfSH) Spatial Position Statement revised in 2023. Further details on both the Adopted Local Plan and the GBLP 2040 are set out on the GBC website¹¹.
- 4.5 The RAs were retained within the GBLP 2038 at the Regulation 18 public consultation in 2021. Each of the RAs identified has their own specific challenges and opportunities. As such, in order to support the delivery of housing for each RA a policy framework in the form of over-arching policy requirements and the identification of specific opportunities within each area has been developed.
- 4.6 In conjunction with housing delivery, designated employment land is retained given that Gosport has the lowest jobs ratio in the South East. As such, current employment land released for housing in Gosport is limited. In recent years land that has been made available for employment use has been built-out and taken-up

¹¹ www.gosport.gov.uk/localplan2029 and www.gosport.gov.uk/gblp2040

relatively quickly suggesting that the demand remains strong for this form of development.

- 4.7 The general housing policies in the adopted Local Plan are continually kept under review to monitor their effectiveness. This is reported through the Authority Monitoring Report¹². To inform this review, the evidence base is currently being updated including the Strategic Housing Land Availability Assessment (SHLAA)¹³. A significant amount of evidence was published as part of the Regulation 18 consultation¹⁴ and is currently being reviewed ahead of a Regulation 19 consultation.
- 4.8 As part of the production of the SHLAA the Council has made proactive attempts to identify additional land for housing. This has included three "call for sites" which comprised targeted requests to agents, landowners and developers. The Council also kept the call for sites open on the GBC website. The third and most recent call for sites was undertaken in 2023 to ensure the Council has an up-to-date understanding of available land with a further call for sites to be undertaken in 2025 prior to the Regulation 19 consultation.
- 4.9 The RAs are proposed to be retained and will remain the main focus of housing delivery in Gosport. The GPLP 2040 will seek to encourage the most efficient use of land balanced against the need to provide development sympathetic to heritage assets and their setting.
- 4.10 As part of the consultation process the Council will continue to consider additional sites for residential development should they become available. However, unfortunately since the Regulation 18 consultation in 2021, some sites are no longer available and consequently this has reduced the availability of land which can be allocated in the Local Plan. This includes Haslar Barracks which is owned by the Ministry of Justice and in 2022 it was announced the site would no longer be released for housing development and would instead be reopened as an Immigration Removal Centre.
- 4.11 The Council is committed to a new Local Plan. In light of the changes to the NPPF in December 2024 the Deputy Prime Minister requested that all local planning authorities produce an updated Local Development Scheme (LDS) within 12 weeks of the publication of the NPPF. The Council is currently considering its revised timetable for Regulation 19 and submission and this will be published in March 2025.

¹² www.gosport.gov.uk/amr

¹³ www.gosport.gov.uk/article/1309/Part-E-Topics-Evidence-Studies-and-Guidance

¹⁴ www.gosport.gov.uk/gblp2038evidence

Supplementary Planning Documents

4.12 The Council has adopted a number of Supplementary Planning Documents (SPD) which support the delivery of housing. In particular the Gosport Waterfront and Town Centre SPD has identified a whole range of sites within the Regeneration Area (as defined in the GBLP) that could come forward for development.

Working with Others

- 4.13 Due to the constraints on land availability outlined in Section 2, the Council works proactively with other local authorities to meet the Borough's unmet housing need. This section summarises the Duty to Co-operate and Statements of Common Ground with regard to housing delivery.
- 4.14 The Localism Act 2011 sets out the statutory framework regarding the duty to cooperate. The duty to co-operate covers a number of public bodies and these are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Further information is contained in the National Planning Policy Framework (NPPF) (paragraphs 24 28, NPPF 2024).
- 4.15 Local authorities are under a Duty to Co-operate with each other and with other prescribed bodies on strategic matters such as housing, economic growth, transport and infrastructure provision which have cross-boundary implications. This needs to be undertaken constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross-boundary matters.

Partnership for South Hampshire (PfSH) and the Spatial Position Statement

- 4.16 In South Hampshire, there is a long history of cross-boundary working between local authorities and their strategic partners. GBC has been a founding member of the Partnership for Urban South Hampshire (PUSH) which was formed in 2003 and renamed the Partnership for South Hampshire (PfSH) in 2019. PfSH includes twelve local authorities and closely collaborates with the Environment Agency, Natural England and other stakeholders.
- 4.17 Work undertaken by PfSH has been a core element in demonstrating collaborative working on strategic cross boundary issues between the various local authorities within the sub-region. The role of PfSH was a critical element cited in the Council's Duty to Cooperate Statement (2014) produced for the Examination in Public for the current GBLP. This sets out how the Council works with its neighbouring partners and other key organisations on common issues. The Duty to Co-operate Statement can be found on the Council's webpage¹⁵.

¹⁵ www.gosport.gov.uk/localplan2029

- 4.18 In June 2016 the South Hampshire Spatial Position Statement was published, it sets out development targets for each Council to 2034. It was based on significant cross-boundary evidence and has assisted local authorities in meeting the duty to cooperate on strategic and cross-boundary matters.
- 4.19 Further work has been undertaken by PfSH on a revised Spatial Position Statement (SPS) which was published in December 2023¹⁶. The revised Statement aims to provide guiding principles for local plans to help deliver sustainable development within South Hampshire. The SPS covers the provision of housing and employment across the sub-region up to 2036. However, given the lead in times for larger sites, it is likely that the key strategic sites that deliver throughout the sub-region will continue to deliver new development well beyond 2036. The SPS therefore provides an overall vision and strategic direction for new development that can be considered up to 2050. As part of preparing the SPS, PfSH also agreed a Statement of Common Ground.
- 4.20 The PfSH SPS 2023 considered local housing need using the standard method in place at the time (the previous standard method based on 2014-based household projections and 2023 affordability). In 2024, the new Government set out reforms to build 1.5 million homes over the five year parliament. This includes a revised standard method mandating local authority housing requirements that raises the overall annual target from around 300,000 to approximately 370,000. This new standard method results in a substantial rise in local housing need across the PfSH area, rising from approx. 6,000 to 7,700 homes per annum, and beyond that considered in the recent PfSH SPS.
- 4.21 The Government has also announced plans to move towards a universal system of strategic planning with the development of Spatial Development Strategies within the five year parliament¹⁷. In the medium term this could assist in meeting housing needs across Hampshire, however, in the short term, meeting the higher housing numbers from the revised standard method is likely to be challenging for many PfSH authorities.

Other Statements of Common Ground

4.22 Other Statements of Common Ground (SoCG) are being prepared and will be maintained on an on-going basis throughout the plan making process. The advice in the national Planning Practice Guidance (PPG) is that as a minimum these statements should be published when the area covered and the governance arrangements for the co-operation process have been identified and the substantive matters to be addressed have been determined. The SoCG can then be used to identify any outstanding matters that will need to be addressed and the process for

¹⁶ www.push.gov.uk/work/planning-and-infrastructure/push-position-statement/

¹⁷ www.gov.uk/government/publications/english-devolution-white-paper-power-and-partnership-foundationsfor-growth/english-devolution-white-paper

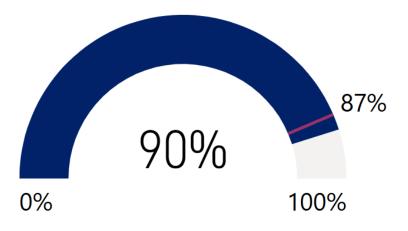
reaching agreements and where possible an indication of when such statements are likely to be updated.

- 4.23 The Council has signed a SoCG with its neighbour Fareham Borough Council relating to the Fareham Borough Local Plan 2037 in February 2022 and this is available online (FBC039):
 - www.fareham.gov.uk/planning/local_plan/examination/examinationlibrary.aspx
- 4.24 The Council has signed a SoCG with its neighbour Portsmouth City Council relating to the Pre-Submission Portsmouth Local Plan in July 2024 and this is available online:
 - www.portsmouth.gov.uk/services/development-and-planning/planningpolicy/portsmouth-local-plan-evidence/#reg19
- 4.25 It is currently anticipated that significant progress will continue to be made on further Statements of Common Ground, which will be published as part of the Regulation 19 consultation and future Local Plan Examination in Public.

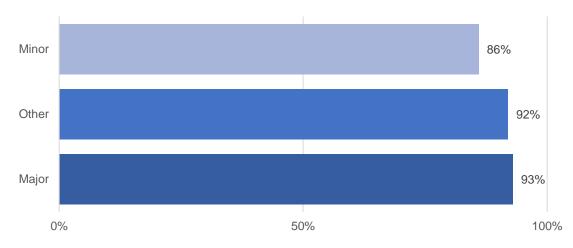
GBC Development Management Processes

- 4.26 The Council has not identified Development Management (DM) planning processes as a barrier to housing delivery. However, it is recognised the importance of monitoring its performance and addressing any issues that may arise.
- 4.27 Government statistics¹⁸ show that the Council's performance and speed of decision making over the period since the introduction of the HDT in 2018 is good with 90% of planning applications decided in time, compared to 87% in England, and that any delays are within an acceptable limit. As such, the Council is content to conclude that it has efficient decision making processes in place.

Percentage of applications decided in time compared to England (2018 to 2024 Q2)



¹⁸ MHCLG, PS2 data: www.gov.uk/government/statistical-data-sets/live-tables-on-planning-applicationstatistics



Percentage of applications decided in time by development type (2018 to 2024 Q2)

Percentage of applications decided in time (2018 to 2024 Q2)

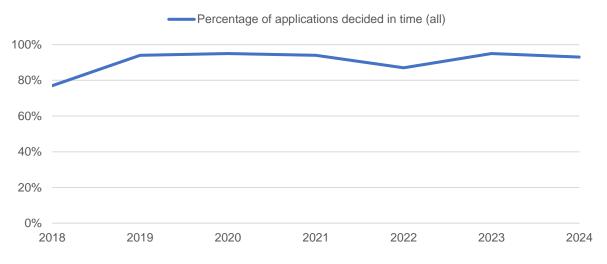


Table 4: Planning applications determined in time since the introduction of the HDT

Year/Period	Major	Minor	Others	Total Applications decided in time	Total Applications decided in time (Percent)
2018	100%	67%	80%	228	77%
2019	100%	91%	96%	271	94%
2020	100%	86%	95%	264	95%
2021	83%	92%	95%	334	94%
2022	80%	86%	88%	245	87%
2023	100%	93%	94%	249	94%
2024 (Q1 & Q2)	67%	96%	93%	114	93%
Total	90%	87%	92%	1,705	91%

Source: District planning application statistics (PS2) - full dataset, MHCLG¹⁹

4.28 There are a number of major development sites that are due to come forward over the draft Local Plan period to 2040. In order to ensure that these are dealt with in the most efficient manner the Council appointed an additional Planning Officer with responsibility to provide detailed pre-application advice, enter into early stage negotiations in respect of s106 Agreements and liaise with other Council departments and other stakeholders. The aim is to ensure that the application process through to decision making is as smooth as possible by providing continuing and greater certainty for all parties involved.

Nutrient mitigation measures

- 4.29 As highlighted above, as of early 2019, the issue of nitrate pollution created a significant barrier to the delivery of housing in South Hampshire including all of Gosport Borough. The Council continues to work proactively to secure appropriate mitigation both unilaterally and multi-laterally through PfSH. Actions have included:
 - Retrofitting of water efficiency measures in Council housing stock to safeguard Heritage Lottery Funding and other external funding to deliver a mixed use scheme including residential development at Priddy's Hard. Further retrofitting measures is being used to mitigate GBC housing schemes.
 - Negotiations with landowners to secure 'nitrate credits' by off-setting agricultural land. Schemes include land secured by the Hampshire and Isle of Wight Wildlife Trust as well as private landowners. A list of appropriate schemes which have satisfied Natural England are available on the Council²⁰ and PfSH²¹ websites. Developers are directed to these schemes to start negotiations to purchase the relevant credits. A number of developers in the Borough have used such schemes. This is necessary in order to ensure relevant compliance/enforcement measures are in place.
 - The Council contributes to a dedicated team called the PfSH Strategic Environmental Planning Team who derive and manage relevant solutions for the PfSH area. The team are available to provide advice to developers about how appropriate mitigation can be secured in the area and has been successful in supporting strategic schemes which maximise the environmental benefits of nitrate credits.
 - Arrangements secured with Homes England to utilise agricultural land outside the Borough to enable housing to take place at Daedalus.
 - GBC has continued working with PfSH to implement further nutrient solutions for the Solent including the Local Nutrient Mitigation Fund. This included securing £9.6m of government funding in 2024 to deliver a range of nutrient mitigation projects, including the creation of new wetlands and nature reserve areas,

¹⁹ www.gov.uk/government/statistical-data-sets/live-tables-on-planning-application-statistics

²⁰ www.gosport.gov.uk/article/1888/Nutrient-Neutrality

²¹ www.push.gov.uk/work/mitigation-schemes-available-to-developers/

improving water efficiency in council homes and upgrading council-owned wastewater treatment plants: https://www.push.gov.uk/2024/03/13/south-hampshire-environment-to-benefit-from-9-6m-funding

Heritage Action Zone (HAZ)

- 4.30 Following a bid to Historic England in August 2018, Gosport Borough Council was successful in its application for Heritage Action Zone (HAZ) status. Through the Heritage Action Zone, Historic England and Gosport Borough Council worked with local partners to deliver and implement a programme of support²².
- 4.31 Projects related to increasing housing delivery included:
 - Feasibility reports on difficult heritage sites to understand development costs and opportunities; and
 - Projects to improve the sense of place and encourage investment in the Borough.
- 4.32 Work is now underway to produce a HAZ Legacy Plan to deliver further heritage projects and the opportunity to facilitate regeneration on historic sites including the development of new homes. Information on the HAZ can be seen online: www.gosporthaz.org.uk Further information is also available online at Historic England: www.historicengland.org.uk/services-skills/heritage-action-zones/gosport/

High Street Heritage Action Zone (HSHAZ)

4.33 Gosport Borough Council also worked in partnership with Hampshire Cultural Trust to secure 'High Street Heritage Action Zone' (HSHAZ) status for the Gosport High Street and Stoke Road Conservation Areas. As a result, the area received government funding of £1.78 million for the implementation of a four year multi project programme agreed with Historic England. A full overview of the HSHAZ programme and its projects, along with the most recent progress²³ can be found online: www.gosporthaz.org.uk

Gosport Taskforce

4.34 The Gosport Task Force was set up in 2016 to consider the potential growth opportunities that could be realised as a result of the disposal of various public sector sites in the Borough. Such sites provide an opportunity to accommodate a new phase of Gosport's growth, and local stakeholders are keen to maximise the potential of this portfolio of sites to encourage transformative economic development and growth.

²² For full details relating to the timetable for individual project delivery see the Infrastructure Delivery Plan www.gosport.gov.uk/infrastructure

²³ For full details relating to the timetable for individual project delivery see the Infrastructure Delivery Plan www.gosport.gov.uk/infrastructure

4.35 The Task Force is chaired by Dame Caroline Dinenage MP and includes representatives from Gosport Borough Council (Councillors and officers), Hampshire County Council, the Defence Infrastructure Organisation, senior officers from local bases, the MoJ, the Solent LEP and One Public Estate. It aims to help facilitate investment in Gosport by looking at ways to remove barriers to delivery.

One Public Estate

- 4.36 One Public Estate (OPE) is an established national programme delivered in partnership by the Office of Government Property (OGP) within the Cabinet Office and the Local Government Association (LGA). It provides practical and technical support and funding to councils to deliver ambitious property-focused programmes in collaboration with central government and other public sector partners. GBC has worked with OPE with the aim of finding long-term development solutions to a number of MoD owned sites in Gosport including Blockhouse and HMS Sultan. This has included OPE funding towards technical studies aimed at facilitating the redevelopment of Blockhouse for a mix of uses including new homes.
- 4.37 The Council will continue to bid for additional funding which can assist in de-risking complex sites in the Borough and ultimately making them more attractive for development investment and overall site viability. It will also seek further rounds of Brownfield Land Release Funding to help de-risk Council owned sites for housing. The Council is currently awaiting a Government announcement on the arrangements for future rounds.

Levelling Up Funding – 'Reconnecting Historic Gosport Waterfront'

- 4.38 On 20 November 2023, the Council was awarded £18,117,915 from the UK Government's Levelling Up Fund (Round 3) after a successful bid which built on work undertaken by the Council on the Gosport Waterfront and Town Centre Supplementary Planning Document.
- 4.39 Whilst the LUF funding will not directly deliver new housing, it is hoped that the regeneration of the historic waterfront will help unlock development sites in the area by improving connectivity and economic prosperity. This may help to improve the attractiveness and viability of brownfield land in the area for prospective developers by increasing investor confidence in the area.
- 4.40 This funding aims to preserve and enhance Gosport's unique heritage while promoting economic growth, connectivity and tourism. Key components of the project include:
 - **Restoration of the Rum Store** the Grade II listed Rum Store, located at Royal Clarence Yard, is a key part of the project. Derelict for many years, this historic building will be renovated to provide nearly 7,000 square metres of mixed-use commercial space mainly for maritime businesses. Other units are earmarked for

retail and leisure, including a possible rooftop terrace bar and restaurant with views across Portsmouth Harbour. It is hoped this will create new job opportunities while preserving and enhancing the building. The wider Victoria Quays site will be opened up as part of the Gosport Waterfront Trail, linking with Royal Clarence Yard.

- **Improved connectivity** funding will be used to revitalise and maximise the potential of the town's waterfront with the Gosport Waterfront Trail. This will includes connectivity and infrastructure improvements between key landmarks, public spaces, and the Waterfront for pedestrians and cyclists. It will also include street greening and integration. The story of Gosport's heritage and how sites link together with the essential role of supplying and servicing the Royal Navy, and defending the country, will be better told through place making improvements and heritage preservation.
- Economic regeneration and tourism the project will help to improve footfall and dwell time, provide new employment floorspace at the Rum store and improved connectivity with Royal Clarence Yard. It is hoped this will complement Council plans for the former bus station site, assist museum sites, and increase direct and indirect spend in the area.

Social and Affordable Housing Development Strategy

- 4.41 The Council agreed to undertake a building programme of new social and affordable housing within the Borough with the initial aim of building 100 houses, subject to land availability and planning permission. GBC Planning worked with GBC Housing to prepare a list of potential housing sites. This programme was agreed by the GBC Community Board of 22 January 2020 with further revisions in 2021.
- 4.42 GBC Members acknowledged that the proposal would provide much needed affordable houses as the waiting list for those with housing needs was currently over 1000. The Board was advised that the properties would be eligible for right to buy but that subject to the right to buy affordability rules it would potentially not be for 15 years. The Community Board was also advised that there is the potential for specific units to be allocated to those with particular disability needs including family sized accommodation that would exempt the properties from being available under the right to buy scheme. It was accepted by the Community Board that difficult decisions may need to be made with regard to the use of any land for the construction of additional properties, but recognised the need for such properties was significant in the Borough.
- 4.43 The Council's Housing Department progressed the schemes through the design stage and planning process and the first tranche of GBC Housing schemes are currently under construction. This will provide a total of 15 homes, these are: five dwellings at Land at Wheeler Close, Gosport (planning application 22/00500/GR3); seven dwellings at Land at Stoners Close, Gosport (planning application

22/00501/GR3); and three dwellings at Land at Glebe Drive, Gosport (planning application 22/00503/GR3).

Other GBC land including car parks

- 4.44 In addition to the sites identified above further Council sites could come forward for development. This includes further investigations as part of the evidence base for the emerging Gosport Borough Local Plan 2040.
- 4.45 Across the GBC area there is also a need to provide an updated strategic approach to car parking provision to ensure that excess capacity can be considered corporately. Since the publication of the last HDTAP, the Council commissioned consultants who have undertaken a Car Parking Study which assesses capacity in the Gosport Town Centre area.
- 4.46 The principal of development on certain car parks has been established in the Gosport Waterfront and Town Centre SPD and the Council is currently producing a Car Parking Strategy which will set out a detailed approach to potential site releases.

Brownfield Land Register

4.47 Local authorities are required to publish an annual list of brownfield land (previously developed land) in their area that may be suitable for development. The Council has published a Part 1 Brownfield Land Register which is a list of brownfield land that is considered suitable for residential development²⁴. Part 2 of the Register are sites which have been granted permission in principle. There are currently no sites in Gosport which have been granted permission in principle and therefore Part 2 has not been published. The Council as part of any pre-application discussions ask potential landowners of suitable sites whether they wish their site to be added to the Brownfield Land Register (acknowledging the issue of commercial confidentially). Inclusion on the site could assist landowners in finding interested developers.

²⁴ www.gosport.gov.uk/article/1215/Brownfield-Land-Register

Improving Infrastructure

- 4.48 GBC and other organisations including Hampshire County Council (HCC) as the Local Transport Authority, are working on a number of projects to improve infrastructure in Gosport and hence remove barriers to housing delivery.
- 4.49 The Council's Infrastructure Assessment Report, Infrastructure Funding Statement and Infrastructure Delivery Plan (available online: www.gosport.gov.uk/infrastructure) set out various actions that the Council and other providers are undertaking to improve utilities, facilities and other infrastructure in the Borough which will make the area more attractive for investment, facilitating new homes and new jobs. Recent key infrastructure matters are set out below.

Gosport Infrastructure Investment Plan

- 4.50 The Solent LEP prepared an Infrastructure Investment Plan (IIP) for Gosport Borough²⁵. This identifies future 'economic infrastructure' needs of the Borough i.e. the infrastructure that is typically required to support the day-to-day functioning of an economy such as transport, telecommunications, energy, water, waste and flood defence and workforce skills. This recognises a number of overarching investment priorities including:
 - Significant investment in flood defences at key regeneration sites such as Blockhouse to enhance their viability for development;
 - Renewable energy to help power residents and businesses in Gosport
 - Investment in transport improvements including the road network, expanded water-based transport services and an extended Bus Rapid Transit system
 - A roll-out of the next generation 5G and full fibre network to enhance the Borough's attractiveness to investors
 - Improvement in human capital and skills to increase include marine training.

Local Highways Authority

4.51 The Stubbington bypass forms part of HCC's wider plan for improving access to Fareham and Gosport and was opened in May 2022. Other delivered schemes include the Newgate Lane corridor, the Peel Common roundabout, sections of the A27 between Segensworth to Titchfield and at The Avenue/Station Roundabout/Western Way. The Stubbington bypass improves journey times and reliability on the Gosport Peninsula and helps remove barriers to growth and encourage investment and regeneration, particularly at the Solent Enterprise Zone at Daedalus. As part of work on the Gosport Borough Local Plan 2040, GBC is currently undertaking a Transport Assessment which will identify where future improvements to the highway network may be required.

²⁵ www.investingosport.co.uk/infrastructure-investment/

Gosport Interchange Improvements and Transforming Cities Fund

- 4.52 In September 2018, Portsmouth City Council (PCC) and HCC were one of twelve city regions shortlisted to bid for a share of the Department for Transport's £1.28 billion Transforming Cities Fund. This fund is for public transport improvements across South East Hampshire. Further detail of the SEHRT is set out on their website²⁶.
- 4.53 The DfT released two waves of funding for the Transforming Cities Fund. This included £1.4m allocated towards delivering the extension of the existing Eclipse bus route in Gosport south from the Hutfield Link to a new junction with Rowner Road this project was completed in December 2021²⁷. Further funding included £5.2 million allocated to improving Gosport's transport interchange facilities, which includes the re-location of the bus station, taxi rank and drop-off/pick-up and short stay parking facilities to provide a modern transport interchange. It also involved highway changes including the provision of a bus-only link across the High Street between North and South Cross Street, which brings bus services into the heart of the Town Centre. The new interchange opened in October 2024.

Flood Risk Infrastructure

- 4.54 The Council acknowledges that to sustain future development patterns in Gosport, significant investment in flood defences and flood defence infrastructure will be required. The Coastal Partners published a Coastal Flood and Erosion Risk Management Strategy (CFERMS) for the stretch of the Solent coast from the River Hamble to Portchester in March 2016 and this covers the entirety of Gosport Borough's shoreline. Of specific relevance to Gosport are Strategy Management Zones 2 (Fareham and Gosport) and 3 (Lee-on-the-Solent and Stokes Bay).
- 4.55 The CFERMS identifies a series of 'priority areas' targeted at those areas of this stretch of coastline with the most significant flood and erosion risk and the greatest need for coastal defence works. A number of schemes are identified for each priority area that is considered necessary to alleviate the flood and erosion risk. The strategy notes that in some key areas of Gosport, where defence heights are lowest, there is a significant risk of tidal flooding from the present day. The preferred strategic approach therefore involves a phased implementation of new defences including capital works, softer options (to encourage and build up the existing natural defence, such as vegetation management and planting) and maintenance of existing defences. The strategy also acknowledges that aspirations to redevelop and regenerate parts of Gosport Borough means that new coastal defences have an important role to play in supporting these wider initiatives, for instance at the key development site Fort Blockhouse. **Significant flood defence infrastructure is**

²⁶ www.sehrt.org.uk/

²⁷ www.hants.gov.uk/transport/transportschemes/brtphaseII

likely to be required on the Haslar peninsula with the precise nature and scale still to be determined.

4.56 The Coastal Partners are delivering a number of schemes in the Borough which while they are designed to protect existing residential development they will help facilitate the development of small parcels of land within the various catchment areas by improving flood defences (e.g. the Solent Brickworks). Further information about these schemes can be found on the CP website at: www.coastalpartners.org.uk/authority/gosport

5 Conclusions

- 5.1 Appendix 1 sets out a range of short and medium term actions which aim to increase the delivery of new homes in the Borough. It also identifies timescales and responsibilities for delivery of the actions, where appropriate. Monitoring of the actions is undertaken annually following receipt of the annual HDT measurement and the annual review of the Action Plan draws on information from a range of sources including the annual housing completions surveys (which provides figures for the number of new homes completed each year) and other relevant documents.
- 5.2 In terms of barriers to housing delivery, GBC has identified the following key issues:
 - Gosport is almost entirely either urbanised or comprising open spaces of strategic importance entirely unsuitable for housing development. Consequently there is a limited supply of sites available for housing and as such the Borough is reliant on a significant amount of housing need being met elsewhere in the South Hampshire sub-region or beyond;
 - Gosport retains significant MoD land holdings the future of which is for either a continuation of military use or potential release for redevelopment. Where MoD land has come forward for redevelopment in the past the delivery of housing on these years takes significant periods of time i.e. a much greater timespan than the three years the HDT is comprised of. The planned release of MoD land is sometimes unclear to the LPA despite constructive and positive working relationships;
 - Sites that are released are extremely complex which affects the overall investment viability. Issues include contaminated land, the need for improved flood defences and neglected heritage assets which require significant investment;
 - Gosport has a significant number of designated heritage assets, primarily associated with the town's naval history, and many of which are on military land or in a poor state or both. The Council has been involved in a number of initiatives related to the historic environment that aim to increase investor confidence in the area as well as feasibility studies investigating how historic assets could be re-used as part of mixed-use sites which can deliver new housing (including HAZ, HSHAZ, UK Shared Prosperity Fund, One Public Estate).
 - Gosport has the lowest jobs ratio (employment to population) in the South East of England and hence there is a strategic need to retain designated employment land for commercial use. As such, the delivery of housing from employment land is likely to be limited.
- 5.3 Despite these issues the Council is content that it is both cognisant of these issues and is working constructively, usually in partnership with third parties, to resolve them with the aim of improving housing delivery. Where necessary actions will be updated,

or new actions added in response to currently unforeseen issues or barriers to development, or as a result of changes in government policy, legislation or planning practice guidance. Close working relationships with infrastructure providers, developers and other key stakeholders will be key to ensuring a step change in increasing housing supply locally.

Appendix 1: Gosport Housing Delivery Test Action Plan 2025

lssue	Evidence	Action	Who/When	Action Achieved and Comments
Strategic Issue: Gosport	Housing Land Supply			
Local Plan Allocation Sites	Some sites in the Local Plan have not come forward as anticipated affecting future housing supply. As a result the Council is currently unable to demonstrate a five or ten year housing land supply against the adopted Local Plan housing requirement (170 dwellings per annum) (nor the latest standard method requirement of 442 homes per annum).	Allocations to be reviewed through Local Plan. Develop and strengthen our working partnership with Homes England to take advantage of funding opportunities to deliver Local Plan Allocations. Continue working with One Public Estate and Defence Infrastructure Organisation to deliver public sector owned land for mixed-use.	GBC Planning and Regeneration	Ongoing Since the previous HDTAP engagement with the DIO has been ongoing. The DIO are producing a masterplan ahead of releasing the Blockhouse site. It is likely that significant external funding will be required to deliver flood risk mitigation including improvements to the Haslar sea wall.
Housing Land Supply	Prior to the introduction of the standard method by the Government in 2018, there had been sufficient land to meet the adopted Local Plan housing targets (170 dwellings per annum) but the adopted Plan is now considered 'out of	Prepare Local Plan 2040 for Regulation 19 consultation and identify new housing allocations (both strategic and non- strategic). Continue work on studies including	GBC Planning and Regeneration	Ongoing Since the previous HDTAP, a Regulation 18 consultation on the Local Plan 2038 was undertaken in late 2021, the Council is now progressing towards a Regulation

Issue	Evidence	Action	Who/When	Action Achieved and Comments
	date' as it is more than five years old. Housing requirements are now based on the Government standard method which creates a major uplift and step change in housing delivery requirements. The annual housing requirement increased from 170 per year to 339 per year and has now increased to 442 homes per year due to the revised standard method introduced in December 2024. Evidence does not identify sufficient land to meet the Government's standard method requirement.	Strategic Housing Land Availability Assessment (SHLAA) and evidence on market demand. Undertake a further 'call for sites' consultation to update the Council's understanding of land availability. Regular Brownfield Land Register updates.		19 consultation in 2025. The Council regularly updates the Brownfield Land Register. The Council undertook a third 'call for sites' and is undertaking a fourth 'call for sites' in 2025.
	Ongoing dialogue between GBC and site promoters to speed up delivery on sites with existing planning permission	The Council has, and will continue to, take a proactive approach to towards working with these external parties to assist in the delivery of these allocation sites to support the future	GBC Planning and Regeneration	Ongoing The Council has also continued engagement with key site promoters including those developing Haslar

Issue	Evidence	Action	Who/When	Action Achieved and Comments
		improvement of its housing land supply. This includes both pre- application discussions and post consent dialogue where necessary.		Hospital and is now considering the final reserved matters proposal for the site which will facilitate the build-out of housing on the site.
	Delivering new housing through the re-use of heritage assets	Working with partners to review release of public sector assets for mixed-use regeneration. Implementation of Heritage Action Zone and High Street Heritage Action Zone. Work with landowners to encourage land assembly options and	GBC Planning and Regeneration	Ongoing The Heritage Action Zone and High Street Heritage Action Zone were implemented and the Council is now working to implement a HAZ Legacy.
	Sites with existing uses	use of surplus sites. A new GBC Car Study and a Car Parking Strategy.	GBC Streetscene and GBC Planning and Regeneration	Since the previous HDTAP, the Council commissioned consultants who undertook a Car Parking Study. The Council is now considering this and is producing a Car Parking Strategy which will be published in 2025 and

Issue	Evidence	Action	Who/When	Action Achieved and Comments
	Potential for residential redevelopment of Council housing stock i.e. obsolete flats, under-utilised GBC land.	Social and Affordable Housing Development Strategy	GBC Housing GBC Planning and Regeneration	Commentsmakerecommendations onpotential sites whichcould be released forhousing development.OngoingThe Council continuesto identifyopportunities andconsider how theycould be
				implemented. There remains significant viability challenges to delivering such schemes and the Council alone does not have sufficient financial resources to implement large schemes. The Council will work with bodies such as Homes England to progress Council house redevelopment projects where funding and support is forthcoming.
Progress with Duty to Co-operate and sub-	The Partnership for South Hampshire agreed a revised	The Council will continue to work with PfSH to address	Partnership for South Hampshire	Ongoing

Issue	Evidence	Action	Who/When	Action Achieved and Comments
regional Strategic Planning	Spatial Position Statement in December 2023 which addresses housing distribution and unmet housing need. This is based on the previous standard method and the introduction of the revised standard method in December 2024 requires a significant uplift in housing delivery in the sub-region.	strategic planning matters	South Hampshire Local Authorities	
	A SoCG has been agreed between GBC and Fareham Borough Council (FBC). A SoCG has been agreed between GBC and Portsmouth City Council (PCC).	The Council will keep SoCGs under review and produce further SoCGs where required.	GBC Fareham Borough Council Portsmouth City Council Other bodies including the Environment Agency, Natural England and Historic England.	SoCGs completed since previous HDTAP. Further SoCGs to be agreed prior to Regulation 19 and Examination in Public.
Strategic Issue: Infrastru				
Strategic infrastructure	Local Plan evidence	Prepare Gosport Local	GBC Planning and	Ongoing
required to support housing development	identifies deficiencies in strategic infrastructure	Plan and evidence base including the	Regeneration, Infrastructure providers	A Regulation 18
	which holds up housing development. This is	Infrastructure Assessment Report and		consultation on the Local Plan 2038 was

Issue	Evidence	Action	Who/When	Action Achieved and Comments
	particularly in relation to flood risk mitigation.	Infrastructure Delivery Plan which confirms funding sources and delivery mechanism for key infrastructure.		<i>undertaken in late 2021, the Council is now progressing towards a Regulation 19 consultation.</i>
	Sources of funding will be required to deliver strategic transport infrastructure.	Continued engagement with Transforming Cities Fund and other transport funding with aim of securing funding for strategic infrastructure improvements.	Portsmouth City Council (PCC) and Hampshire County Council (HCC). Infrastructure providers	Significant funding has been utilised to deliver strategic transport improvements including Newgate Lane and the Stubbington Bypass which improve access to the Peninsula. The Gosport Transport Interchange has also been completed.
	Sources of funding will be required to deliver strategic flood risk mitigation infrastructure.	Continued partnership working to determine extent of the flood risk infrastructure needed to deliver the Local Plan 2040 spatial strategy, and in particular the Blockhouse site.	GBC Planning and Regeneration, Coastal Partners, Environment Agency, Defence Infrastructure Organisation	Ongoing There has been increasing costs on FCERM schemes as detailed in this report. The CP have been seeking funding to ensure the Alverstoke and Seafield schemes can be delivered.

lssue	Evidence	Action	Who/When	Action Achieved and Comments
	Sources of funding will be required to de-risk sites to make them more attractive for investment and improving overall viability (such as addressing	The Council will continue to apply for external funding (such as that successfully awarded from the Levelling-Up Fund).	GBC with relevant partners as stipulated in application criteria.	Significant external funding will likely be required to deliver flood risk mitigation for the Blockhouse site. The Council is working with the DIO and Environment Agency to understand mitigation requirements, this will enable a full understanding of costs and potential funding sources. Ongoing Since the previous HDTAP the Council has recruited a Funding Officer to assist in identifying and securing funding
	contamination, site clearance etc.)			from external sources.
Strategic Issue: Develop				
Attractiveness of sites due to viability concerns	Some sites are less attractive to develop due to viability concerns and the requirement for infrastructure	GBC itself and as part of PfSH and other partnerships will continue to lobby Government to ensure complex brownfield	GBC Planning and Regeneration	Ongoing

Issue	Evidence	Action	Who/When	Action Achieved and Comments
Issue Identifying developable sites and Whole Plan Viability Assessment implications	Evidence Determination of deliverable strategic sites in Local Plan Review	Action sites can attract significant Government investment to de-risk sites and make them more attractive to investors and developers and thereby unlock the significant potential of these sites. Whole Plan Viability Assessment	Who/When	
				<i>delivery of key sites in the Local Plan has resulted in a</i>

Issue	Evidence	Action	Who/When	Action Achieved and Comments
				significant delay to the Local Plan Review.
				The Council will be undertaken an advisory visit with the Planning Inspectorate in 2025, prior to progressing the Local Plan to Regulation 19 and ultimately submission.
Strategic Issue: Environ	ment			
Nutrient Neutrality	Initial effective suspension of housing consents without Natural England approved mitigation.	Produce South Hampshire Environmental Strategy Create Solent Nutrient Fund and continue third party land offsetting initiative	GBC Planning and Regeneration and other South Hampshire LPAs	Actions completed since previous HDTAP. The PfSH Strategic Environmental Planning Team continues to work on behalf of the Council to ensure sufficient nutrient mitigation credits are available within the catchment area. This has seen the establishment of the PfSH Local Nutrient Mitigation Fund. An effective mechanism is therefore in place to deliver housing.

Appendix 2: Previously published HDT results

HDT measurement 2022, published December 2023

- 1.1 The fifth HDT measurement (known as the HDT measurement 2022) was published by the DLUHC (now renamed MHCLG) on 19 December 2023. The total completions figure between 2019 and 2022 is 411, and the HDT: 2022 measurement is 65%. The result published in December 2023 confirms that the Council needs to produce this Action Plan and include a 20% buffer on housing supply. The result also confirms that the presumption in favour of sustainable development applies.
- 1.2 Table 5 below outlines the homes required according to the HDT for the three annual periods considered for the latest HDT measurement. The Council recognises that developers in the Borough did not deliver sufficient housing to meet the identified housing need during this period. The Council is therefore seeking to assist and has the ambition to increase both the quantum and speed of new housing delivery within the Borough. Appendix 1 forms part of the response that will aim to facilitate this change.

Years	Homes required according to HDT	Actual Net Completions (C3)	C2 Completions (dwellings equivalent)	Total completions (net)
2019/20	156*	135	0	135
2020/21	145**	278	0	278
2021/22	328	19	-21	-2
Total	628	432	-21	411

Table 5: Housing Delivery Test: 2022 measurement based on net completions between 2019 and 2022 (including Class C2 equivalent completions)

Please note: due to rounding the home required according to the HDT results in a total of 628 homes, rather than 629 homes.

* Covid-19 Adjustment for the 2020 Housing Delivery Test Measurement. To reflect the temporary disruption caused by the first national lockdown announced on 23 March 2020, the period for measuring the homes required in 2019/20 has been reduced by 1 month. As 'homes required' data can be calculated by the day, the 19/20 'homes required' measurement period has been reduced by 31 days. For more information see footnote 19.

** Covid-19 Adjustment for the 2021 Housing Delivery Test Measurement. On Monday 6th September 2021, in a written ministerial statement by the Minister for Housing set out that due to considerable variations in levels of housing delivery due to continued disruption from the Covid-19 pandemic, a four-month adjustment to the housing requirement figures for 2020-21 would be applied. This will be a deduction of 122 days to account for the most disrupted period that occurred between the months of April to the end of July²⁸. In addition, in accordance with the HDT Technical Note the housing requirement is based on a weighted average between the adopted requirement of 170dpa and the standard method figure of 328dpa due to the GBLP being classed as 'out of date' from 15 October 2020.

²⁸ Written ministerial statement 6th September 2021: https://questions-statements.parliament.uk/writtenstatements/detail/2021-09-06/hcws254

Housing Delivery Test: 2018 measurement

1.3 The HDT: 2018 measurement was published by MHCLG in February 2019²⁹. The total completions figure for the three year period was 567 and the Housing Delivery Test result 111%. The Council therefore passed the Housing Delivery Test in 2017/18.

 Table 6: Housing Delivery Test: 2018 measurement based on net completions

 between 2015 and 2018 (including Class C2 equivalent completions)

Years	GBLP Requirement	Actual Net Completions (C3)	C2 Completions (dwellings equivalent)	Total completions (net)
2015/16	170	180	0	180
2016/17	170	161	5	166
2017/18	170	219	2	221.2
Total	510	560	7	567.2

Housing Delivery Test: 2019 measurement

1.4 The HDT: 2019 measurement was published by MHCLG in February 2020³⁰. The total completions figure between 2016 and 2019 is 446, and the HDT: 2019 measurement 87%. An under-delivery of approximately 65 dwellings means the Council was required to prepare an action plan. The Council published its Housing Delivery Test Action Plan.

Table 7: Housing Delivery Test: 2019 measurement based on net completions between 2016 and 2019 (including Class C2 equivalent completions)

Years	GBLP Requirement	Actual Net Completions (C3)	C2 Completions (dwellings equivalent)	Total completions (net)
2016/17	170	161	5	166
2017/18	170	219	2	221.2
2018/19	170	55	3	58.3
Total	510	435	10	445.5

Housing Delivery Test: 2020 measurement

1.5 The HDT: 2020 measurement was published by MHCLG in January 2021³¹. The total completions figure between 2017 and 2020 is 415, and the HDT: 2020 measurement 84%. An under-delivery of approximately 81 dwellings means the Council was

²⁹ HDT: 2018 measurement available from: www.gov.uk/government/publications/housing-delivery-test-2018measurement

³⁰ HDT: 2019 measurement available from: www.gov.uk/government/publications/housing-delivery-test-2019measurement

³¹ HDT: 2020 measurement available from: www.gov.uk/government/publications/housing-delivery-test-2020measurement

required to prepare an action plan and apply an additional 20% buffer on its five year land supply. The Council published its Housing Delivery Test Action Plan.

Table 8: Housing Delivery Test: 2020 measurement based on net completions between 2017 and 2020 (including Class C2 equivalent completions)

Years	GBLP Requirement	Actual Net Completions (C3)	C2 Completions (dwellings equivalent)	Total completions (net)
2017/18	170	219	2	221.2
2018/19	170	55	3	58.3
2019/20	156*	135	0	135
Total	496	409	5	414.5

* Covid-19 Adjustment for the 2020 Housing Delivery Test Measurement. To reflect the temporary disruption caused by the first national lockdown announced on 23 March 2020, the period for measuring the homes required in 2019/20 has been reduced by 1 month. As 'homes required' data can be calculated by the day, the 19/20 'homes required' measurement period has been reduced by 31 days. For more information see footnote 19.

Housing Delivery Test: 2021 measurement

1.6 The HDT: 2021 measurement was published by DLUHC in January 2022³². The total completions figure between 2018 and 2021 is 471, and the HDT: 2021 measurement 100%. The result means the Council faces no HDT consequence.

Table 9: Housing Delivery Test: 2021 measurement based on net completions between 2018 and 2021 (including Class C2 equivalent completions)

Years	GBLP Requirement	Actual Net Completions (C3)	C2 Completions (dwellings equivalent)	Total completions (net)
2018/19	170	55	3	58
2019/20	156*	135	0	135
2020/21	145**	278	0	278
Total	471	468	3	471

* Covid-19 Adjustment for the 2020 Housing Delivery Test Measurement. To reflect the temporary disruption caused by the first national lockdown announced on 23 March 2020, the period for measuring the homes required in 2019/20 has been reduced by 1 month. As 'homes required' data can be calculated by the day, the 19/20 'homes required' measurement period has been reduced by 31 days. For more information see footnote 19.

** Covid-19 Adjustment for the 2021 Housing Delivery Test Measurement. On Monday 6th September 2021, in a written ministerial statement by the Minister for Housing set out that due to considerable variations in levels of housing delivery due to continued disruption from the Covid-19 pandemic, a four-month adjustment to the housing requirement figures for 2020-21 would be applied. This will be a deduction of 122 days to account for the most disrupted period that occurred between the months of April to the end of July³³.

³² HDT: 2021 measurement available from: www.gov.uk/government/publications/housing-delivery-test-2021measurement

³³ Written ministerial statement 6th September 2021: https://questions-statements.parliament.uk/writtenstatements/detail/2021-09-06/hcws254

In addition, in accordance with the HDT Technical Note the housing requirement is based on a weighted average between the adopted requirement of 170dpa and the standard method figure of 328dpa due to the GBLP being classed as 'out of date' from 15 October 2020.



Gosport Borough Council is committed to equal opportunities for all.

If you need this information in an alternative format or language, please let us know.

March 2025

Housing Delivery Test Action Plan

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