

SENT BY EMAIL
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07/01/2026

Dear Sir/ Madam

PORTSMOUTH LOCAL PLAN

1. Thank you for consulting with the Home Builders Federation (HBF) on the addendum to the Pre-submission Portsmouth Local Plan.
2. HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which include multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new 'for sale' market housing built in England and Wales as well as a large proportion of newly built affordable housing.

Strategic Policy PLP16: Housing Target.

The policy is inconsistent with national policy

3. The local plan consultation on in 2024 stated that the council's capacity-based housing requirement was 680 dwellings per annum (dpa) which would result in 13,603 homes being built over the plan period 2020-2040. This was circa 3,500 homes short of the level of need arrived at using the standard method of 897 dpa and a housing need across the plan period of 17,940 homes.
4. The addendum has updated this figure, increasing the housing requirement to 758 dwellings per annum with a further 800 homes being delivered elsewhere to address some of Portsmouth unmet housing needs. Over the plan period 2025 to 2040 this will see 11,369 homes delivered in Portsmouth. On the basis that the housing needs for the area using the standard method is 1,019 dpa this leaves a shortfall of 3,116 dwellings to be met elsewhere once Fareham's contribution has been taken into account.
5. The Council are proposing to use a stepped requirement with 588 homes being delivered each year between 2025 and 2030 and 843 homes being delivered to the end of the period in 2040. HBF considers that in most local plans a stepped trajectory is not required as these are usually put in place as a result of a chosen spatial strategy not due to other compelling factors such as the need for new infrastructure or a lack of available land in the early years of plan that faces a much higher housing requirement. In the case of Portsmouth, it would seem that a step is justified on the basis that there are insufficient sites available and that without a step the council will not have a five year land supply. However, in setting the step the Council will need to ensure that it has left no stone unturned with regard to development in the early years of the plan and in particular it has looked to allocate smaller sites that could deliver in the first five years of plan wherever possible.

6. The Council have also chosen to amend the plan period with the start date now given as 2025. This is consistent with the approach taken to assessing housing needs in the NPPF. However, the plan is The plan period is expected to run to 2040. If the plan is submitted in Spring 2026, it is not likely to be adopted before April 2027 at the earliest. Therefore, the plan period will on adoption be less than the 15 years minimum required by paragraph 22 of the NPPF. This is unsound and will need to be extended by two years to 2041/42 prior to submission to ensure consistency with the national policy.
7. HBF recognises that Portsmouth City is constrained with a tight boundary to its urban edge making it difficult to identify new development opportunities to meet its housing needs in full. The Council state that they have left no stone unturned in seeking to find development opportunities. However, given the shortfall in housing needs the council will need to be able to fully justify the exclusion of any sites submitted for development and that other opportunities that may present themselves following this consultation or prior to submission are included in the local plan.
8. HBF is pleased to see that 800 homes will be provided in Fareham to address some of Portsmouth's unmet needs, but it is disappointing to see that the entirety of the unmet needs has not been addressed in neighbouring areas. While it would appear from the evidence presented Portsmouth to have actively engaged with its neighbours on the issue of unmet housing needs as part of the Partnership for South Hampshire (PfSH), it is troubling that this work has not led to further homes being identified to ensure the city's housing needs will be met in full.
9. In a recent ministerial statement, the Government outlined their intention to enact the clause in the Levelling Up and Regeneration Act that will remove the Duty to Co-operate. While this will remove the legal duty to co-operate it does not remove the need for local authorities to co-operate as part of the preparation of the local plan as established in paragraphs 24 to 28 of the NPPF, and that a failure to co-operate on strategic cross boundary matters will lead to the plan being found unsound. The main difference will be that inspector will now be able to recommend modifications to address any soundness issues resulting from any failure in co-operation.
10. This means that once the relevant regulations come into force PCC are no longer under the legal duty to co-operate with their neighbours with regard to unmet development needs. However, they must still work with their neighbours on such matters if the plan is to be found sound, having specific regard to paragraph 62 of the NPPF and the requirement to take account of "*... any needs that cannot be met within neighbouring areas ...in establishing the amount of homes to be planned for*". Therefore, in preparing this local plan consideration must still be given as to the degree with which Portsmouth cannot meet their own housing needs and whether that shortfall will be addressed. As such HBF welcome the inclusion within paragraph A199 of the local plan addendum that the Council has a shortfall of 3,116 homes that must be delivered elsewhere. However, over an extended plan period this is likely to increase.

Housing trajectory

11. HBF are pleased to see that the Council are proposing to include a full housing trajectory within the local plan. This is consistent with paragraph 78 of the NPPF and provides the necessary transparency as to when sites will come forward and the rate at which they will deliver new homes.

Conclusion

12. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in the NPPF. I can therefore confirm that the HBF would like to participate in any hearing sessions held at the examination in public on the matters raised in our representations and that we would like to be kept informed of the submission and examination of the local plan.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

Mark Behrendt

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