

Sent by email to: planningpolicy@portsmouthcc.gov.uk

25/03/2019

Dear Sir/ Madam

Response by the House Builders Federation to the Portsmouth City Local Plan consultation

Thank you for consulting the Home Builders Federation (HBF) on the latest consultation on the Portsmouth City Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

It is important that local planning authorities maintain up to date local plans and it will be important for Portsmouth City Council to progress quickly to submission and adoption of a new local plan that meets housing needs in full. We would welcome the opportunity to discuss the Council's progress with the plan and the approach taken with regard to improving the supply of land for housing development. Outlined below are some general comments with regard to the preparation of the plan and the key aspects we consider are necessary to ensure it can be found sound.

Housing needs

The consultation document outlines that housing needs in Portsmouth to be 863 dwellings per annum with a whole plan requirement for the period 2016 to 2036 to be 17,260. We would agree with this assessment of needs, but it will also be necessary for the Council to take into account the most up to date affordability indicators which are due to be published in March 2019. This may also require the Council to consider their plan period. The Government's standard method uses the affordability uplift as a mechanism to take account of past delivery rates and as such the Council should consider using a start date of 2018/19 given that the latest data on affordability will have reflected delivery during this period.

Housing and Economic Land Availability Assessment

The HBF does not comment on the merits or otherwise of individual sites therefore our representations are submitted without prejudice to any comments made by other parties on the deliverability of specific sites included in the overall housing land supply, the five-

year housing land supply and housing trajectories. However, we want to stress the importance of having realistic delivery expectations within any allocations to ensure the deliverability of the plan across its lifetime. This is particularly important where there is a reliance on strategic sites to deliver the majority of new homes within the plan period and where there is an expectation that strategic sites will deliver as part of the five-year housing land supply.

The consultation document and HELAA note that there may be potential higher density development to be achieved in certain locations. In some areas significantly higher densities may be sustainable but it must also be recognised that were this development involves multi-storey flatted schemes it will require the necessary property values for it to be considered a viable development opportunity. Such development is more expensive to develop due to need for use of more extensive foundations, under-croft parking, increased need for steel, provision of lifts, services charges etc. So, whilst the Council may identify where it is considered desirable to have higher density development the level of density that can be achieved in such locations may be tempered by what can actually be viably developed.

Meeting housing needs

What is evident from the HELAA is that housing needs will not be met with out the Council seeking support from neighbouring areas. A shortfall of almost 2,800 homes is significant and cannot be ignored by either Portsmouth City Council or its neighbours. However, we are concerned that whilst the Council has worked with its partners authorities in preparing the PUSH Spatial Planning Position Statement there has been a collective inability to from the start ensure that the unmet needs of Portsmouth are met. It is essential that the Council engages with its neighbours through the duty to co-operate to ensure those needs that not met in Portsmouth are delivered elsewhere.

Paragraphs 24 to 27 of the National Planning Policy Framework (NPPF) provide the outline as to the level of co-operation required between neighbouring authorities on such strategic matters. In particular paragraph 27 states that in order to demonstrate effective and on-going joint working strategic policy making authorities should:

“...prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance and be made publicly available throughout the plan-making process to provide transparency.”

Given that it is a requirement of national policy to prepare, publish and maintain Statement of Common Ground (SoCG) these should be part of the Council's evidence with regard to the duty to co-operate. Whilst the Council has agreed a Spatial Position Statement with other authorities in Solent sub region under the auspices of the Partnership for Urban South Hampshire this cannot be considered sufficient to show on going co-operation and cannot be considered substitute for a SoCG. This was adopted in 2016 and there do not appear to be any further updates as to the progress with meeting housing needs, the impact of the updated NPPF on this position statement and whether

development needs will be met in full. A SoCG between relevant authorities could explore all these issues and ensure that the Council's activities with regard to the duty to co-operate can be properly scrutinised at examination.

For example, an SoCG with the authorities in the Solent sub area should consider how the likely shortfall arising from Portsmouth's emerging local plan will be addressed. Given that paragraph 60 of the NPPF requires that: *"In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for"* it is essential that the Council sets out where any unmet needs are being met within the Solent sub region. Where neighbouring authorities are unwilling to engage on this issue the Council must look to challenge this through the examination of local plans and not just accept statements that neighbours cannot deliver anymore housing. Unless it can be identified how the unmet needs from Portsmouth will be addressed elsewhere and that the City Council have left no stone unturned in this sub region there must be doubt as to whether the co-operation required by the Localism Act 2011 can be considered to have been effective.

Other issues

As set out in paragraph 34 of the 2019 NPPF the Local Plan should set out the level and type of affordable housing provision required together with other necessary infrastructure, but such policies should not undermine the deliverability of the Local Plan. However, alongside paragraph 34 it is important that the Council also consider the implications of paragraph 57. This requires Council to ensure that the cumulative burden of policy requirements should be set so that most development is deliverable without further viability assessment negotiations. To ensure this the Council will need to ensure its policies are not aspirational and set at the margins of development viability. The Council may need to consider setting lower policy requirements or varying them on the basis of location. Given this shift in nationally policy it is even more important than before to engage with the house building industry on these matters and ensure the viability assessment is reflective of the actual costs and returns that are likely to occur in Portsmouth.

We hope these comments are helpful and if you would like to discuss these issues further please contact me.

Yours faithfully



Mark Behrendt
Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 020 7960 1616