



## Portsmouth Local Plan Addendum 2025 Response Form

Portsmouth City Council is preparing a new Local Plan to guide development in the City up to 2040. This response form allows you to provide your views on the Pre-Submission Portsmouth Local Plan Addendum 2025 (the 'Local Plan Addendum') along with extracts of its Policies Map, the Sustainability Appraisal and the Habitat Regulations Assessment before the whole Local Plan, including its Addendum, is submitted for examination to the Planning Inspectorate.

The consultation is open from 18 November 2025 to 23.59 on 08 January 2026.

Here is a link to the [Portsmouth Local Plan Evidence](#), which includes the Portsmouth Local Plan Addendum and other supporting documents.

Please contact the Planning Policy team by email at [policyconsultations@portsmouthcc.gov.uk](mailto:policyconsultations@portsmouthcc.gov.uk) or phone 07990138226 if you have any queries or require this form in an alternative format.

### Privacy Notice

Portsmouth City Council is the data controller of any personal data you provide on this form. It will only be used for the purpose of preparing the Portsmouth Local Plan and will only be held for as long as necessary for this purpose. Your comments and your name will be published on the Council's website. We will make every effort to remove other personal details including telephone numbers, postal and email addresses, and signatures prior to being uploaded. All representations received at this Pre-Submission stage will be sent to the Secretary of State for consideration at the Public Examination undertaken by an independent Planning Inspector appointed by the Planning Inspectorate (PINS).

For full details of how the council collects and uses personal data, please see the full [Data Protection Privacy Notice](#)

The consultation (including the processing and storing of data) uses software supplied by Evolutive for Portsmouth City Council (as the Data Controller). For full details of how Evolutive complies with the UK GDPR, please see their website and private notice ([Evolutive Website](#)).

Your comments on the Portsmouth Local Plan Addendum will be analysed by officers at the Council who will also make use of Consult AI, which is a secure analysis platform provided by The Future Fox.

The Future Fox processes consultation data securely on behalf of the Council for the sole purpose of analysing and reporting consultation responses. AI services, such as OpenAI and Microsoft, are used to generate summaries and insights from the feedback. The data shared with these services is never used to train AI models and not stored by them.

Explicit personal data (such as your name, address, or contact details) is never shared with any third-parties, including these AI services. Some feedback may contain implicit personal data, for example, details within comments that could indirectly identify someone such as "my house backs onto the park". Where this occurs, it is minimised through redaction by the Council and processed under strict contractual and data-protection safeguards.

You can find out more about how The Future Fox protects your data here:

- [Privacy Policy](#)
- [Responsible AI Policy](#)

### How to complete this form

This form has three parts

**Part A Your Representation(s):** fill in and submit a response form that includes all representation(s) you wish to make on a specific policy of the Pre-Submission Portsmouth Local Plan Addendum 2025, specific extracts of its Policies Map, Sustainability Appraisal and/or Habitat Regulations Assessment.

This is a technical consultation that focuses solely on legal compliance, compliance with the Duty to Cooperate and soundness. For the Plan to be legally compliant it needs to meet all legal and procedural requirements. All local planning authorities, including Portsmouth City Council, are under a Duty to Cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries. The Government defines a Local Plan as sound if it is:

1. Positively prepared: providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
2. Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
3. Effective: deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
4. Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant

Please outline which document and section of the document you are responding to. For ease of interpretation please be as descriptive as possible using the policy number, paragraph numbers and/or site names you are responding to and supporting evidence documents where relevant.

Representations should only be made on matters that are included in the Local Plan Addendum 2025. Any representations that are received in this consultation that do not relate to any policies in the Local Plan Addendum 2025 will not be summarised by officers, but they will be passed on to the Inspector.

All representations that were duly made in either the 2024 or 2025 Pre-Submission consultations will be sent to the Local Plan Inspector.

Policies that are not in the Addendum remain unaltered by the Addendum and are not subject to further Pre-Submission consultation.

Please provide all the supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**Part B Personal Details:** need only be completed once by each person responding to the consultation. Please provide your name, postal address, email address and any other contact information. A name and postal address must be provided for the comments to be accepted. Anonymous or confidential representations without the required personal information cannot be accepted.

**Part C Diversity Monitoring:** is an optional section that asks questions about the characteristics of the person completing the form including sex, age, ethnicity, and disability. This section only needs to be filled in once. Answering these questions allows the Council to monitor responses from different groups and understand their views.

After this Pre-Submission consultation by the Council, further submissions may only be made if invited by the Planning Inspector, based on the matters and issues they identify for examination.

## Part A: Your Representation

*Please complete a separate copy of this form for each representation you would like to make. You can make as many representations as you like.*

1. Please select below which part of the Local Plan Addendum, extracts of its Policies Map, Sustainability Appraisal and/or Habitat Regulations Assessment your representation(s) relates to: \*

Local Plan Addendum Policy

Local Plan Addendum Policy: \*

Policy PLP16: Housing Target

2. Do you consider this part of the Local Plan Addendum, extracts of its Policies Map, Sustainability Appraisal or Habitat Regulations Assessment is:

2(a) Legally Compliant: \*

- Yes
- No

2(b) Sound: \*

- Yes
- No

2(c) Complies with the Duty to Co-operate: \*

- Yes
- No

3. If you have answered 'yes' to any of questions 2(a) to (c) please give details of why you support the legal compliance or soundness of the Local Plan Addendum or its compliance with the Duty to Co-operate. Please be as precise as possible: \*

Thank you for consulting East Hampshire District Council (EHDC) on a Draft Pre-Submission Portsmouth Local Plan Addendum (Regulation 19) following an original consultation in summer 2024

We understand that Portsmouth City Council (PCC) is carrying out further Regulation 19 engagement following the IROPI (Imperative Reasons of Overriding Public Interest) Opinions given by the Secretary of State for Housing Communities and Local Government in February 2025 (withdrawn because the Secretary of State agreed it was unlawful) and July 2025 (also withdrawn because the Secretary of State agreed it was unlawful) on the strategic site of Tipner West.

We understand the Local Plan Addendum should be read alongside the 2024 Pre-Submission Local Plan and as a result, these comments are based on consideration of both documents.

It is acknowledged that no formal response was sent from EHDC to the previous Regulation 19 consultation, but a Statement of Common Ground (SoCG) was agreed between both authorities in July 2024. The SoCG refers to previous collaborative work by the Partnership for South Hampshire (PfSH), which both authorities were a member of. However, EHDC formally withdrew its membership in March 2025. The SoCG acknowledged the constrained nature of the sub-region, the overall shortfall of housing to meet needs, as well as work that collectively looked at broad areas of search to potentially accommodate some needs.

At the time, PCC had an identified unmet need of 3,577 homes, equivalent to 219 homes per annum. PCC wrote to EHDC in January 2024 requesting assistance to meet these needs. It was agreed that EHDC cannot fully meet the unmet housing needs of Portsmouth City. It was recognised that whilst East Hampshire has housing market relationships with Portsmouth and Havant to the south, this is confined to the southern parishes of Horndean, Clanfield and Rowlands Castle. Further land to the north falls within the South Downs National Park (SDNP), a separate planning authority, which would be restricted to the principles associated with a National Park designation. It was further agreed that EHDC will consider the identified unmet needs of Portsmouth City (and Others) as it continues preparation of its Local Plan.

More recently (October 2025), correspondence collectively from PCC, Havant Borough Council (HBC), and Gosport Borough Council (GBC) requested assistance from EHDC with unmet housing and employment needs. A significant unmet need of 18,347 homes and 19,973 sqm employment floorspace had been identified across the three local authority areas.

It is clear from the Local Plan Addendum, particularly 'Policy PLP16: Housing Target' that over the envisaged plan-period (2025-2040) that only 11,329 homes will be provided for, equivalent to 758 homes per annum. Despite 800 homes being contributed through previous Duty-to-Cooperate agreements, this still falls short of the 15,285 homes (1,019 homes per annum) required by the standard method. There are immediate concerns that the plan-period does not reflect the NPPF requirement that strategic policies cover "a minimum period of 15 years from adoption". The plan as drafted is therefore unlikely to be consistent with national policy. However, the supporting evidence acknowledges that the proposed housing requirement is 'capacity-based', which accounts for realistic delivery based on constraints, land availability and development capacity. It also factors in the need for a stepped requirement. Therefore, extending the plan-period is only likely to exacerbate the

amount of unmet need.

Having assessed the content of the Pre-Submission Portsmouth Local Plan Composite (November 2025) and its supporting evidence base, EHDC recognises the development constraints faced by Portsmouth, and the efforts made to identify and quantify unmet needs.

EHDC supports the various sources of housing supply identified in Policy PLP16, especially in regard to deliverable and developable HELAA sites, windfall allowance, and future neighbourhood plans. It is encouraged that these sources are actively monitored throughout the plan period.

It is also stated in Policy PLP16 that a further contribution to the identified unmet need (3,916 dwellings) will be sought from neighbouring authorities through the Duty to Cooperate. As stated in EHDC's formal response to the request for assistance, as part of our local plan preparation, EHDC will give due consideration to the unmet housing and employment needs of PCC, HBC and GBC. However, it remains currently unknown whether EHDC will be able to meet its own disaggregated housing needs and therefore through due assessment will need to consider to what extent we can meet unmet needs from elsewhere in our Local Plan. It must be emphasised that should a surplus of housing capacity be identified as part of a suitable development strategy, it is envisaged that unmet needs from the SDNP in East Hampshire would be prioritised.

Overall, despite concerns over the length of the plan-period and the high amount of unmet housing need identified, EHDC does not object to the proposed plan. However, we would encourage PPC to remain flexible when identifying future sources of supply and maintain pragmatic discussions with all local planning authorities under the Duty-to-Cooperate, both adjacent to Portsmouth and beyond.

***Please Note*** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

***After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.***

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)? \*

Yes  
 No

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

***Please Note*** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

## Part B: Personal Details

*If you are responding on behalf of an organisation, the postal address noted should be that of the organisation.*

Please select here if an agent has been appointed for this representation.

### Personal Details

Title:

Mr

Forename(s): \*

Adam

Surname: \*

Harvey

Job Title:

Planning Policy Manager

(where relevant)

Company Name:

East Hampshire District Council

(where relevant)

Telephone Number:

01730 234193

Email Address: \*

adam.harvey@easthants.gov.uk

## Address

Postcode Look Up:

Building Name:

Monterey House

Secondary Name:

Street:

Bedford Road

Town:

Petersfield

County:

Hampshire

Postcode: \*

GU32 3LJ

**Please Note: anonymous or confidential representations cannot be accepted.**

Do you wish to be informed:

When the Plan is submitted for independent examination?

Yes  
 No

When the examination recommendations are published?

Yes  
 No

When the Plan has been adopted?

Yes  
 No

Of other planning policy work by the City Council?

Yes  
 No

## Part C: Diversity Monitoring

*If you are responding on behalf of an organisation, you do not need to answer these questions.*

What is your sex?

What is your age group?

What is your ethnic group?

Do you consider yourself to have a disability, or a long-term illness, physical or mental health condition that reduce your ability to carry out day-to-day activities?