

**Place Development**

Assistant Director: [REDACTED]

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Your Ref:

Date: 08 October 2024

Dear Planning Policy Team

**NEW FOREST DISTRICT COUNCIL RESPONSE TO THE WINCHESTER CITY COUNCIL PROPOSED SUBMISSION LOCAL PLAN (REGULATION 19) CONSULTATION**

Thank you for inviting New Forest District Council to make representations on the Winchester City Council Proposed Submission Local Plan (Regulation 19) (hereafter referred to as the 'pre-submission Local Plan').

Please find below an officer response on behalf of New Forest District Council (NFDC).

**Meeting Housing Needs (draft Strategic Policy H1)**

NFDC notes that, as set out in proposed Strategic Policy H1 of the pre-submission Local Plan, Winchester City Council is proposing a housing target of 15,115 dwellings (average of around 756 dwellings per annum) for the Plan period 2020-2040, and that this includes a proposed contribution of around 1,900 dwellings towards the unmet needs of neighbouring areas in the Partnership for South Hampshire (PfSH) area. The current (as of March 2024) standard method housing need figure for Winchester is 676 dwellings per annum. However, the Government has recently consulted on proposed changes to the National Planning Policy Framework (NPPF) and on a proposed revised standard method for calculating housing need. Under the proposed revised standard method, the housing need figure for Winchester would be 1,099 dwellings per annum (21,980 dwellings over a 20-year period).

Against the proposed revised standard method housing need figure, the pre-submission Local Plan would not meet its housing need and there would be a housing shortfall of approximately 6,865 dwellings, equating to approximately 343 dwellings per annum. The proposed NPPF changes also highlight the importance of meeting housing needs and of strategic planning. Under the likely forthcoming NPPF update, housing need under the proposed revised standard method will increase significantly for the southern Hampshire and Isle of Wight region. Additionally strategic planning is proposed to have notably increased importance. Due to these factors, in particular the scale of the housing need, NFDC believes Winchester City Council should give serious consideration to including a policy that commits to undertake an early review of the Winchester Local Plan. This is to provide an appropriate mechanism within the Local Plan

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to enable consideration of how the housing need of Winchester and of the wider southern Hampshire region should be considered strategically (through PfSH and other partners) across an appropriate geography. NFDC would encourage Winchester City Council to continue to engage positively with PfSH on this strategic matter.

**Nutrient Neutrality (draft Policy NE16)**

NFDC supports the inclusion of proposed Policy NE16 which sets out to ensure that development proposals demonstrate that they secure nutrient neutrality to avoid having an adverse impact on the integrity of internationally important habitats.

Yours faithfully



  
Assistant Director – Place Development  
New Forest District Council

