

Adrian Fox
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Winchester City Council

**Planning Policy,
Planning and Economic
Development**

By email only

09 October 2024

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Dear Adrian

Re: Winchester City Council - Local Plan 2040 - Portsmouth City Council response

Thank you for consulting Portsmouth City Council (PCC) on the emerging Winchester Local Plan (2020-2040) published for Regulation 19 consultation. The City Council would like to make the following comments.

Design Principles for the South Hampshire Urban Areas

The City Council's supports a design approach focused (Policy D3) upon the integration of new development into the existing built-up areas of South Hampshire. We would welcome more detail on the exact areas to which the policy applies (plan). We would also support reference to the design of new strategic scale development on the edges of South Hampshire having regard to the existing communities which that development would adjoin, including those communities in Winchester's neighboring LPAs areas.

Landscape Character

The City Council supports the inclusion of Policy NE9 which focuses on protecting and enhancing the District's distinctive landscape character as defined by the Landscape Character Assessment (LCA) 2022. Portsdown Hill runs along the southernmost edge of Winchester District and forms a distinctive boundary with Portsmouth (as outlined in LCA19 of the LCA). PCC supports the key management strategies as outlined in the LCA, which focuses on protecting, maintaining and restoring farmland, agricultural processes, the rural character and panoramic views all while respecting the setting of Fort Southwick and Fort Nelson. The protection of these heritage assets is vital and therefore PCC further support Policy HE6 of the emerging Local Plan setting out the evidence required as part of an application that has the potential to impact a scheduled monument. We look forward to working with WCC on the protection of Portsdown Hill and its important character and features.

Nitrates working together

The City Council supports the inclusion of Policy NE 16 addressing Nutrient Neutrality Water Quality Effects on the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites of the Solent.

The City Council will continue to work with WCC and other partners through the PfSH Strategic Environmental Planning Team to deliver a sustainable supply of mitigation and offsetting to address Nutrient Neutrality.

Housing need

The Standard Methodology has been used by Winchester City Council (WCC) to calculate a housing need of 13,565 additional dwellings within the District for the 2020 to 2040 Plan period. Further to this, Winchester has established a buffer of 1,900 homes to cater for unmet need in neighbouring authorities in South Hampshire. This additional buffer increases the total housing provision to 15,465.

Winchester shares a common boundary with Portsmouth and the last *Strategic Housing Market Assessment* prepared by PfSH noted that some of the District's southern wards are in the Portsmouth Strategic Housing Market Area. The Portsmouth HEDNA (para 1.14 / 1.21) (Iceni 2023) agrees with the finding of an earlier 2014 study by GL Hearn which identified a Portsmouth HMA which included all of Portsmouth, Gosport and Havant as well as the eastern wards of Fareham Borough, the southern wards of Winchester District and parts of East Hampshire District. Both the City and District Councils have worked closely together as part of PfSH. Portsmouth intends to submit a Local Plan with a capacity-based housing target of 680 dwellings per annum totaling 13,603 dwellings over the 20 year plan period. This is a shortfall of approximately 4,377 dwellings over the plan period compared to the Council's Standard Method number of 899 per annum.

The City Council has previously requested that its neighbours accommodate a portion of its unmet need. This included Fareham Borough Council, which agreed to accommodate 800 dwellings of unmet need from the city in its emerging Local Plan. These 800 dwellings help to reduce the 4,377 dwelling shortfall identified.

The City Council would therefore like to reiterate the request made in the response to Winchester's Regulation 18 plan in December 2022, in its letter dated 11 January 2024 to Winchester City Council and referenced in the Statement of Common Ground between the two authorities (August 2024) that Winchester City Council earmarks a meaningful portion of its housing buffer towards meeting unmet need of the City of Portsmouth.

The City Council has been holding bilateral DtC discussions with Havant Borough Council who are in the same position as Portsmouth City Council in requesting help from Winchester District in respect of unmet housing need.

The two authorities (PCC / HBC) suggest an apportionment of the 1,900-dwelling buffer (on the understanding that no other LPA has asked WCC to meeting their unmet needs, and accepting that the figures that make up the buffer are likely to change as the WCC Local Plan progresses) as follows:

- To Portsmouth City Council: 30% apportionment of the residual unmet need housing allowance in the Winchester District Local Plan. This would represent 570 homes in the plan as submitted.
- To Havant Borough Council: 70% apportionment of the residual unmet need housing allowance in the Winchester District Local Plan. This would represent 1,330 homes in the plan as submitted.

This suggested apportionment reflects that Portsmouth City, Havant Borough, Fareham Borough and the southeastern parishes of Winchester District fall within the same housing market area. The apportionment also reflects that PCC have been already allocated 800 dwellings towards unmet need by Fareham Borough Council in their adopted Local Plan. PCC considers that specific proportions and numbers provide additional certainty on the distribution of housing for the LPAs. The proposed apportionment will be subject to change in the event that an additional ask is made of Winchester regarding any unmet need or the housing target and/or unmet need allowance in the Winchester District Local Plan changes in the course of its examination.

It is proposed that the above is included in an addendum to the Statement of Common Ground between the two authorities to be agreed, signed and published in our respective Core Document Libraries.

Environment

PCC supports the position set out in Policy NE5 of the emerging Winchester Local Plan, which outlines the efforts to maintain, protect and enhance biodiversity within the District, working in partnership with neighboring authorities. PCC is keen to work with WCC and other partners including the Natural England on delivering an appropriate response to protecting and enhancing biodiversity in partnership with the other Districts, and Boroughs and the County Council in Hampshire through the Local Nature Recovery Strategy.

Yours sincerely



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