

Thank you for consulting Winchester City Council on the New Forest District Regulation 18 Local Plan. We recognise the work that has gone into preparing this document and the challenging timescales for the preparation of the Local Plan and commend the team for reaching this milestone in the Local Plan preparation process. Our comments below are the council's response to the consultation document with a focus on strategic housing matters rather than detailed policies.

The Housing Requirement and Unmet Housing Need

We note that your housing requirement using the standard methodology could equate to 1,254 dwellings per annum and over the plan period of 2025-2043 would generate a housing requirement of 22,572 new dwellings within the District. Based on the data in Table 4 of the consultation document, we note that the New Forest District Council's (NFDC) initial estimate of the total potential supply for all sources over the plan period equates to 13,582 dwellings. When compared against the housing requirement based on the standard methodology, this results in a substantial estimated shortfall of 8,910 dwellings over the plan period.

It is noted NFDC is currently undertaking further work to assess the development potential of several housing and mixed use sites, however, in the event that any of them are deemed unsuitable for residential uses, the unmet need figure is likely to increase. In relation to meeting the unmet need, we strongly encourage NFDC to explore every avenue to ensure compliance with paragraph 61 of the NPPF. If NFDC were to approach Winchester City Council (WCC) and any other Local Planning Authority to meet any unmet housing need NFDC would need to prepare a detailed and robust report demonstrating in detail that 'no stone has been left unturned' in trying to meet NFDC housing need. WCC assume that NFDC have already had discussions with the New Forest National Park Authority in relation to the amount of housing they could accommodate. In the absence of a robust report with evidence, WCC would not be in a position to consider whether it was able to accommodate any unmet need. If it was successfully demonstrated that there was an unmet housing need, WCC would strongly encourage NFDC to approach not only your immediate neighbouring Local Planning Authorities in your Housing Market Area but also approach other Local Planning Authorities. It is not the sole role of WCC to meet any unmet in NFDC area and this is a matter that should be planned for across a wider geography.

We also strongly encourage NFDC to explore and promote the potential for delivering higher density residential and mixed-use developments particularly in areas with high levels of accessibility, reflecting the proposed changes to the NPPF. This work could identify areas within your District where higher density development would be appropriate and ensure development sites maximise their potential for contributing towards meeting NFDC housing requirement.

Supporting Economic Growth

It is noted that NFDC intend to deliver around 142,600sqm of employment floorspace during the plan period to meet its identified need. It is understood this will be achieved through a mixture of rolling forward existing employment allocations in the adopted Local Plan and allocating additional employment sites in the emerging Local Plan. This approach seems at odds with NFDC's approach to meeting its housing needs and WCC is concerned it would result in a mismatch between housing and job creation.

Particularly if workers are living outside of the District, due to a lack of housing stock, but commuting into the District to access employment. This does not appear to be a sustainable pattern of growth with a reliance on in-commuting and we encourage NFDC to revisit its policy approach by seeking to meet a greater proportion of its housing requirement within the District to support sustainable patterns of economic growth. Linked to this in order to be able to demonstrate to a Local Plan Inspector that NFDC have left 'no stone unturned' in terms of meeting your need we recommend that as part of this work you should explore the feasibility of either mixed use sites and whether any of the employment sites could be used for residential development (appreciating that this would have an impact on the amount of employment land).

Gypsy and Traveller Accommodation

It is noted that NFDC has prepared a Gypsy and Traveller Accommodation Assessment (GTAA) which identifies a need for an additional 29 gypsy and traveller pitches and 4 plots for travelling showpeople during the plan period. Currently, the draft Local Plan does not make provision for meeting this need. It is recommended that NFDC explores every opportunity to accommodate the identified need for gypsy and traveller pitches and travelling showpeople plots. The preparation of a Pitch Delivery Assessment could assist in terms of ascertaining the proportion of need that could be accommodated through the reconfiguration of existing sites. Further work relating to engaging with the gypsy and traveller community within the District could identify if the gypsy and traveller community already have land holdings locally that have the potential to contribute towards meeting the identified need.