

## Appendix 1

### Comments of Winchester City Council

#### Consultation on ""Planning for Mixed Communities"

- The City Council welcomes the opportunity to comment on the further proposed changes to replacement paragraphs 9 - 17 of PPG 3 on Housing.
- There is, however, concern about the substantial delay in the confirming the changes to these paragraphs, and the piecemeal approach to changes being undertaken. These paragraphs provide essential guidance on housing policy, and therefore the issue of a further consultation paper with only limited additional changes, none of which reflect the Council's previous comments, is regrettable. The ODPM is urged to confirm the content of these paragraphs as soon as possible, but incorporating the changes requested.
- The Council's main concern is that no changes have been incorporated in the proposed revised text on site size thresholds for affordable housing. Whereas the Council has welcomed the ability to set lower thresholds, for sites on which affordable housing may be sought, it strongly objects to the retention of a totally arbitrary and unjustified "normal" minimum threshold, which is still retained in the revised replacement paragraphs.

As set out in the previous comments made by the Council, many authorities such as Winchester are already using the threshold of 15 units/0.5 hectares, as Circular 6/98 already allows this where exceptional local constraints can be demonstrated. The application of a "normal" minimum threshold of 15 units/0.5 hectares therefore would not bring forward any additional affordable homes in this District, and this is promoted as the primary aim of the proposed changes to PPG 3.

The exceptional constraints in this District are the reliance on a large number of very small sites coming forward for housing development. The existence of a minimum Government threshold in Circular 6/98 has severely hampered the City Council's ability to achieve the high level of affordable housing that is needed in the District.

To retain the same "normal" minimum threshold in the proposed change to PPG 3 would continue the prevalence of 14 unit schemes or below, in our case often on our scarce larger sites, where developers seek to avoid the provision of affordable housing.

In the Council's view, if every authority carries out regular assessments, and the practice guidance to accompany the changes to the PPG gives satisfactory guidance on setting targets, thresholds and proportions, there should be no need for a Government determined minimum "normal" threshold.

This Council strongly believes that targets, thresholds and proportions should always be set locally to reflect local circumstances, and locally determined provision would be a much fairer approach, reducing the burden on “abnormal” local authorities in justifying a different approach. With the guidance as proposed, there will still be a need for justification of the approach through the Local Development Framework process.

- The inclusion of further definitions in Appendix C would be supported, although, in the Council's view, the definition of key workers, restricting them to those categories eligible for the Housing Corporation funded key worker programme, should be amended to allow for a wider definition to be used where it is required by local circumstances. The Council has recently adopted a Key Worker Strategy in which it is demonstrated that a wider definition of key workers would be required in this District.

### **Questions on which the Council's views were sought (as set out in Annex C of the Consultation Paper):**

#### *Building the evidence base*

The ODPM proposes a whole stock approach to assessing the housing demands of the whole housing market. These assessments are called local housing assessments. The ODPM envisages that these assessments should be fit for purpose, readily manageable by local planning authorities and be easily kept up-to-date.

1. Do you agree that local housing assessments will improve the robustness of plan making and decisions on individual applications?

**Yes, with reservations.** Please say what they are:

**The broader nature of local housing assessments proposed in the Consultation Paper would be supported if they can be achieved and regularly updated using a simple process, that can be readily applied by local authorities. This will be dependent on the nature of the practice guidance that has yet to be published.**

#### *Partnership approach*

In line with the Planning and Compulsory Purchase Act (2004), which envisages a partnership approach to the preparation of the evidence base and plan policies, the ODPM has set out what this means in terms of stakeholder roles in delivering mixed communities.

2. Do you agree that the partnership approach will improve the robustness of the evidence base and plan policies?

**Whilst the proposal that a wide range of stakeholders should be involved in housing assessments is a desirable objective, it is likely to be more time-consuming in establishing and reaching agreement the range of needs to be met. As the Government's accompanying practice guidance on this issue has not yet been issued, it is uncertain whether or not it will include guidance on methods of achieving this approach effectively. The guidance should include a framework methodology for local housing assessments,**

**setting out how local stakeholders should be involved. It would need to ensure that a consistent approach is taken by local authorities, and have regard to the need to complete or update them within a short time-scale.**

*Mix of market housing*

The ODPM proposes a new approach to ensuring that an appropriate mix of market housing is delivered to create sustainable communities. This is one based on assessing and planning for different household types, for example one person households, over the plan area, for the plan period. This is instead of the current PPG3 approach which is based on the size and type of housing. Under the new approach, applicants should demonstrate how they are responding to the broad balance of household types when proposing a particular size and type of housing.

3. Do you agree that this approach to household mix is likely to prove more robust over the plan period and will deliver mixed communities better?

**Yes, with reservations.** Please say what they are:

**The policy framework provided by paragraphs 5 - 7 of the further Proposed Change to PPG 3 would be supported, provided that the practice guidance is sufficiently clear on how local authorities are to determine the main issues, so that a consistent approach is used to meet the policy requirements. It should therefore provide further guidance on how the broad balance between different household types is to be determined, how it is to be translated into a broad balance of provision between affordable and market housing, and how the needs of specific groups are to be prioritised (such as key workers, first time buyers, students, older people and Gypsies and Travellers).**

4. Do you agree that this approach provides a better basis for ensuring that individual sites provide an appropriate mix of housing?

**Yes, with reservations.** Please say what they are:

**This District has such a high level of need for different types of affordable housing that the policy approach is likely to aim to maximise provision in the next Plan period, as well as that of the Local Plan Review. The Council has always considered that the best approach is to determine the types of affordable housing provided on a site by site basis, as it is recognised that the larger more sustainable sites are generally more suitable for a mix of different types of affordable housing.**

**The District is reliant on the development of small sites, many of which are below affordable housing thresholds, and others are only just above thresholds, and will only contribute a small number of affordable units. Smaller sites generally provide only a small number of affordable units, and therefore a full mix of housing types required is neither possible nor appropriate. There will therefore be a large number of sites in the District where it will not be possible to replicate a broad balance of household types to be provided for and therefore the achieving any "broad balance" on a site is likely to be the exception rather than the rule. With the**

**Government's continued emphasis on the development of previously developed land, this situation is likely to continue into the next Plan period.**

5. The ODPM envisages that large sites should reflect the broad balance of household mix set out in the plan - as they represent a significant contribution to achieving the plan objectives, but that smaller sites should only contribute to this mix. We do not propose a national threshold. However, we envisage that a large site should not be lower than 60 dwellings or 2 hectares. Do you consider, in your local context, that 60 dwellings / 2 hectares is:

**Too high**

If your reply is either too low or too high, please say why:

**It should be possible to achieve a mix reflecting the broad balance of household mix needed in the District on sites smaller than 60 dwellings, although, as set out in the response to Question 4 above, a reduced threshold is likely to have little impact in this District. This is because most development takes place on sites that are substantially smaller. There must therefore be some doubt as to whether the inclusion of a broad balance of different types of housing to be provided for would have any significant value in this District, or in other local authority areas where there is a heavy reliance on the development of smaller sites.**

*Mix of affordable housing*

The ODPM does not propose any changes from the existing approach to determining the appropriate mix of affordable housing.

6. Do you agree that housing size and type should remain the basis for determining the appropriate mix of affordable housing at the plan level and for individual sites.

**Yes.**

**The District has had some success in achieving a better mix of dwelling sizes and types on sites, through its housing mix policy introduced in August 2000, but, in view of the lack of larger sites coming forward for development, an appropriate mix of a wider range of different types of dwelling is likely to be most appropriately determined by site suitability and location. It should therefore continue to be determined on a site by site basis.**

*Development Control*

The ODPM envisages that local planning authorities and applicants will have a pre-application dialogue about the appropriate mix of housing for a site. This should focus on how a proposal helps create mixed communities in the locality and contributes to overall housing supply.

7. Do you agree the following matters need to be taken into account? Please tick.

There is substantial concern about this proposal, as pre-application discussions would be likely to be required in most circumstances in this District, as few sites would be able to provide the "normal" range of types of housing in their entirety. This would have substantial effects on the Authority's ability to determine planning applications within the required timescale, and is not realistic in this District.

It would be preferable for guidance on the provision of an appropriate mix of housing to be provided by sites of different sizes and locations to be established in a supplementary planning document, as part of the Local Development Framework, that has been subject to public consultation and related to the needs of different parts of the District. Developers would then be able to take all of the matters below, without the need for extensive pre-application discussions.

- Local housing assessment
- Policies on mix of housing required across the plan area for the plan period
- Mix of housing in the locality, including its tenure, type, age, condition and demand
- Current housing market trends as demonstrated by applicants

#### *Delivering culture change*

The approach to planning for mixed communities and in particular the approach to household mix, will require a change in approach on the part of all stakeholders.

8. Assuming stakeholders work within existing resources, what will help deliver this new approach effectively? Please tick.

- √ Practice guidance
- √ Training / seminars
- √ Interchanges between stakeholders

#### *Regulatory Impact assessment*

The Partial RIA (Annex B) makes a provisional assessment of the impact of the policy in terms of the costs, benefits and risks of the proposal.

Please provide any comments you have on the assessment.

**Option 2 would be supported, subject to amendments reflecting the other comments made.**