

Your Place, Your Plan

**‘Homes for All’
– Housing Needs**

**Summary of Comments and
Issues Raised**

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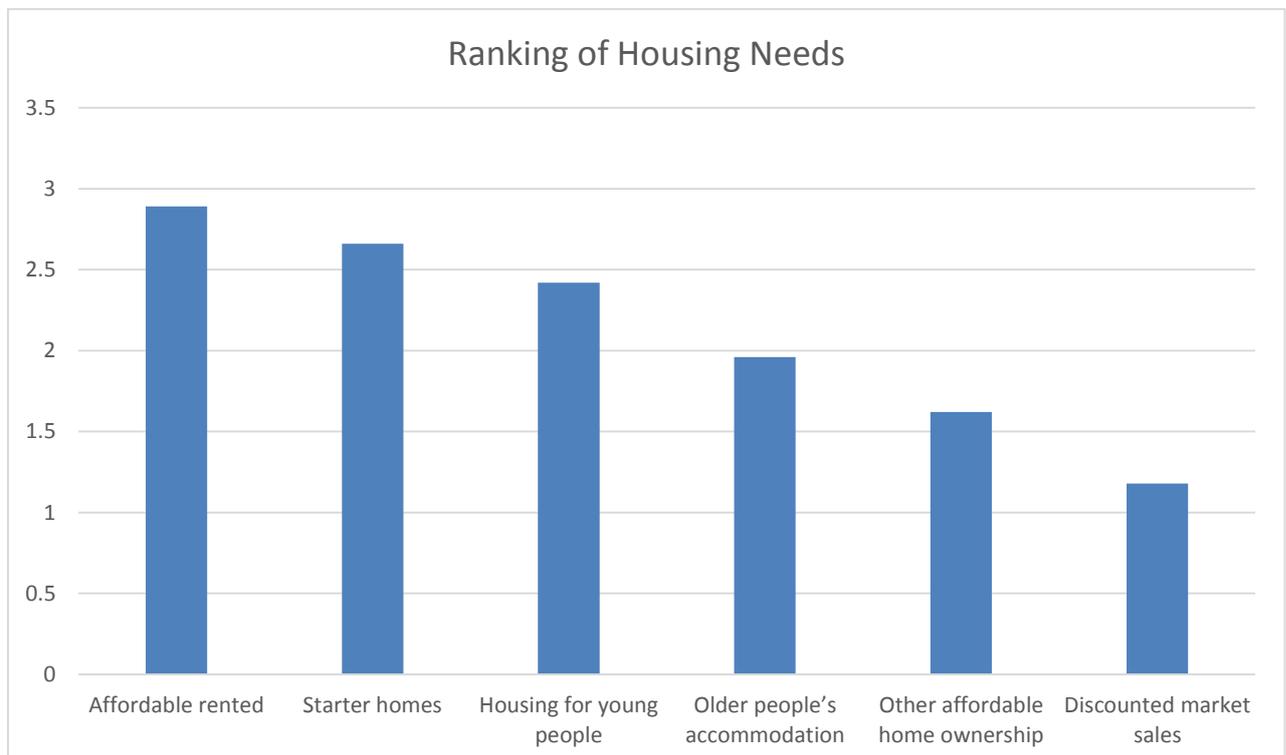
1. Housing Needs (Homes for All Question 2)

We must try to meet all housing needs but, if this is not viable, which needs are the most pressing? Please score in order (1 being the most important and 4 the least)

- *Affordable rented housing (at least 20% below market rents)*
- *Starter homes (shared ownership, equity loans, low cost homes for sale)*
- *Discounted market sales (sold at least 20% below market values)*
- *Other affordable home ownership (see Glossary for definitions)*
- *Housing for young people*
- *Older people's accommodation*

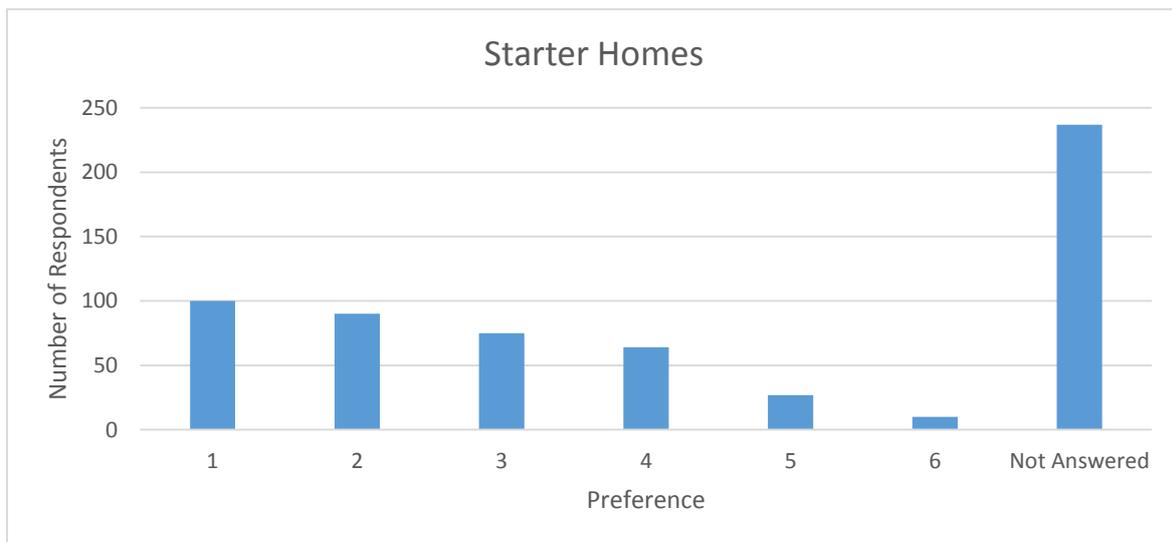
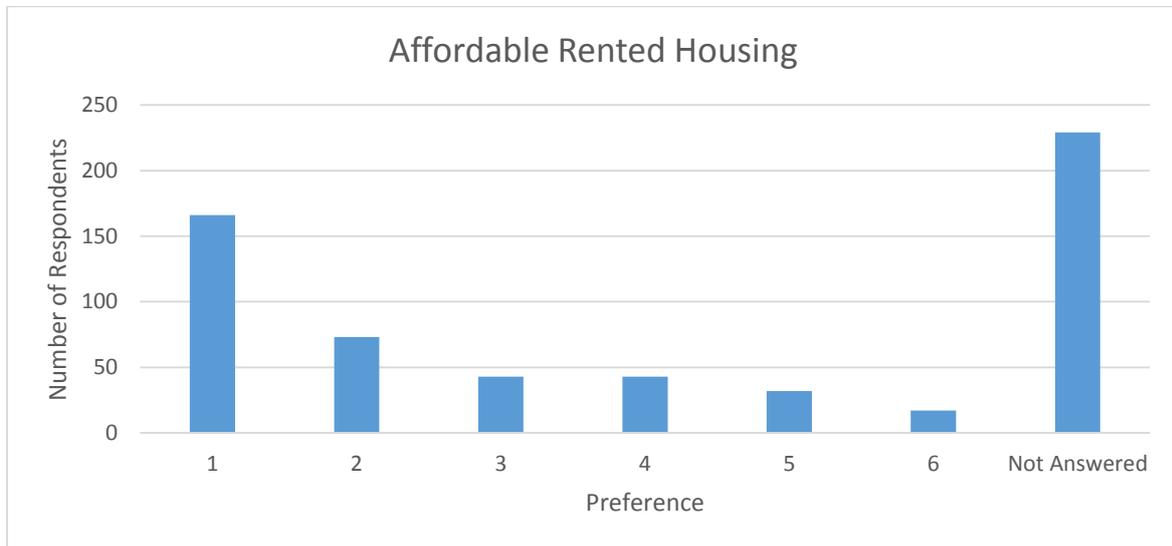
Summary of Responses

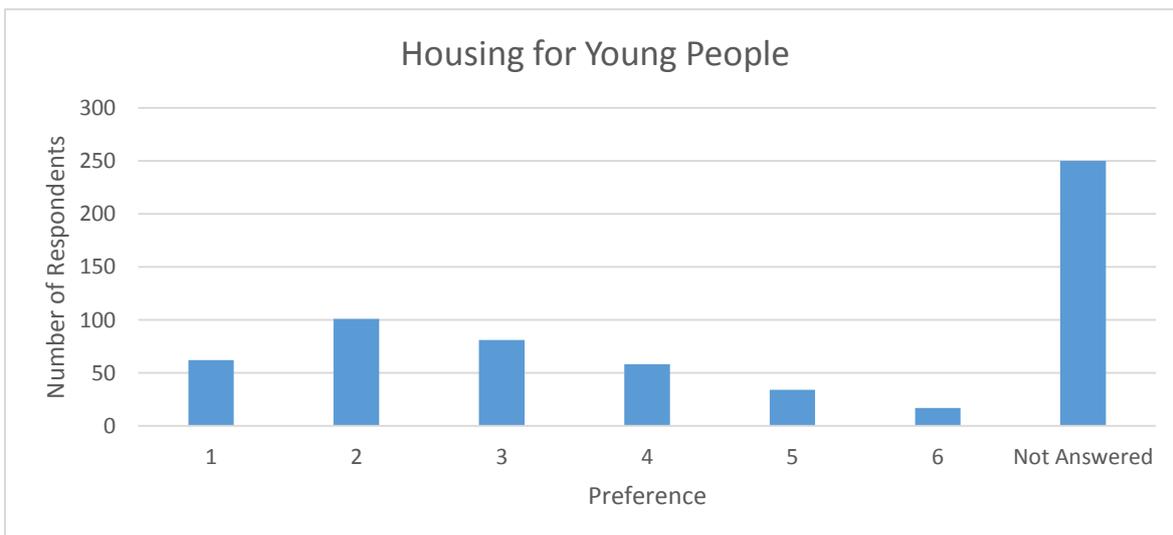
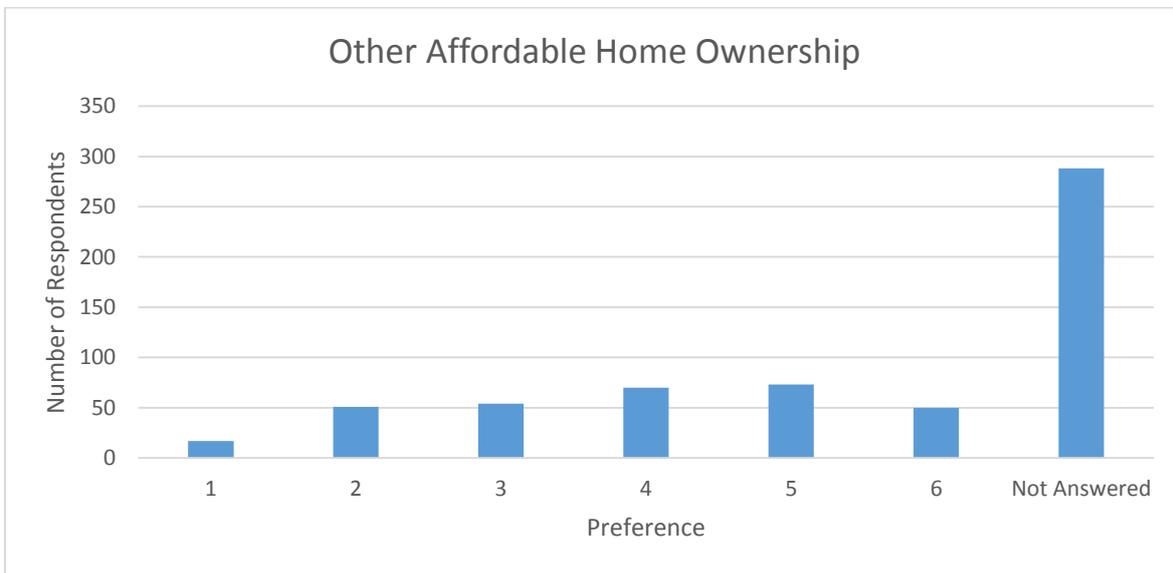
1.1 The overall response in terms of the relative preferences expressed for each type of housing need was (responses by Citizen Space):

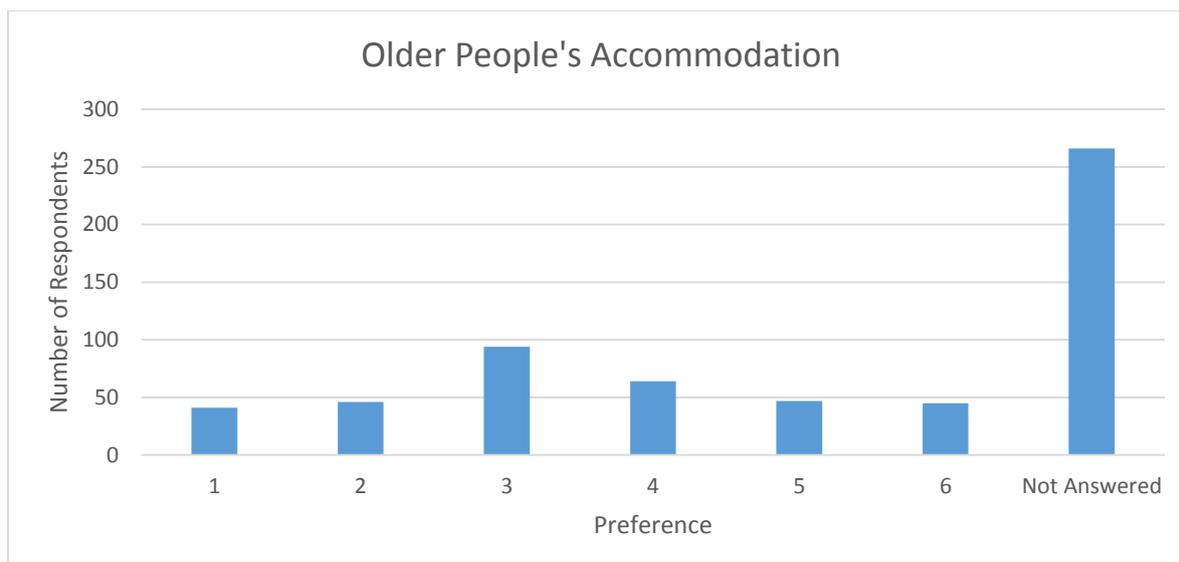


Note: The vertical axis score is calculated by weighting the options (1st choice, 2nd choice, etc), multiplying by the number of responses for each approach, and dividing by the total number of responses.

1.2 The relative strength of opinion on each type of housing need was also recorded, with people asked to score the most important (1) to the least important. The following tables show the 'choices' for each type by number of respondents (from all sources):







- 1.3 The tables above show that **Affordable Rented Housing** was seen to be the most pressing type of housing need. The detailed scoring shows the majority of people selecting this as their first preference, with very few people selecting it as their last choice.
- 1.4 **Starter Homes** were viewed as the next most pressing type of housing need, but with a lower number of people selecting it as their first preference and significant numbers as a second or third choice. Very few considered it their last choice.
- 1.5 **Housing for Young People** was identified as the third most pressing type of housing need. The detailed scoring shows that more people selected this as their 2nd or 3rd choice rather than their preference. Even so, very few people selected it as their last choice.
- 1.6 **Older Person's Accommodation** was identified as the fourth most pressing type of housing need. The detailed scoring shows that many people selected this as their 3rd choice, with fewer people selecting it as their 1st or 2nd choice than as their last choices.
- 1.7 **Other Affordable Home Ownership** was identified as the second least pressing type of housing need. The detailed scoring shows that very few people selected this as their 1st choice, with most people placing it amongst their lower preferences.
- 1.8 **Discounted Market Sales** was identified as the least pressing type of housing need. The detailed scoring shows that most people placed this within their lowest preferences, with very few identifying it as their first choice compared to a large number identifying it as their lowest preference.

Have we identified all of the possible approaches – are there any missing that we have not considered?

- 1.9 This question provided the opportunity for people to suggest alternative approaches or to explain the preferences they had given. There were many

responses to this section and the following summarises and groups the comments made about types of housing need.

Types of Housing Needed

- The Local Plan must meet all housing need as required by the NPPF, increasing housing provision if necessary, and cannot choose which aspects of housing to plan for – **3 comments** (E1121, E1123, E1124)
- Social housing should be included in the list of housing needs – **2 comments** (E1182, E1244)
- There needs to be social housing in any new development to meet local need, led by WCC not dictated by developers – **2 comments** (E1232, L50)
- Need to review the demographics of the population and the needs of the ageing population to ensure the right range of homes – **2 comments** (E1069, E1082)
- Priority should be given to affordable (preferably social) rented housing, including for older people. Other tenures are also desirable to create a diverse housing market and support the mixed and balanced communities. The housing stock (across all tenures) meets the needs of all members of the community so flexibility should be built into the new housing stock by requiring Building Regulations Part M4(2) and a proportion on larger developments should be built to Part M4(3) – **1 comment** (E1238)
- Support efforts to provide genuinely affordable housing and the analysis of affordable housing needs in the SHMA, the Council should prioritise social and affordable rented products – **1 comment** (E1060)
- In respect of housing affordability there is a need for “other forms of housing” which should include housing for those with disabilities and care needs, rural housing and community led housing – **1 comment** (E1238)
- There is a need for truly affordable rented housing rather than current models linked to market rents – **1 comment** (C580)
- Prioritise public sector housing providing affordable homes for the workers that the local economy needs, starting prices of £800K are not affordable – **1 comment** (C555)
- Low-cost housing to rent and to buy should be the priority and Parker-Morris or similar housing standards should be re-instated – **1 comment** (E718),
- The plan should make positive provision for custom build, rural exceptions and the release of smaller/medium sized sites adjacent to settlement boundaries to meet local needs – **1 comment** (E1051)
- There is a lack of high-quality affordable homes for young people and families which will encourage an aging population, less diverse economy, and increased burden on the NHS – **1 comment** (H8)
- The SHMA assumes that affordable home ownership will be through shared ownership but there is likely to be significant demand for discounted market homes for sale and starter homes – **1 comment** (E1121)

- There is a pressing need for additional homes of all types and a need to respond to emerging Government requirements relating to starter homes, etc – **1 comment** (E1128)
 - Starter homes for young people and elderly residents are important in a rural village, these properties must remain as smaller affordable property. There should be a stock of affordable rented housing available, ideally provided by WCC – **1 comment** (E1233)
 - Homes for local people should be considered, new developments are being bought by people moving out of London and are too expensive for local people – **1 comment** (C501)
 - Stop encouraging people to move to this area, look at the needs of the local population and provide small houses for first time buyers – **1 comment** (C514)
 - What is "other affordable home ownership"? – **1 comment** (C376)
- 1.10 Several respondents representing development interests make the point that the Local Plan should meet all housing need, as required by the NPPF. There are a variety of views on which types of affordable housing are most needed, although these generally reflect the overall response, as illustrated in the tables above. The Strategic Housing Market Assessment (SHMA) also provides detailed evidence in relation to housing affordability and the needs of various groups, as mentioned by some respondents.
- 1.11 A number of respondents highlight the importance of social rented housing, although this is a component of the 'affordable rented housing' category. There are also comments about the need for housing to be truly affordable and in support of other types of affordable housing, including for young people and families, elderly people and through shared ownership, and discounted market housing.
- 1.12 There is a request consider housing for local people. Although it is not possible for the Local Plan to restrict housing in this way, some types of affordable housing allow the Council to have nomination rights so that it can be allocated to those most in need. There was a query about what 'other affordable home ownership' is, but this is one of the categories of affordable housing mentioned in the NPPF definition of affordable housing (NPPF Annex 2). It is acknowledged that this title is somewhat confusing, although the SIP document does define this in its Glossary.

Affordable Housing Delivery

- If there are viability issues with meeting affordable housing need more market housing should be allocated to enable affordable housing delivery – **2 comments** (E1005, E1069)
- As an affordable housing provider we have had some challenges complying with S106 agreements with regard to shared ownership while also meeting Homes England requirements. Shared ownership and other low cost home

ownership products should be affordable, but are typically pegged against market values, some other local authorities use the shared ownership model as a starting point – **1 comment** (H136)

- Affordable housing cost needs to be based on household income not a % of market price – **1 comment** (C386)
- Support a suitable mix of housing types and sizes, policies should be flexible to ensure the most appropriate mix on a site-by-site basis. Support optimising affordable housing within new development and continuation of a 40% requirement, subject to viability – **1 comment** (E1092)
- Larger MDA-scale development has proved much more effective in delivering affordable housing than brownfield or smaller sites – **1 comment** (E1121)
- Local Policies insufficiently defined and/or enforceable to provide housing that both meets local housing needs and local character. Developers are able to build executive homes rather than what is needed for workers in the town – **1 comment** (E1253)

1.13 There are various, mostly individual, comments concerning how affordable housing is delivered or managed. Clearly, viability is a key consideration in determining what affordable housing can be delivered. A Local Plan viability assessment has been commissioned that will assess the ability of different types of site and development to deliver affordable housing and other developer contributions. The comments of affordable housing providers are useful and the SHMA also considers how affordability is measured. The various comments are noted and will be considered alongside the results of the viability work and other evidence in developing updated affordable housing policies.

Location of Affordable Housing

- The spatial strategy should promote specialist housing in each local housing market, including large sites in the more sustainable locations (e.g. for affordable extra care for older adults typically 0.5-1 ha). Larger site allocations should include a requirement to meet a range of housing needs – **1 comment** (E1238)
- Need to provide specific guidance and preference for supported housing for the elderly in housing allocations especially in or adjoining Winchester, there is much evidence of demand but it is difficult to secure sites – **1 comment** (E1217)
- Welcome the allocation of affordable housing for residents working in Alresford – **1 comment** (E1198)
- Housing need in rural communities is for young people starting out and older people wanting to downsize, neither is well catered for in Cheriton – **1 comment** (E1245)
- Denmead needs more council and privately rented housing – **1 comment** (H52)

- 1.14 There are various comments about the need for affordable housing to be provided in particular areas. These are noted and the Local Plan will need to include site allocations or more general policies as necessary, to ensure that provision is made for particular types of housing, or in various locations.

Assessment of Affordable and Other Housing Needs

- 1.15 As well as indicating people's views on the relative needs for different types of affordable and other housing, the summary above shows that there were 'free text' comments on several other issues. The majority of comments were about the different types of housing need, which were also the subject of the rankings shown in the tables above.
- 1.16 The ranking of housing needs shows that Affordable Rented Housing was seen to be the most pressing type of housing need, followed by Starter Homes and then Housing for Young People. Some of the 'free text' comments raise the need for social rented housing and express concerns about the affordability of 'affordable housing'. 'Affordable housing for rent' is defined in the National Planning Policy Framework (NPPF Annex 2) and can cover several types of rented housing. Social rented housing is the most affordable and therefore the level of subsidy needed to provide it, from developers or elsewhere, is higher.
- 1.17 The Strategic Housing Market Assessment (SHMA) contains a detailed assessment of the need for various types of housing over the Plan period. This includes affordable rented housing (including social rented), how affordability should be defined, starter homes and various other types of housing need.
- 1.18 The SHMA was completed in 2020 and looked ahead to an expected Local Plan end date of 2036. It concluded that there remains a substantial need for additional affordable housing for those who cannot afford to rent, with a total need for 220 dwellings per annum across the District. On the face of it, this amounts to 33% of the annual need, derived using the standard method (665 dwellings per annum), but this does not mean that there should be a target for 33% of new housing to be affordable rented housing. This simplistic calculation does not take account of existing housing commitments, which will include some affordable rented housing, but which also limit the amount of additional housing that any new policies would impact upon. Additionally, current Government policies prevent affordable housing being sought from sites 10 or less dwellings and the issue of development viability is also critical to affordable housing provision.
- 1.19 The SHMA also identifies a need for affordable home ownership homes, with a total need for 123 per annum across the District. This need can be met through a variety of means including low-cost home ownership products, as set out in the NPPF's Glossary. The SHMA recommended that shared ownership is the most appropriate form of affordable home ownership but also

encouraged consideration of other packages such as providing support for deposits. The NPPF requires at least 10% of new housing on larger sites to be for affordable home ownership and the SHMA provides evidence to justify this type of provision.

- 1.20 The figures in the SHMA would imply a District-wide tenure split of 64% rented (social/affordable) to 36% affordable home ownership. However, given the clear and acute need for affordable rented housing, the SHMA advises that the Council should look to seek as much affordable rented housing as viability considerations allow. This would also be subject to the NPPF requirement for at least 10% of housing on larger sites to be for affordable home ownership.
- 1.21 The next most 'needed' type of housing according to the consultation responses was starter homes. The NPPF refers to a specific definition of these, contained in the Housing and Planning Act 2016, but it is likely that most respondents would equate starter homes with housing aimed at first time buyers. Starter homes are a form of affordable home ownership and could, therefore, form a component of the need for this type of accommodation assessed by the SHMA (123 dwellings per annum) and of the 10% of units required to be for affordable home ownership by the NPPF.
- 1.22 First Homes is a relatively new concept and are a specific kind of discounted market sale housing promoted by Government which are defined as meeting the definition of 'affordable housing' for planning purposes. First Homes are aimed at first time buyers and are required to be discounted by at least 30% from the market level, with the first sale price set no higher than £250,000 (£420,000 in Greater London). This discount must be passed on at each subsequent title transfer. Local conditions can be placed on matters such as the minimum discount, income caps, or local connection/key worker requirements and these would need to be specified in the Local Plan. The Government intends that First Homes should form 25% of affordable housing provision, which may not meet the most pressing housing needs and could affect viability.
- 1.23 Housing for young people was the third most 'needed' type of housing according to the consultation responses. The SHMA also assesses the need for homes for younger households, with the demographic projections expecting younger households to increase by 2,700 households. Housing affordability is a particular issue affecting younger households, so delivery and access to affordable housing is very important in ensuring that a balanced population profile is maintained. The main approaches recommended by the SHMA to address the needs of younger households are promoting delivery of affordable housing through planning policy and promoting the potential for public sector land to contribute to affordable housing delivery.
- 1.24 The Council's 'Next Generation Winchester' project explored the challenges faced by younger people (aged 18-35) wanting to live in Winchester District. The project has explored the options for young people and provided an

opportunity to influence housing policy, future house building and local housing options across the District. In July 2021 the Next Generation Winchester focus group explored the barriers of buying a home in Winchester for participants aged 18-35, of which the majority were working full time and living at home with their parents. The cost of buying or renting was identified as the main barrier preventing young people moving into their own home (for details see the [Next Generation Winchester](#) website).

- 1.25 Older persons' housing was not very highly ranked in terms of responses to this question (4th most needed). The SHMA studied the characteristics and housing needs of the older person population and those with a disability in some detail. The two groups were considered together given the clear link between age and disability. The number of people aged over 65 is projected to increase by 12,400 (49%) between 2016-36, with 8,700 of these being aged 75+. The number of people with health problems and/or disabilities are projected to increase significantly – people with mobility problems are projected to rise by 3,100 over the 2016-36 period, with growth of 1,400 persons with dementia, and a need for 560 wheelchair-user homes.
- 1.26 The SHMA identifies a need for 998 'housing with support' units over the period to 2036, the majority of which are expected to be leasehold. This term covers sheltered housing or retirement living, but can also include properties for people with disabilities or long term health difficulties from a range of age groups. There is also a need for 620 'housing with care' units, with a need for both market and affordable provision. This can be met through provision of extra care housing, but the SHMA recommends that consideration be given to developing affordable housing policies for extra care. Additionally, a need is shown for around 800 care or nursing home bedspaces to 2036.
- 1.27 The responses suggest the lowest perceived levels of need are for 'other affordable home ownership' and 'discounted market sales'. This is consistent with the results of the SHMA which finds the greatest needs are for affordable renting housing. The SHMA also assesses other specific housing needs such as for family housing, students, co-housing, and service families (see also section 3 below on Specialised Housing). The SHMA also contains considerable evidence on the need for different sizes of housing and emerging housing market segments such as the private rented sector (PRS), self-build, rural exception sites and community-led housing.
- 1.28 Given the changes likely between the publication of the SHMA and examination of the Local Plan, as well as changes to the Plan period, it will be necessary to update the SHMA at a suitable stage. Census data is one of the key inputs to the SHMA and it is proposed that this update be undertaken so as to inform the Regulation 19 Plan, by which time the main results of the 2021 Census should be published. Viability will also be a critical issue and work has been commissioned to undertake a Local Plan viability assessment which will help determine how much affordable housing and other developer contributions can realistically be sought from different types and sizes of site.

Work will also be needed to update information on housing commitments and the supply of affordable housing that is likely to be delivered by sites that are already permitted or allocated.

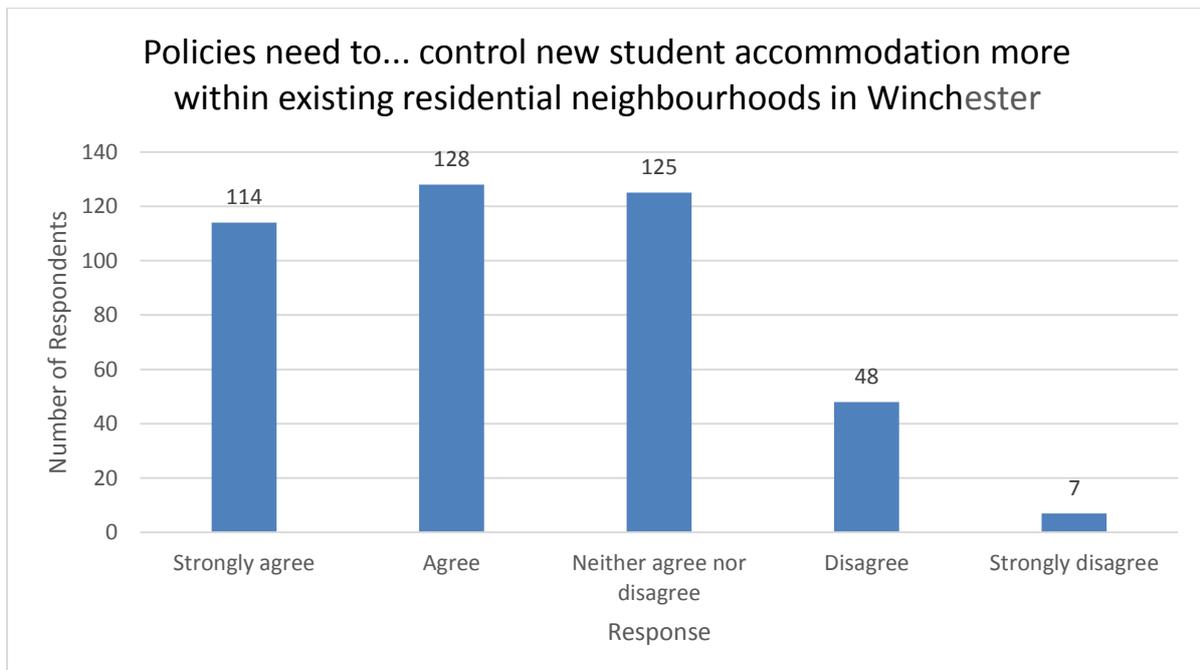
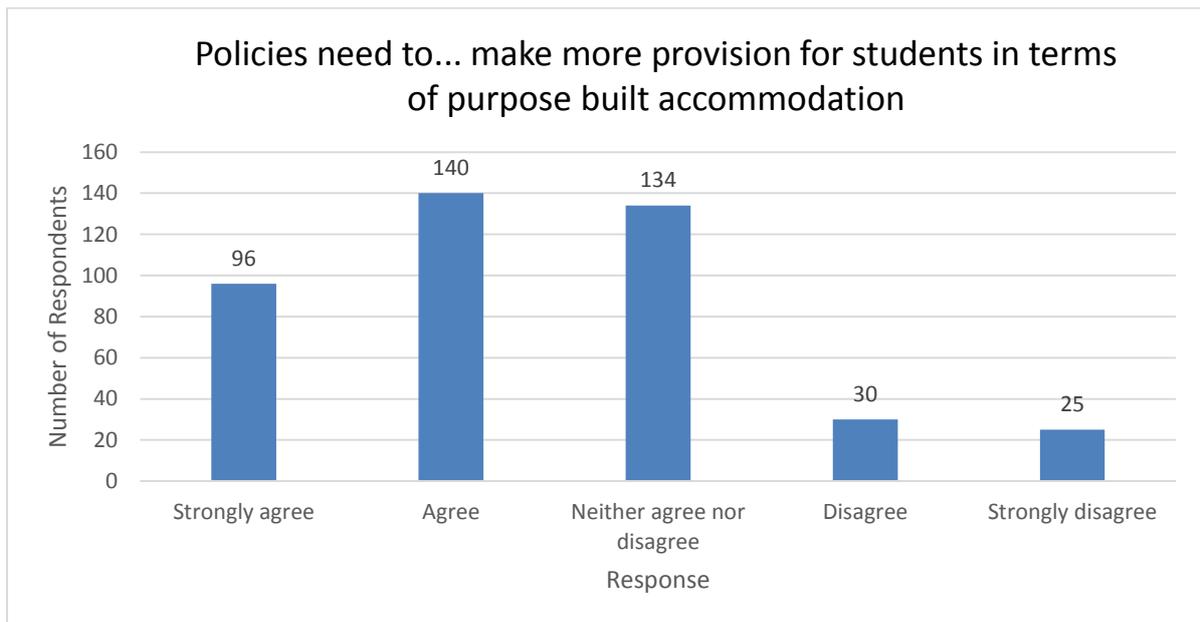
- 1.29 In view of the above, it is not possible at this stage to set a new target for affordable housing provision from housing developments. The evidence in the SHMA suggests this may vary in different parts of the District and this issue will also be considered through the viability assessment. However, the evidence does suggest that the need for affordable rented housing remains the greatest and this is consistent with the public comments which identify this as the most needed form of housing (subject to the NPPF requirement for at least 10% of units to be for affordable home ownership and for 25% of affordable housing provision to be 'First Homes').
- 1.30 It is, therefore, likely that the new Local Plan's provisions for affordable housing will need to seek the maximum amount that is viable from those sites that are above the Government's threshold for affordable housing provision, with viability considerations possibly suggesting the proportion may vary in different parts of the District or on different types of sites. It will be necessary to consider whether local requirements for First Homes are justified (e.g. higher levels of discount, local connection requirements, etc), and the impacts of this on other types of affordable housing provision, and to include Local Plan policies as appropriate. The Local Plan will also need to develop policies and/or site allocations to address other needs identified in the SHMA (updated as necessary), including for affordable home ownership, housing for the elderly and those with disabilities, care accommodation, self-build, etc.

2. Student Accommodation (Homes for All Question 3)

“Policies on student housing and houses in multiple ownership in Winchester need to...

...make more provision for students in terms of purpose built accommodation

...control new student accommodation more within existing residential neighbourhoods in Winchester?”



- 2.1 There are two main higher education establishments in Winchester, the University of Winchester and the University of Southampton (Winchester School of Art), with Sparsholt College also located in the District. The Higher Education Statistics Agency's latest (2019/20) data shows that there were a total of 8,000 students at Winchester University but does not break down the University of Southampton's figures to show how many of its 22,000 students are at Winchester, nor provide information on Sparsholt College. Almost 7,000 of the University of Winchester's 8,000 students are full time, with this figure having doubled since 2005/06. The Strategic Housing Market Assessment (SHMA) provides more details.
- 2.2 Question 3 was aimed at seeking views regarding student accommodation, which is an issue in Winchester particularly. The responses illustrated in the graphs above show that there was general agreement with both the propositions that there should be greater provision for student accommodation and greater control over it. Slightly more people 'strongly agreed' that there should be more controls over student accommodation in existing residential areas than 'strongly agreed' with providing for new accommodation. There were also a few individual comments specifically relating to student accommodation, as follows.

Student Accommodation

- Student accommodation should be in specially designated areas and purpose built, changing what used to be normal family houses to multiple occupancy should be banned – **1 comment** (E833)
 - Winchester is a University town but has little strategy for student housing pushing students to lower cost housing and HMOs and removing affordable family homes – **1 comment** (E1253)
 - Need more affordable housing for young people rather than student accommodation – **1 comment** (M16)
 - Good quality HMOs provide important homes for groups other than students such as those in need of supported housing, homelessness, move on accommodation and young people – **1 comment** (E1238)
- 2.3 The small number of individual comments concern the creation of houses of multiple occupation (HMOs) or loss of family housing, suggest there is a greater need for affordable housing for young people, or that HMOs can be important for groups other than students.

Assessment of Student Accommodation Needs and Issues

- 2.4 The responses illustrated in the graphs above show that there was general agreement with both the proposition that there should be greater provision for student accommodation and that there should be greater control over student housing. Slightly more people 'strongly agreed' that there should be more

controls over student accommodation in existing residential areas than 'strongly agreed' with providing for new accommodation.

- 2.5 With regard to the issue of controls over student accommodation, one of the main concerns has been about the loss of family housing in areas such as Stanmore to houses in multiple occupation (HMOs). This may be part of the reason for the strong support for controls over student accommodation in existing residential areas, although the number of 'free-text' comments on this was very small.

Houses in Multiple Occupation (HMOs)

- 2.6 The Council introduced a policy through Local Plan Part 2 (policy WIN9) in response to increasing concern about the effect of HMO accommodation in Winchester and its impact on the provision of family housing, particularly in Stanmore. This policy refers to the designation of 'Article 4 Directions' to limit changes of use of dwellings to houses in multiple occupation (HMOs) and sets out criteria against which planning applications for HMOs will be assessed.
- 2.7 An Article 4 Direction to remove permitted development rights for the creation of HMOs came into effect in Stanmore, Winchester in May 2016. This was followed by another Article 4 Direction at Winnall, Winchester which came into effect in May 2018. The Council has also agreed to implement a further Direction for the Chalk Ridge (Winnall) area of Winchester. Article 4 Directions remove permitted development rights which enable family homes to be converted to smaller HMOs without requiring planning permission from the Council (larger HMOs require permission anyway). They enable the Council to assess such changes of use and determine planning applications in line with Local Plan policy WIN9 and other material considerations.
- 2.8 Since October 2018 the 'Licensing of Houses in Multiple Occupation Order' requires any HMO occupied by five or more tenants forming two or more households to be licensed. There is also a minimum sleeping room size in licensable HMOs. Where existing HMOs no longer met the minimum requirements, landlords had up to 18 months to resolve the situation, where possible. The City Council agreed in July 2018 to expand the scope of the licensing requirements for all HMOs within the District in line with legislation.
- 2.9 In terms of the operation of the Article 4 Direction and Local Plan policy WIN9, Table 1 below uses information from the Council's Authority Monitoring Reports on all applications for HMOs in Winchester since 2016.

Table 1: Planning Decisions on HMO's in Winchester 2016-2021

Year	Application no. Proposal	Location	Decision	Within Art. 4?
2016/17	-	-	-	-
2017/18	17/00600/FUL c/u dwelling to HMO	50, St Mary Street, Stanmore, Winchester	Refused 13.4.17	Yes
2018/19	18/01686/FUL c/u dwelling to HMO	141, Stanmore Lane, Winchester	Refused 13.9.18	Yes
2018/19	18/01248/FUL c/u 6 bedroom to 7 person HMO	31, Wavell Way, Stanmore, Winchester	Permitted 11.7.18	Yes
2018/19	18/02853/FUL 7 bed HMO	44, Fromond Road, Weeke, Winchester	Refused 1.3.19 appeal dismissed	No
2018/19	18/01782/FUL c/u 6 bed HMO to 7 bed HMO	34, Chalk Ridge, Highcliffe, Winchester	Permitted 1.11.18	No
2019/20	19/00425/FUL c/u dwelling to 7 bed HMO	140, Stanmore Lane, Winchester	Refused 23.4.19 appeal dismissed	Yes
2019/20	19/01226/FUL c/u dwelling to HMO	52, Garbett Road, Winnall, Winchester	Refused 30.8.19	Yes
2019/20	19/00714/FUL c/u dwelling to HMO	2, Fiona Close, Winnall, Winchester	Refused 30.7.19 appeal allowed	Yes
2019/20	19/00318/FUL c/u to HMO	Little Spark, Sparkford Road, Winchester	Permitted 8.8.19	No
2019/20	19/00476/FUL c/u dwelling to HMO	39, Shepherds Road, Winnall, Winchester	Permitted 24.4.19	Yes
2020/21	19/01880/FUL c/u 6 bed HMO to 7 bed HMO	44, Fromond Road, Weeke, Winchester	Permitted 20.4.20	No
	19/01707/FUL c/u 6 bed HMO to 7 bed HMO	20, Priors Dean Road, Harestock	Permitted 19.6.20	No
	20/02635/FUL c/u HMO to residential / HMO	7, Milner Place, Winchester	Permitted 17.2.21	Yes
2021/2022	20/02790/FUL c/u residential to residential / HMO	102, Firmstone Road, Winchester	Permitted 1.4.21 appeal allowed	Yes

- 2.10 Table 1 above shows that most applications within the Stanmore and Winnall Article 4 Direction areas were refused, even though policy WIN9 does not impose a blanket ban on HMOs. The three applications that were permitted in Stanmore were for an additional bedroom in an existing HMO and for another two existing HMOs to be used for HMO or residential purposes. The application that was permitted at Winnall was found to accord with planning policies, being below the threshold for the proportion of HMOs in the area and acceptable in terms of disturbance and parking. Two other applications in Winnall were refused but then allowed on appeal. One property had previously been used as a shared house and the proposal was for student accommodation in an HMO. The Inspector found that the thresholds for the proportion of HMOs in the area would not be breached and that the proposal was acceptable in terms of disturbance and parking. In the other appeal the issue concerned the number of bedrooms in the proposed HMO and the Inspector concluded that a condition limiting the proposal to 4 bedrooms should be removed.
- 2.11 Several recent applications have been for changes of use from family housing to dual HMO/residential use, or for changes of an existing HMO to dual HMO/residential use. Some recent applications were withdrawn so are not included in the table above. These proposals suggest that landlords are looking for flexibility to let properties either as HMOs or for family housing, possibly as a result of the reduction in students on-site during the pandemic.
- 2.12 The analysis above suggests that the combination of Article 4 Directions and the existing Local Plan policy are resisting HMOs where they would lead to an over-concentration or result in harmful impacts. The appeals that were allowed were not as a result of any challenge to the Directions or policy, which allows for HMOs to be permitted where its criteria are met.
- 2.13 A similar approach of using Article 4 Directions in conjunction with a Local Plan policy containing thresholds is also applied in several other local authorities, including Oxford, Warwick, Portsmouth and York. Another approach adopted by some authorities is to apply a criteria-based policy for new HMOs, rather than having a limit on the proportion that can be permitted (e.g. Bath, Southampton). This approach tends not to limit HMOs in specific areas, but to limit HMOs to 'suitable' sites that accord with broader criteria.
- 2.14 The Council operates mandatory licencing for HMOs with 5 or more occupants, the majority of which are student shared houses. There are a relatively small number of bedsit-type HMOs. Due to Covid it has not been possible to carry out a comprehensive inspection of HMOs that fall outside of mandatory licencing. During the pandemic the Universities were required to operate 'virtual' courses during periods of lockdown, so students were not attending courses and could live away from their education provider. With the Universities only recently returning to in-person teaching there has been a reduction in demand for student accommodation, but it is not yet clear

whether there will be a lasting impact on the student housing market due to Covid. If the Universities maintain or expand student numbers, and can continue in-person teaching, it is likely that the pre-Covid situation will return.

- 2.15 Landlords appear to view student HMOs as lucrative investments, with good yields and predictable tenancy turnover. Having two University campuses in Winchester provides a strong market for student HMOs, but bedsit-type HMOs may also provide relatively affordable accommodation for single people of working age. If there is a downturn in the future need for student accommodation landlords may switch from student shared houses to bedsit HMOs.
- 2.16 As noted above, the current approach of Article 4 Directions and Local Plan policy thresholds appears to be effective and it is proposed that this should be maintained, possibly updating the thresholds if necessary. The need for additional Article 4 Directions, or changes to existing Directions, is not something that needs to be determined through the Local Plan process as the Council can review whether changes to the coverage of Article 4 Directions are needed at any time. This happened in 2019, when it was decided that there was not sufficient justification for additional Directions at Fulflood or Badger Farm, and currently with the proposal for a new Article 4 Direction covering Chalk Ridge.

Purpose Built Student Accommodation (PBSA)

- 2.17 The provision of purpose built accommodation for students was assessed in the Strategic Housing Market Assessment (SHMA) 2020. The SHMA looked at trends in student numbers year-on-year (although information was not available for all establishments) and the type of accommodation being occupied by students. The main establishments were contacted to get a picture of future growth plans, both in terms of student numbers and student accommodation.
- 2.18 The University of Winchester indicated that it expected an increase in the number of students, although principally from students in healthcare-related courses where students typically already live in the area or commute in from other areas. The University was planning an estate masterplan, which would aim to address the remaining proportion of growth within the extent of its existing footprint, through additional halls of residence for first-year students. Engagement with Winchester School of Art and Sparsholt College suggested no notable plans for expansion of student numbers at the time. The students at these establishments can access accommodation on-site or in the local area and these establishments did not consider that additional provision was required.
- 2.19 The SHMA also noted that there is regular activity from private developers of accommodation for students. The larger purpose built student accommodation tends to fall outside of the scope of mandatory licencing. Letting agents that were consulted in Winchester as part of developing the SHMA felt that there

was sufficient accommodation in the market for returning students, with 2018/19 the first year in which there had been a surplus.

- 2.20 The SHMA acknowledged that further purpose-built accommodation would come forward in Winchester, which it felt would help alleviate pressures on the wider housing market for student accommodation. The SHMA identified various student housing schemes in the 'pipeline' and since the SHMA was published Pine Cottage ('Sparkford Place'), Sparkford Road has been largely completed (88 student bedrooms), a development of 134 beds is under construction at 178-184, Greenhill Road ('Greenwood Lodge'), and a scheme at The Cavendish Centre, Winnall has received consent (88 beds). There is, therefore, a substantial amount of student accommodation that has recently been completed or remains in the 'pipeline' (over 300 beds).
- 2.21 In view of the above the SHMA concluded that the current and future needs of the student population would be met by the existing accommodation provided by the main education establishments within Winchester, or planned developments. There was no requirement to increase the overall housing need on the basis of planned student growth or to set out any specific interventions. As noted above, there remain substantial commitments recently completed or in the pipeline.
- 2.22 It is understood that Winchester University's 'Estates Vision 2030' is due to be published for public consultation in early 2022. This will set out the proposed development framework for the University's campus, including a long-term (10+ years) aim of reaching 10,000 students. Such a rate of growth would be significantly lower (averaging 2%-3% per annum) than over the last 15 years or so (which averaged about 7% per annum). The Estates Vision will set out the development strategy proposed in order to achieve the University's future aims, including substantial additional student accommodation.
- 2.23 Additionally, there is an emerging potential scheme which would involve redeveloping the former River Park Leisure Centre (owned by the council) and former Police Station (already owned by the University) to expand the facilities of the Winchester School of Art (Southampton University) to create a state-of-the-art campus. The land transaction element of this plan, involving the land owned by the council, was the subject of a Cabinet report in November 2021 (CAB3324). Notwithstanding any arrangement reached with the University regarding land at North Walls, all development proposals would also need to secure planning permission before they could proceed and such proposals would need to be assessed against national and local planning policy as well as any other material planning considerations in the usual way.
- 2.24 The University does not currently have detailed plans for specific facilities at the River Park site at this early stage, but believes it could provide the opportunity for a nationally and internationally recognised centre for art, design and creative industries, education, research and innovation. This proposal is expected to lead to an increased number of students attending the Winchester campus, but there are constraints to providing additional student

accommodation on-site due to flood risk issues and other restrictions with regard to the land at North Walls. There will be a need to for further work to be undertaken by the University in liaison with the council to identify the most appropriate solutions for additional student housing provision to serve the proposed expansion if this scheme goes forward.

- 2.25 Sparsholt College provides about 400 student beds in 12 on-site halls of residence and an additional 40 rooms at the University of Winchester (Burma Road Halls). This accommodation is available to further and higher education students, with halls of residence allocated to students aged 16 and over. The College is able to satisfy demand for accommodation in most respects, with priority given to students who do not live on one of the College's recognised travel routes, or who live further away.
- 2.26 A second key issue in relation to purpose built student accommodation is the location of recent and future schemes. Priority tends to be given to 1st year students in these schemes, with students subsequently needing to find accommodation in the wider housing market (although the 'Greenwood Lodge' scheme in Greenhill Road is aimed specifically at non-1st year students). Proposals for such development often generate considerable controversy and concern, some of which is likely to be behind the desire for more control over student accommodation.
- 2.27 Allied to this is the question of whether it is possible to require that any increase in student numbers by the Universities should be subject to the provision of additional student accommodation. The Oxford Local Plan has a policy (H9) limiting new academic floorspace if a threshold number of full time students living in non-University accommodation is exceeded. Developments that would not generate an increase in student numbers are excluded, as are students that already live in Oxford or would continue to live elsewhere while studying. The Cambridge Local Plan is supportive of development of the Universities but does limit the development of specialist colleges and language schools unless they provide accommodation and facilities for non-local students. However, the scale of the Universities and student numbers in Oxford and Cambridge is very different to other locations and the approach of requiring new academic developments to provide student accommodation does not seem to be followed elsewhere.
- 2.28 The likely scale of future academic development and new student housing requires further discussion and consultation with the Universities, particularly in relation to Winchester University's proposed Estates Vision and Winchester School of Art's potential proposals for River Park. However, a planning requirement that seeks to link additional academic development to new student housing could present difficulties. For example, students can choose where they live and educational establishments tend to focus on providing accommodation for 1st year students. Much of the accommodation provided by private developers is not directly controlled by the Universities and planning policies can only control an increase in student numbers if planning

consent is needed for new buildings or changes of use. Also, relaxations of permitted development rights for the conversion of commercial buildings may mean that more academic or student accommodation could be provided in future outside the control of the local planning authority.

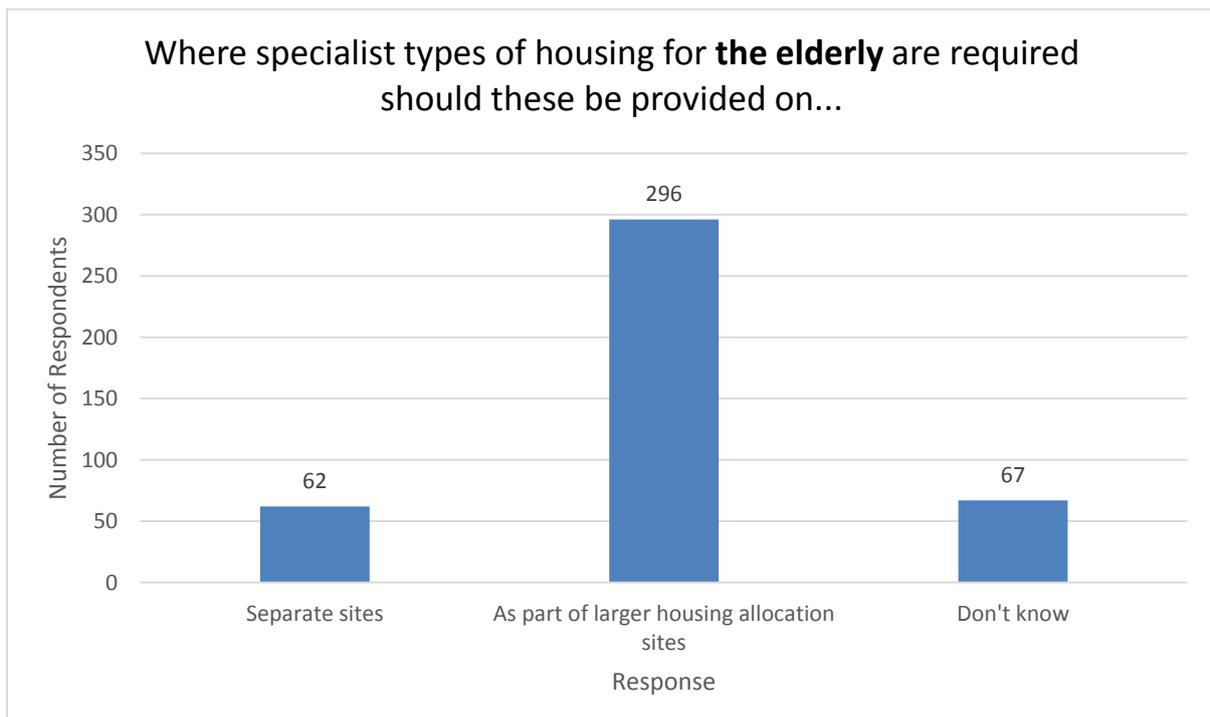
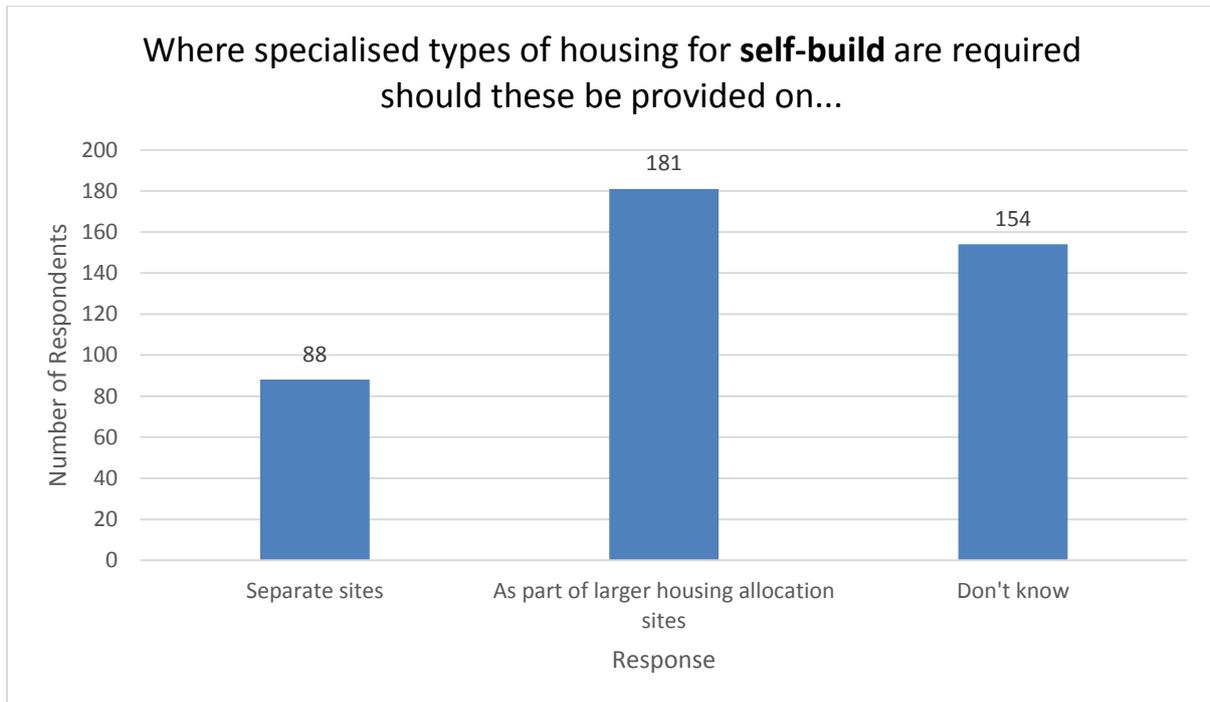
- 2.29 Some other authorities have policies restricting off-campus student accommodation in certain areas (e.g. Bath), or criteria-based policies for new student housing (e.g. Southampton). These tend to refer to the proximity of the site to the educational establishment on foot or by cycling, avoiding areas allocated for other uses and in some cases avoiding town centres. The National Planning Policy Framework (NPPF) requires planning authorities to identify and plan for the housing needs of various groups, explicitly including students (NPPF paragraph 62). So if there is an identified need for additional student accommodation, whether for University or 'market' needs, planning policies are required to respond to this.
- 2.30 Any additional controls cannot, therefore, simply refuse to meet an identified need. Any criteria-based policy would need to be tailored to Winchester's situation but, if there is an identified need or market demand for additional accommodation, the best locations in which to provide it will be those which are easily accessible to the relevant establishment on foot or by cycling. This is particularly important given the emphasis on reducing travel and carbon emissions.
- 2.31 Even if the Universities are planning adequate accommodation for their (mainly 1st year) student needs, this may not stop private providers proposing additional accommodation, especially for non-1st year students. This reflects the fact that students can choose which accommodation they use and recent private developments feature a range of accommodation standards and prices. This in turn may raise the issue of the affordability of accommodation and whether it would remain in the student accommodation stock in the longer term, although it is not for the planning system to prevent new market sectors emerging.
- 2.32 It is therefore likely that future student accommodation, where needed, should continue to be provided on or close to the Universities' campuses as far as possible, which is where most proposals have tended to come forward. Further investigation of the likely levels of growth of the Universities and the resulting need for student accommodation should continue so as to identify future needs as accurately as possible. Subject to this, options could be to include in the new Local Plan a criteria-based policy approach which may identify suitable areas for development / allocate sites, or include criteria that any planning application for student halls of residence would be required to meet in order to be permitted.

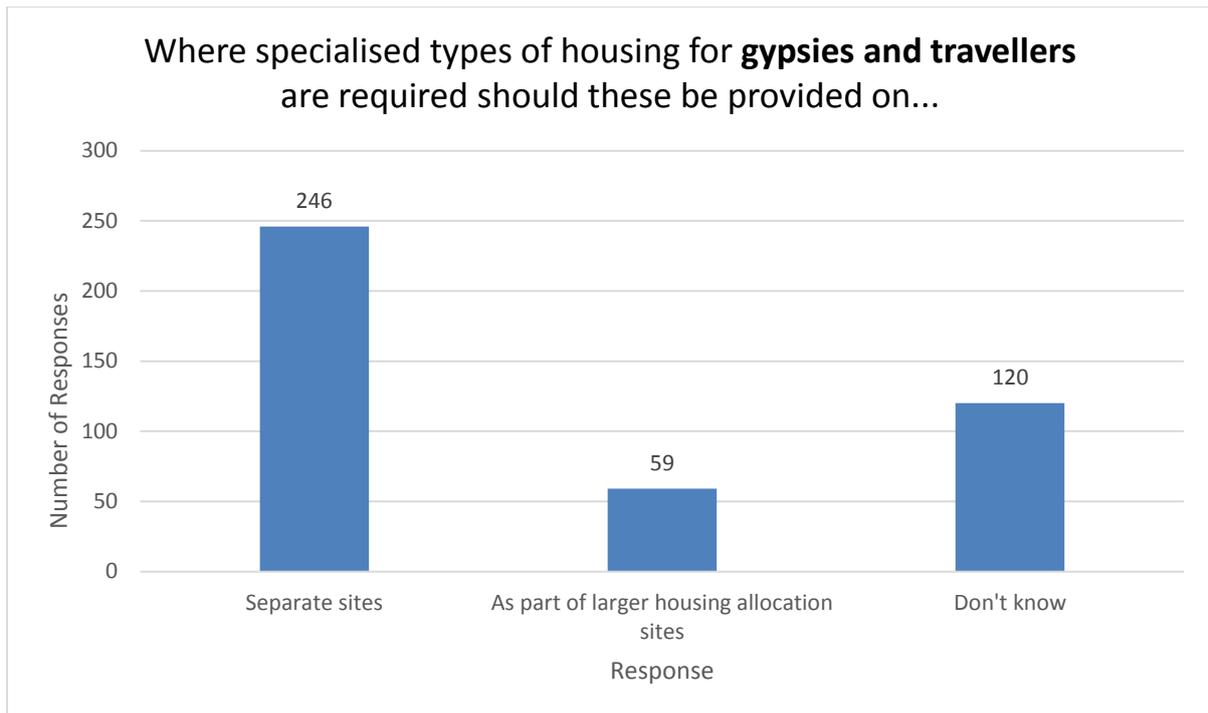
3. Specialised Housing (Homes for All Question 4)

Where specialised types of housing (such as for self-build, the elderly, or travellers) are required, should these be provided on...

...separate sites;

...as part of larger housing allocation sites?





- 3.1 This question was aimed at seeking views on whether different types of specialised housing should be developed on separate sites or as part of larger housing allocations. The responses show that most people who expressed a view preferred self-build and elderly persons' accommodation (in particular) to be developed as part of larger housing allocations. However, this was not the case for gypsy and traveller accommodation, where a significant majority of people felt this should be provided on separate sites.
- 3.2 There were also various comments specifically relating various aspects of specialised housing, or more general housing issues, as follows.

Specialist Housing: (Self-Build, Older Persons' Housing, Gypsies & Travellers)

- It is extremely challenging to integrate self/custom-build dwellings into larger allocation sites, whereas specialist accommodation (care homes, extra care, etc.) can often be successfully integrated. Traveller provision should be through extensions to existing sites rather than within larger developments – **3 comments** (C597, E1123, E112)
- There is strong demand for self-build accommodation and policies should encourage provision within settlement boundaries and as part of residential allocations – **1 comment** (E1138)
- The significance of delivering both self-build and retirement accommodation to meet demand should be recognised in the Plan with policies to encourage provision within settlement boundaries, as part of residential allocations, and on small-scale sites outside settlement boundaries – **1 comment** (E1144)

- There are a variety of models of self/custom-build homes, our preference is for separate sites to be identified based on evidence of local need – **1 comment** (E1128)
 - There are a variety of models of specialist housing for the elderly, provision is likely to be appropriate on discrete sites and as part of larger housing allocations – **1 comment** (E1128)
 - Housing for the elderly should be reasonably close to facilities – **1 comment** (L29)
 - Older persons housing and housing for others with care needs should generally be provided as part of a community with access to services and facilities, to support mixed and balanced communities – **1 comment** (E1238)
 - The Gypsy and Traveller community should be consulted to understand their requirements – **1 comment** (E1128)
 - The SDNP Authority notes that the updated GTAA will cover the whole of Winchester District and would welcome joint working on this issue. Like Winchester District, the SDNP faces issues of affordability, particularly for young people and young families, and has adopted an Affordable Housing SPD – **1 comment** (C541)
 - There should be a policy for MOD establishments to ensure the daily needs of service personnel are met (wording suggested) – **1 comment** (E1070)
 - Supports the emphasis on meeting the needs of specific groups and delivering the right type of housing – **1 comment** (E1149)
 - The questions on specialised housing are discriminatory and depend on public policy on housing requirements for communities with varying needs – **1 comment** (E1228)
- 3.3 There are a small number of comments regarding self-build accommodation which suggest that there is some demand for such development. The comments on housing for the elderly generally suggest that this should be integrated into the community and/or close to facilities. In relation to gypsies and travellers, a Gypsy and Traveller Accommodation Assessment (GTAA) is being undertaken to identify these needs in more detail. This includes the South Downs part of the District and the South Downs National Park Authority has confirmed its willingness to work with the City Council on this. One comment suggests the need for a specific policy on accommodation for service personnel.

Specialised Housing: General/Other Comments

- Some options fulfil the same purpose. What is the demand for rented accommodation? Have you asked those on the housing list for their preferences? Do we need to extend our student village accommodation any further given the capacity at our University? - **1 comment** (C326)
- How many people have been taken out of renting and what level of debt they have incurred? Many new houses are too small meaning first time buyers

soon wish to move on. Equestrian facilities need closer control – **1 comment** (H98)

- Needs a review of the minimum size and facilities within dwellings, with sufficient living rooms to work from home and adequate parking with secure access to a recharging electricity supply – **2 comments** (E937, E1074)
- Need to consider single storey housing for those who need ground floor access e.g. people with disabilities and older people – **1 comment** (C342)

3.4 Some comments ask various questions about housing needs or suggest a need to consider certain home sizes and types. These points are noted and are generally covered by the Strategic Housing Market Assessment (SHMA), including dwelling sizes and the needs of older people and those with disabilities. However, it is likely that the SHMA will need to be updated.

Assessment of Specialist Housing Needs and Issues

Self-Build

- 3.5 The consultation shows a preference for self-build accommodation to be provided as part of larger housing allocation sites. However, the free-text comments indicate a divergence of views, with some (often development interests) saying that self-build is difficult to integrate, while others support integration. The term self (and custom) build covers a range of types of development which can take the form of an individual dwelling being designed and constructed on an infill plot, for example, to an ‘estate’ of custom build units where buyers can acquire a plot and personalise their design from a ‘pattern book’.
- 3.6 While the Local Plan may allocate larger sites, and could require a proportion to be of the latter type, it cannot realistically allocate individual plots. However, the use of settlement boundaries, infilling policies and the like give a presumption in favour of developing within built-up areas, which self-builders can take advantage of. Many proposals for individual dwellings that come forward within the settlements can be classed as self or custom build.
- 3.7 A few responses suggest that planning policies should be more flexible towards self-build housing, for example by permitting such development outside settlement boundaries. However, self-build is generally a form of market housing and should comply with the same policies as other housing. Some could potentially fall within the definition of affordable housing, although this is rarely what is proposed and may be difficult to maintain as such, in which case it could potentially be considered as part of an affordable housing or ‘entry level’ exception scheme. The Right to Build Task Force suggests that self or custom-build housing could help enable affordable housing exception schemes. However, self-build should generally be expected to meet the same requirements and standards as other forms of housing and already benefits from measures such as exemption from the Community Infrastructure Levy (CIL).

- 3.8 The SHMA considers the need and demand for self-build housing and notes that since the introduction of the Council's self-build register on 1st April 2016, there had been a total of 337 expressions of interest in serviced plots of land. This has since increased to 396 persons registered (October 2021) of which 343 have indicated that they have a local connection. Government policy expects planning authorities to grant sufficient suitable consents to meet the demand identified by the register. Analysis of consents shows that the number of suitable consents granted in the relevant periods exceeded the number of people on the self-build register in these periods, meeting this requirement.
- 3.9 The SHMA noted that some local planning authorities have adopted self-build and custom housebuilding policies, typically requiring a proportion of plots within development schemes over a certain size to be offered to self-builders or as custom-build plots and/or allocation of sites solely for self-build. For instance, Teignbridge District Council adopted the first self-build policy which requires 5% of larger sites to be for custom and self-build. The SHMA also saw potential for small sites to deliver self-build through individual plots being brought forward in accordance with a design code.
- 3.10 Therefore, the SHMA recommended that a specific planning policy should be developed to help promote and encourage delivery of self-build and custom housebuilding. It considered that the policy should be flexible to provide for serviced plots to be delivered as part of larger schemes as well as providing support for opportunities on suitable smaller sites. If demand failed to materialise for the self-build plots after an extended period of marketing, the SHMA recommended scope to allow conventional housing, which would then be subject to affordable housing requirements. Many of the sites promoted for residential development through the SHELAA mention the possibility of self or custom-build housing, either as part of a mixed residential scheme or as the sole use of a small site.
- 3.11 The SHMA confirmed that self-build serviced plots should not be seen as an alternative to affordable housing provision and any Local Plan policy should make this clear. Currently, Government policy prevents affordable housing being sought on schemes of 10 or less dwellings, so this is likely to apply to most self and custom build developments. A Local Plan policy should also be clear that self and custom build housing will be subject to the same requirements as other residential schemes, including complying with settlement boundaries or infilling policies.

Housing for the Elderly

- 3.12 Section 1 above considers the need for elderly persons' housing, as evidenced by the SHMA. Question 3 asks whether this should be provided as part of larger housing allocations and there is strong support for this. The 'free-text' comments are also supportive of the provision of older persons' housing as part of wider allocations and within existing communities where there are opportunities to access support and facilities. Given the need for

additional elderly persons' housing, it is recommended that the new Local plan will need to adopt more proactive policies towards its provision.

- 3.13 New Local Plan policies on housing for the elderly could, for example, seek a proportion of housing suitable for older people or those with disabilities on larger housing sites, and/or allocate specific sites for such uses. There are, of course, various types of older persons housing (e.g. dementia care, extra care, retirement villages, etc), as discussed in section 1 above. Few sites promoted through the SHELAA refer specifically to housing for the elderly, although some refer to providing a mix of housing, which could include older persons' housing. The implications for viability of requiring the provision of various types of housing for the elderly on larger residential housing sites will be tested through the viability assessment which has been commissioned.

Gypsies and Travellers

- 3.14 The majority of people responding to this question preferred gypsy and traveller accommodation to be provided on separate sites. One respondent suggests that the traveller community needs to be consulted and this is being done through an updated Gypsy and Traveller Accommodation Assessment (GTAA), which has been commissioned. The South Downs National Park Authority has confirmed its desire to include the part of the District within the National Park and this is being done so as to arrive at an up to date District-wide requirement.
- 3.15 Government advice is clear that gypsy and traveller needs must be assessed and planned for, and the updated GTAA is an important part of this. An additional piece of work assessing the potential to meet any needs arising within existing traveller sites has also been commissioned, as many of the needs arising are likely to relate to existing family sites.
- 3.16 The Local Plan will need to make adequate provision for gypsies and travellers as required by Government advice, and this will be informed by the updated GTAA. Whether this can be achieved on existing sites will depend on the scale of need identified and the outcome of the additional study of potential site delivery. New traveller sites can be difficult to identify and only one (currently unauthorised) site has been promoted through the Strategic Housing and Employment Land Availability Assessment (SHELAA). Therefore, if significant additional provision is needed by way of a new site(s) this may be most deliverable if it forms an element of a larger housing site allocation. However, the desire of most respondents to avoid this is noted and such an approach should only be adopted if necessitated by the scale of need identified.
- 3.17 Most of the existing local policies on gypsies and travellers are contained in the Winchester Gypsy and Traveller Development Plan Document (DPD), adopted in 2019. The new Local Plan will replace this so it will be necessary to review and update the various criteria-based policies, site safeguarding

policy, and site allocations in the DPD and other parts of the current Local Plan.

Other Issues

- 3.18 A comment is made suggesting there should be a policy on MOD sites to enable the needs of service personnel to be met. The SHMA considered the needs of service personnel and engaged directly with the MoD. There has been recent additional development/redevelopment at Worthy Down Barracks, with provision for 'single living accommodation' and service families. Accordingly, at the time of the SHMA the MoD considered there was sufficient provision to accommodate existing and future service personnel and their families within Winchester.
- 3.19 Sir John Moore Barracks is due to close and the MoD have stated that this is likely to free up the houses currently occupied by service personnel. Therefore, there are unlikely to be additional current or future needs for service personnel accommodation. If such needs were identified, the retention or replacement of accommodation at Sir John Moore Barracks would be a suitable means of providing for them.
- 3.20 The existing Local Plan contains a policy (MTRA5) which relates to training establishments in the countryside, including several military sites. There will need to be a review of the ongoing need for such a policy, so there is scope to retain or amend this if necessary.