

H5 - meeting housing needs

- Support - 20
- Neither support of object - 14
- Object - 29

The changes to the supporting text and the Local Plan policies have not only been informed by the responses to the Regulation 18 consultation but they have also taken on board any additional feedback that has come out of discussions/meetings with statutory consultees and members in order to improve the clarity and understanding of the contents of the Local Plan.

| Comments in support of H5 - meeting housing needs | | |
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| Respondent number | Comment | Officer comment |
| ANON-KSAR-NKS3-G Bishops Waltham Parish Council | The Parish Council welcomes that the viability of achieving the relevant needs for affordable homes will be considered at plan making stage and welcome that the new Local Plan sets clear requirements for affordable upfront as opposed to a target. Bishop's Waltham would like stringent policies to protect the allocation of affordable housing needs. The Parish Council supports the policies regarding affordable homes provision. | Noted |
| ANON-KSAR-N81K-K | <p>Welbeck is broadly supportive of this, however, it would request that some additional flexibility be introduced so that the policy wording does not hinder delivery, as housing mix should also be responsive to the local market.</p> <p>For example, as detailed in the Denmead Housing Needs Assessment (AECOM, 2022) the age structure of the population of Denmead has been shifting towards older groups in the population in recent years, leading to an older bias to its population compared to Winchester District and England as a whole. This is coupled with a bias toward larger 3+ bedroom homes. Accordingly, modelling future dwelling</p> | The policy does allow for flexibility in the form of more recent local evidence to inform planning applications. This is explained in supporting paragraph 9.32. It is not proposed that Policy H5 is a Strategic Policy in the Plan, providing confirmation that it may be updated at the Neighbourhood Plan level should that be considered appropriate by the neighbourhood planning body. |

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| | <p>requirements suggests that there is a need for new smaller to mid-sized homes, particularly relating to 2-bedroom homes. Indeed, a key issue highlighted by the Denmead Neighbourhood Plan Steering Group is the need for bungalows which can be used by the elderly for downsizing.</p> <p>Land at Mount Edgecombe Farm can deliver a mix of housing types and tenures, including affordable and retirement to meet locationally specific needs. To this end, Welbeck requests that additional flexibility be introduced to Policy H5, or special caveats are made for sites delivered by Neighbourhood Plans.</p> | <p>Nonetheless, the following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. od policy H5 as follows :</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> |
| ANON-KSAR-NK7T-N | <p>We support the provision of housing which meets specialist housing needs such as accessible, adaptable and wheelchair friendly homes. We are however concerned by Policy H5’s commitment that 30% of market housing on sites of 10 or more homes should be 1 and 2 bedroom properties. On smaller rural sites this can result in development which is not in keeping with the character of the surroundings and we therefore urge flexibility on this. There is also concern whether there is demand in the market for such a large number of 1 and 2 bedroom homes across the whole district.</p> | <p>The evidence of need for smaller dwellings is set out in the SHMA. The policy allows for the requirement to be deviated from where this is justified through evidence.</p> <p>The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows :</p> <p>For development of 10 dwellings or more, this should include the following</p> |

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| | | <p>unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> |
| <p>BHLF- KSAR- N8TK-P</p> | <p>Churchill Retirement Living are independent housebuilders specialising in sheltered housing for older people. Paragraph 1 of the PPG Housing for Older and Disabled peoples states that: "The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. ...Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking". (Paragraph 001: Reference ID 63-001-20190626). The Winchester Strategic Housing Market Assessment (SHMA) by Icen which advises that 'Winchester is projected to see a notable increase in the older person population, with the total number of people aged 65 and over projected to increase by nearly 50% over the 20-years to 2036. This compared with overall population growth of 21% and a more modest increase in the Under 65 Population (increasing by 13%) Table 6.6 of the SHMA details the housing requirements of older people in Winchester District over the Local Plan period and advises that there is a requirement for 1,171 dwellings with support or care and 812 bed spaces. The greatest requirement is housing with support that is leasehold in tenure. The delivery of an appropriate quantum of specialist older persons' housing to meet the needs of the Borough's elderly residents will be a significant challenge over the Local Plan period.</p> | <p>Agreed. The SHMA already demonstrates the overall need. It is proposed to amend the policy while still allowing for more recent localised evidence.</p> <p>Proposed Change:</p> <p>Amend ninth paragraph of Policy D5 as follows –</p> <p>Proposals for well-designed specialist and supported housing (including older persons housing) will be supported where there is an identified need, the site is in accordance with other policies</p> |

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| | <p>On that basis we commend the Council for taking active steps to increase the delivery of specialist older persons' housing and consider that, for the most part, the policy is positively prepared.</p> <p>We would however, respectfully, query the wording of the policy which states that specialist and supported housing will only be supported where there is an identified need. The SHMA already establishes there is a significant need for these forms of development.</p> | |
| <p>BHLF- KSAR-N8ZJ- U</p> | <p>Policy H5 requiring a variety of dwelling sizes and tenures is supported. Policy H5 States that development proposal should deliver arranging all types and sizes to meet housing need in accordance with the most recent evidence it also requires at least 30% of affordable dwellings for rent to be three bedrooms; 65% of total affordable homes to be 2 or 3 bed subject to the government requirements for the provision of 'first homes'; and at least 30% of market housing should be one or two bed. It is considered that, despite the flexibility offered in the initial paragraph to the policy, the specification of specific percentages is too prescriptive. For instance, Sovereign's current experience within the local housing market shows that there is very limited demand for 2 bed apartments which has resulted in Sovereign holding unsold plots. There are also affordability challenges with letting 1 and 4 bed rented accommodation where such need may be best addressed through Social Rents.</p> <p>Sovereign supports the expectation that all dwellings should meet the Nationally Described Space Standards and the requirements for all dwellings and 25% market dwellings to be built to Building Regulations M4(2). Whilst the principle of delivering 4% of all dwellings on schemes of 50 dwellings or more as M4(3) is supported we would emphasise this should be where suitable and seek clarity that wheelchair adaptable (M4 (3) (2)(a)) in many instance may be more appropriate than fully accessible (M4(3)(2)(b)). Moreover, Sovereign notes the requirement in Part M (0.12-013) of the Building Regulations states "Requirements for accessibility should be balanced against preserving historic buildings or</p> | <p>The comments regarding flexibility are understood but it is considered appropriate to include percentages to provide a guide which can be considered further in light of local circumstances.</p> <p>The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows :</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> <p>Agree comments on wheelchair housing.</p> |

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| | <p>environments. In achieving an appropriate balance it would be appropriate to take into account the advice of the local authority's conservation and access officers, English Heritage and the views of local access groups."</p> | <p>Proposed Change:</p> <p>Delete ninth para of Policy H5 and replace with the following –</p> <p><i>Accessible and adaptable homes</i> <i>Subject to site suitability, on sites of 10 homes or more 5% of all new market homes should be built to wheelchair adaptable standards and 10% of all new affordable homes should be built to wheelchair accessible standards. Subject to site suitability, all new homes not built as wheelchair user dwellings to meet the requirements of Part M4(3) should be built to accessible and adaptable standards to meet the requirements of Building Regulations M4(2).</i></p> |
| <p>BHLF- KSAR- N8BF-Y</p> | <p>Support for the appropriate flexibility on dwelling size and tenure. Clarity on what represents "compelling evidence" is needed. The objectives are too prescribed and are likely to change over the plan period. A requirement for 30% 1 & 2 bed market dwellings will not always respond to an areas character and will almost certainly adversely affect the viability of development schemes.</p> | <p>The comments regarding flexibility are understood but it is considered appropriate to include percentages to provide clarity and then allow local circumstances to justify a deviation from this.</p> |
| <p>BHLF- KSAR- N8BS-C</p> | <p>It is however recommended that the policy builds-in sufficient flexibility to accommodate factors such as changing market circumstances. Accordingly, the policy should encourage a variety of new housing options on new developments, guided by the SHMA, but could go so far as to state that there is a requirement for an increased number of</p> | <p>The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> |

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| | <p>smaller homes.</p> <p>The percentages expressed could be too restrictive in certain circumstances and is a blanket policy, to be applied across the district which has a varied market. If flexibility were built into this policy, it will allow housing mix to be considered on a site-by-site basis.</p> <p>Furthermore, outlining strict housing mix requirements can lead to delivery issues of some sites coming forward, as development may become unviable and does not reflect the best housing mix for that particular location.</p> | <p>Amend third para. of policy H5 as follows :</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> <p>The proposed dwelling mix is included in the viability evidence prepared to inform and support the emerging Local Plan.</p> |
| BHLF-KSAR-N86X-5 | <p>Strategic Policy H5: Meeting Housing Needs Gladman support 'dwelling size and tenure' provisions in Policy H5 which have been tested within the Interim Stage 1 Viability Assessment. Gladman welcome the flexibility in the wording of Policy H5 which allows self-build plots which have been unsuccessfully marketed for 12 months to be made available on the open market or built out and sold by the developer.</p> | <p>Noted.</p> |

| Comments which neither support nor object to H5 - meeting housing needs | | |
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| Respondent number | Comment | Officer comment |
| ANON-KSAR-NKAK-P | <p>CALA Homes supports the recognition within Policy H5 that developments should deliver a range of housing types and sizes to meet housing need 'in accordance with the most recent evidence'. However,</p> | <p>The comments regarding flexibility are understood but it is considered</p> |

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| | <p>CALA's recent experience is that the Council do not regularly update their housing need evidence base and continue to rely on documents which can be over a decade old and written without the benefit of fundamental changes to the housing market whether the introduction of new tenures such as First Homes; implications of national events such as Brexit / Covid or changes in supply and demand. The Local Plan should commit to the housing need evidence base to be considered under Policy H5 being updated every two years or, if the Council cannot commit to this, a recognition that applicants are able to commission this work themselves to support a housing mix being put forward for consideration at development management stage.</p> <p>CALA supports the self / custom build policy and welcome the inclusion of a marketing period if no demand can be demonstrated.</p> <p>CALA supports the approach to M4(2) and M4(3) as proportionate. It would be helpful if clarity could be provided that the M4(3) target is to be sought equally across market and affordable tenures.</p> | <p>appropriate to include percentages to provide clarity.</p> <p>The policy does allow for local evidence to be considered, including that produced by other parties. So it is not considered appropriate to include a commitment to a particular timescale for updating the district-wide needs. The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows :</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> <p>Proposed Change:</p> <p>Delete ninth para of Policy H5 and replace with the following – Agree comments on wheelchair housing. Proposed change – replace ninth para of policy H5 with the following –</p> |
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| | | <p>Accessible and adaptable homes <i>Subject to site suitability, on sites of 10 homes or more 5% of all new market homes should be built to wheelchair adaptable standards and 10% of all new affordable homes should be built to wheelchair accessible standards. Subject to site suitability, all new homes not built as wheelchair user dwellings to meet the requirements of Part M4(3) should be built to accessible and adaptable standards to meet the requirements of Building Regulations M4(2).</i></p> |
| ANON-KSAR-N8MA-5 | See attached written representations and accompanying vision document. | Noted. |
| ANON-KSAR-N8GX-P | Sites of 50 dwellings or more - there would then be no requirement for plots in designated countryside. | Noted. It is proposed to reduce the threshold for some policy requirements to be reduced to 10 dwellings or more. |
| BHLF-KSAR-N8T8-3 Olivers Battery Parish Council | If development proposals will be supported where they contribute towards meeting housing needs, it must focus more strongly on the provision of more social housing of an appropriate or mixed size, including provision outside of “affordable” housing. | Agreed. That is the aim of this policy. |
| BHLF-KSAR-N8R2-U | Hursley Parish Council and Housing Distribution Hursley Parish Council strongly supports the use of previously | Comments noted. Comments regarding the windfall allowance are dealt with in response to |

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| <p>Hursley Parish Council</p> | <p>developed land (brownfield land) ahead of green field rural sites for new development. Brownfield land is any piece of land that has previously seen development – from car parks to factories to office buildings. While a handful of these sites are valued by local communities and wildlife, the vast majority are available for a new use.</p> <p>Most brownfield land is located within urban areas, often in locations suitable to make the most of existing infrastructure, transport and services, and where many people want to live. Building on brownfield land presents an opportunity to simultaneously remove local eyesores and breathe new life into urban areas needing regeneration. Done well, it brings homes, jobs and services closer together, reduces car dependence, and enhances communities. This needn't mean tower blocks in market towns. Terraced housing and mansion blocks can provide high density homes and preserve the unique character of towns. It follows that brownfield land is a highly sustainable location for development as it avoids loss of countryside and the car dependency which comes with use of greenfield sites. This has additional importance in the context of mitigating climate change. Brownfield land is a renewable resource – as our towns and cities change, so does our use of land, meaning new brownfield land comes forward all the time. Claims that there is no brownfield land in a district are rarely correct. It is a matter of looking for it. NPPF paragraphs 119-125 contain quite extensive guidance on making effective use of land and minimising the use of greenfield sites.</p> <p>(Ref; NPPF Effective use of land – https://www.gov.uk/guidance/national-planning-policy-framework/11-making-effective-use-of-land)</p> <p>This says that strategic policies in local plans should set out a clear strategy for accommodating housing requirements in a way that makes as much use as possible of previously developed land. Planning policies should also pursue efficient use of land through higher densities, where</p> | <p>representations on policy H1, with those on the settlement hierarchy dealt with under policies SP3 and H3.</p> <p>The difference of 250 is because the Local Plan's higher figure covers the whole District (including the SDNP part), whereas the Windfall Assessment excluded the National Park part of the District.</p> <p>Although the Windfall Assessment recommends an allowance of only 45 dwellings for the MTRA3a settlements, it acknowledges that this is very modest compared to recent levels. Over the 7-year period covered by the Assessment the MTRA3a settlements delivered 80 dwellings on windfall sites, or over 6 per settlement. Coincidentally, provision over this period in Hursley was also 6 dwellings.</p> <p>The key matter of relevance for windfall is the overall contribution of windfall sites to the housing requirement, not the level of provision at a settlement level. The windfall allowance is broken down to give an indicative figure for each of the larger settlements, but this is not a target and represents a nominal estimate. It is not critical whether this is met in the settlements listed or elsewhere, although the 20 dwellings</p> |
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| | <p>appropriate. Also, Local Planning Authorities should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.</p> <p>An Urban Opportunities Study is a proactive way to meet this obligation and to find brownfield land. Passively calling for brownfield sites is unlikely to be as successful. We consider that local planning authorities should adopt a sequential, hierarchical approach to the allocation of sites for new development as this will lead to the most effective and sustainable use of land.</p> <p>The principle of Brownfield First needs to underscore this approach. Then in sequence as necessary to meet housing numbers, and as is consistent with local character and distinctiveness and a landscape-led policy:</p> <ul style="list-style-type: none"> • increased densities in existing allocations • adopt windfall allowances, both for small sites and a large site. While LPAs can be reluctant to justify a large windfall site allowance, the chances of a large industrial site becoming available during the 15 years of plan period is quite high • use of under-utilised land and buildings • urban regeneration • use of car parks - build over to leave the car park as undercroft • re-allocation of land from other current uses • suburban densification (Ref; Policy Exchange paper on Strong Suburbs for ideas – https://policyexchange.org.uk/publication/strong-suburbs/) <p>Then, if there remains any requirement for further site allocations:</p> <ul style="list-style-type: none"> • small urban sites | <p>estimate for Hursley is considered achievable given past rates.</p> <p>The Local Plan does not include a “?” requirement for Hursley, with the Regulation 18 Plan leaving the Neighbourhood Plan requirement blank, because the City Council had already communicated a zero target based on the existing Local Plan. It is left to the emerging neighbourhood plan to identify any site allocations that it concludes are appropriate to meet the needs of the village.</p> <p>Nevertheless, it is accepted that this could be confusing and it is therefore recommended that the “Windfall allowance” and “New Sites to be allocated in Hursley Neighbourhood Plan” elements of the table on page 482 of the Plan be merged, to give an overall target of 20 dwellings, with corresponding changes to policy HU1 and the explanatory text. This should be provided through the Neighbourhood Plan, but could be exceeded either by the Neighbourhood Plan itself or other schemes coming forward in the future in accordance with Local / Neighbourhood Plan policies (windfall).</p> |
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| | <p>• small rural sites to meet local need, seeking to avoid Valued Landscapes, Local Green Space and coalescence of settlements Only as a last resort should greenfield land be allocated for housing, using a Landscape-led approach. In any event Valued Landscape should be avoided if at all possible. The emerging Local Plan should have a strategy and policies to implement these principles. The recommendation of draft local plan is that all of the MTRA3a settlements (Market Towns and Rural Areas Level 3 – Villages with Defined settlement boundaries within which development and redevelopment opportunities will be supported), of which there are 13 across the district, with a total potential to accommodate 45 dwellings from windfall over a 15 year period.</p> <p>Fast forward to the conclusions at para 6.1.6 (of the Assessment of Windfall Trends and Potential document dated February 2021) which finds potential for a district wide windfall figure of 1,725 dwellings, which the report considers could be included in the emerging Local Plan. (Ref; Assessment of Windfall Trends and Potential - https://www.winchester.gov.uk/assets/attach/28099/Windfall-Assessment-Report.pdf)</p> <p>The Winchester Local Plan Draft https://www.winchester.gov.uk/planning-policy/winchester-district-local-plan-2018-2038-emerging/regulation-18-local-plan (page 240 – Table H2) includes an allowance for windfall development of 1,975 dwellings that would be counted towards the supply of homes. Notably this figure is 250 more than Winchester’s own windfall study suggests is possible and thus should be questioned closely.</p> <p>The draft plan however identifies a pot for windfall in only four of the 13 MTRA3a settlements as follows:</p> | <p>Recommended response: Amend policy HU1 as follows: Additional land will be allocated as necessary to meet local housing and other needs in the Hursley Neighbourhood Plan, including provision through site allocations or windfall for about 20 dwellings, including and any amendments to the settlement boundary. Development will be expected to:....</p> <p>Amend paragraph 14.108 and subsequent table as follows: 14.108 It is expected that there is capacity for the development of about 20 dwellings in Hursley, depending on the outcome of theeither through allocations in the emerging Neighbourhood Plan or windfall, which can be achieved as follows:</p> <p>...New Sites to be provided by allocations allocated in Hursley Neighbourhood Plan or windfall (Policy HU1).... 20</p> |
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| | <p>Hursley - 20 Otterbourne - 20 South Wonston - 20 Sutton Scotney - 20</p> <p>This number vastly exceeds the amount which the study considers is possible and notably, the biggest contributors to windfall development in the MTRA3a settlements (Littleton and Micheldever Station) don't feature in the draft plan whatsoever. This makes little sense.</p> <p>This may go back to interpretation of the settlement hierarchy because Winchester City Council has downgraded the settlements of Swanmore and Waltham Chase - previously the tier above Hursley in the hierarchy but now on the same level. The Windfall assessment for those settlements suggests each could potentially accommodate 50 dwellings, but in the draft plan that has been reduced to 20 and the residual appears to have been spread out to the four settlements listed above without explanation.</p> <p>The flip side to all of this of course is that if the pot for 'windfall' is reduced then this would have to be made up in direct allocations or via Neighbourhood Plans. We consider however that the reliance on windfall could place the local plan delivery at risk.</p> <p>Comparing Hursley (Local Plan page 481) and Sutton Scotney's (Local Plan page 499) is interesting - Sutton Scotney has no Neighbourhood Plan forthcoming and so all its 20 dwellings are in the windfall pot. In the case of Hursley there is a "?" on the Neighbourhood Plan and similarly to Sutton Scotney all of the dwellings are recorded as windfall. That is a concern as it suggests that the settlement is windfall of 20 plus + whatever the neighbourhood plan allocates. Hursley Parish therefore request that their windfall allowance should be</p> | |
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| | reduced in line with the windfall assessment with the 20 then moved into the neighbourhood plan assessment. This would not affect Winchester's overall housing numbers or distribution but would give the Neighbourhood Plan the control to allocate housing where it sees fit rather than having a floating pot of 20 which would be in addition to any neighbourhood plan allocation as the Local Plan is currently drafted. | |
| BHLF- KSAR- N87J-R Micheldever Parish Council | We feel that the type, size and tenure required to meet local need differs between different areas across the district and a more tailored approach is required, responsive to local need. | <p>The policy and supporting text does allow for this district wide position to be supplemented and updated by more locally focused work.</p> <p>The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows :</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> |
| BHLF- KSAR- N8BU-E | <p>Housing Need</p> <p>It is welcomed that at paragraph 9.14 of the Local Plan does use the Standard Method (SM) requirement advised by national policy as the starting point to determine the minimum housing requirements. The most recent published requirement dates from March 2022 and equates to 715 dwellings per annum.</p> | Comments regarding the Plan period, housing provision, the Standard Method, the 'buffer' and housing supply are addressed in the responses to Policy H1. |

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| | <p>The Plan confirms this is used as a basis for determining requirements and this is welcomed at paragraph 9.14 and Table H. However, Table H does 'back-date' the SM requirement that was relevant at the time of the previous 3 years of the Local Plan period (which was less than 715). National Planning Practice Guidance (NPPG) does not advocate this approach, and it is unclear this is a reasonable interpretation. The household projections on which the standard method is based date back to 2014, pre-dating the Local Plan period. The Plan also includes a 1,450 housing requirement 'buffer' for meeting for unmet needs in neighbouring local planning authorities, primarily within the Partnership for South Hampshire (PfSH). This allowance is also welcomed, though whilst the Plan advises the exact requirement figure is still in discussion within PfSH, it is unclear how the figure has been calculated. It is assumed this will be clarified in further work to be undertaken.</p> <p>What is evident from plan preparation across South Hampshire is that there are unmet needs arising in a number of areas including Portsmouth, Southampton, Gosport, and Havant. The first three authorities in this list have set out in recent consultations the shortfalls expected in the future with these totalling nearly 13,000 homes. This is a significant shortfall and whilst clearly Winchester cannot be expected to meet all of these needs it should be looking at developing a spatial strategy that would meet more of these needs than is currently being proposed.</p> <p>The Integrated Impact Assessment (IIA) Report does not appear to test a strategy that goes beyond what is being proposed in the consultation document. Option 1A tests an option that delivers an additional 2,000 homes but states in 4.117 that it the Council expects the PfSH to identify and deal with unmet need for housing. Whilst the PfSH provides welcome coordination on such matters it is still the responsibility for the</p> | |
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| | <p>Council's in this area to plan for unmet needs through the preparation of their local plans. Indeed, this is the only mechanism unless a joint local plan is being prepared that will take on this responsibility. The Council must therefore examine strategies that contribute more towards the unmet needs of other areas and allocate more sites for residential development in the next iteration of the local plan.</p> <p>In meeting housing requirements over the plan period, the Plan identifies a windfall provision of 1,975 dwellings based on background evidence prepared, 'Windfall Assessment ' (2021). However, paragraph 6.1.6 of the background paper, concludes that windfall allowance of 1,725 dwellings (based on 115 dwellings per annum), should be used. It is unclear where the additional 250 allowance has been identified from. In addition, the background paper acknowledges that the windfall allowance of 115 dwellings per annum, is in excess of the 70 dwellings per annum that was considered appropriate as evidence in the adopted of the current adopted Plan. Given that opportunities for windfall development would naturally be expected to decline as more potential appropriate sites are developed, if anything it would be expected this figure would be reduced.</p> <p>St. John Moore Barracks is identified for a mixed use allocation including significant residential provision within Policy W2 of the Local Plan. The plan assumes provision of 900 dwellings over the course of the plan period to 2039, based on a phased closure of the facility between 2022 and 2024. The Ministry of Defence has recently announced that this will be delayed for a further 2 years and the barracks will not be vacated until 2026.</p> <p>This decision will inevitably delay delivery of any allocation in the Plan, and therefore delivery of housing from the site in the plan period. The scale and complexity of the development and draft policy allocation will require significant details to be resolved before submission. The</p> | |
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| | <p>consequential timescales for an application preparation and submission, subsequent determination and legal obligation commitments, conditions discharge, site works, infrastructure provision etc. will very likely extend some housing delivery beyond the end of the plan period.</p> <p>Allocations at Central Winchester (formerly Silver Hill) and Station Approach are carried forward from the adopted Local Plan (Policy W7 and W8 respectively), and combined are anticipated to deliver 550 houses to meet housing needs over the plan period. It is acknowledged that these are significant opportunities to deliver redevelopment and regeneration within highly sustainable locations in the centre of Winchester.</p> <p>However, they are both long-standing and complex allocations which have to date not been subject to any outline planning permissions nor any applications currently pending determination. Some caution is advisable in their ability to deliver in the medium term, and particularly the delivery of all of the anticipated housing within the Local Plan period. Given all of the above, it is considered that further sites should be identified to meet housing requirements, particularly to take into account the strong possibility of shortfalls in the early years of the Plan, in the event there are delays to the delivery of some of the key strategic sites such as Sir John Moore Barracks, Station Approach and Central Winchester.</p> | |
| <p>BHLF- KSAR- N86H-N</p> | <p>This section of the report provides a detailed analysis of the provisions and draft policies within the Regulation 18 draft Winchester Local Plan 2019-2029 and a comparison against the current the identified need within the Plan area for much needed specialist housing for older people as set out in the section 2 of this report</p> <p>4.2. The prevalence of health issues relating to older people is likely to only rise over the next 20 years in Winchester, which includes increases in the number of people aged 65+ who need help with domestic tasks and/or support with self-care activities. This will not only put increased</p> | <p>Comments are noted. The Council has commissioned an Update to the SHMA which sets out a more up to date position on older persons housing need and supply. Policy H5 includes a requirement for all sites to address older persons needs as appropriate. It is considered that this will supplement the Plan allocations and overall the</p> |

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| | <p>pressure on health and social services in the area, it will also increase the importance of ensuring there is sufficient accommodation tailored towards the needs of older people in Winchester.</p> <p>4.3. As demonstrated in Section 2, the Winchester SHMA (Feb 2020) identifies that the Winchester District area has an increasingly ageing population and it is predicted that the population of over 65s is only expected to rise (by over 48%) over the course of the plan period. To meet the needs of this growing ageing population, it is estimated within the SHMA that an additional 1,171 additional specialist housing units for older people with a further 812 additional care bedspaces also required to meet increasing demands by the 2036.</p> <p>4.4. As part of this formal representation, Pegasus Group has undertaken an independent Assessment of the Need for Older Person Accommodation in Winchester District, to provide a more up-to date assessment of the population profile. The report identifies that based on the projected increase in the number of people aged 75+ over the period 2018- 39, there is an estimated requirement of 2,182 specialist older persons accommodation units in Winchester. There will be increased demand for all accommodation types, this includes both market and affordable units, with the largest increase in demand being for market sheltered housing units. This calculation does not factor in the need to replace older existing stock, nor does it look at potential undersupply for Winchester's existing population aged 75+. The need is therefore likely to be higher, making it vital that good quality sites for older persons accommodation are brought forward in Winchester.</p> <p>4.5. From a review of the 2019-2020 and the 2020-2021 Winchester City Council Authority Monitoring Reports (AMR), it is demonstrated that completions in 2019-20 accounted for only a net gain of 13 additional specialist care units, and there there were no completions in 2020-2021. The 2020-2021 AMR sets out that there are only a total of 104 additional specialist care units with planning permission expected to be completed by 2022/23. It is however noted that completions of specialist market and</p> | <p>policy is considered appropriate in meeting older persons housing needs.</p> |
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| | <p>affordable older persons accommodation for is not separated out within the Winchester AMRs.</p> <p>4.6. When the documented specialist care unit completions are compared to the estimated figures highlighted above, this results in a current shortfall of 2,065 specialist older persons housing units required to be delivered over the course of the plan period. This equates over 7.5% of the total housing requirement for the district over the plan period up to 2039 and over 37% of the total housing requirement once completions since the start of the local plan period and any outstanding permissions are discounted.</p> <p>4.7. Draft Policy H5 (Meeting Housing Needs) of The Regulation 18 draft Local Plan requires development proposals of 50 dwellings or more to include an element designed and marketed to meet the needs of older persons and other specialist needs in the same proportion to requirements for the site as a whole which should be informed by local needs, market intelligence and site viability. Whilst the policy requires new development to provide for new specialist accommodation for older people, it does not set out any clear guidance on what quantity of specialist housing which will be expected of developers nor does it set out any clear guidance on the mix of specialist housing which should be delivered to meet local needs.</p> <p>4.8. The Regulation 18 draft Local Plan includes a number of both retained and new sites within the Plan Area allocated for residential and mixed use development to meet the needs of the district over the course of the Plan Period. Of the sites allocated within the draft Local Plan, only 4 no. sites allocated within the draft Local Plan make specific provisions within for specialist housing for Older People. These are summarised and discussed below: Allocation W1 – Barton Farm Major Development Site, Winchester The site allocation at Barton Farm comprises a previously permitted scheme which has been brought forward by Winchester City Council as</p> | |
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| | <p>a retained allocation within the new Local Plan. The allocation is for a major mixed used development site which includes the delivery of 2000 dwellings (including 40% affordable), a local centre, primary school, nursery, retail food store, community building, health centre, park and ride facility and other supporting commercial, leisure and community uses. The draft allocation Policy wording specifies that “The development should be designed to meet the housing needs of all sectors of the community, including families, the young and older people to ensure equality and social cohesion”. This is reflected in the approved Affordable Housing statement associated with original Outline Planning Permission which requires the affordable housing provision of the development to include 60no. extra care units.</p> <p>Allocation W8 – Station Road Approach, Winchester</p> <p>Allocation W8 is related to the Station Road Regeneration Area, which includes the main entrance to Winchester Station, the Carfax Site, the Cattlemarket car park and vacant/underused sites and properties within the immediate surrounds. The site is defined in a broad way to enable a comprehensive approach to be taken to deliver a mixed use redevelopment which will be subject to a master planning process. Due to there being no fixed development plan or masterplan associated with the allocation, the associated policy W8, does not provide any restriction on the use of the site other than supporting a future ‘mixed-use development’. whilst not included within the associated draft allocation policy, the supporting text to Policy W8, does identify that potential uses for the site could include residential, ‘including exploring the potential to provide accommodation aimed at meeting the needs of older persons’</p> <p>As there are no specific defined uses associated with this site allocation, it is not possible to quantify how much, or assume any, specialist housing could be delivered through the allocation.</p> <p>Allocation W11 - Allocation University of Winchester/Royal Hampshire County Hospital, Winchester</p> | |
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| | <p>The site allocation at University of Winchester/Royal Hampshire County Hospital covers land currently occupied by the University of Winchester the Royal Hampshire County Hospital, and land south of the University Campus. The university is developing plans to consolidate and improve, including additional academic buildings and student accommodation, whilst similarly plans are being developed to improve the health care provision in the area. The site allocation allows for the redevelopment of the site which would support the retention and improvement of the hospital, whilst allowing for additional student accommodation, older persons housing or general housing, with priority given to providing student accommodation over any other uses.</p> <p>It is noted that this allocation is for a site that is not identified as either currently available or necessarily deliverable. There is no indication whether the provision of specialist housing for older persons could be delivered by this site.</p> <p>Allocation KW2 – Land Adjoining the Cart and Horses PH, Kingsworthy Allocation KW2 adjoins the eastern edge of the built up area of Kingsworthy and neighbours the Cart and Horses PH to the south. The site allocation is listed in the Hampshire Gardens Trust inventory of Hampshire gardens and parks as the former site of Kings Worthy House and its grounds and is subject to ‘blanket’ tree preservation orders. It also forms part of the settlement gap between Kings Worthy and Abbots Worthy.</p> <p>The site is allocated under policy KW2 for the delivery of older person’s housing of about 70 in addition to associated open space within the wider grounds. The sites existing use is defined as ‘former country house and grounds’, however, it is acknowledged that the country house was removed from the site in the 20th century and the has been allowed to return to open grass and woodland. It is therefore considered inappropriate to imply that the site comprises a brownfield development site.</p> <p>4.9. Despite the clearly identified local need for specialist housing for</p> | |
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| | <p>older people with the Winchester Plan Area, as outline above and within the Winchester SHMA, it is apparent that the Regulation 18 Local Plan 2019-2039 only specifically provides for a limited number of specialist housing units across a limited number of sites within Winchester and Kingsworthy.</p> <p>4.10. The draft Local Plan only provides one site allocation which specifically seeks to deliver standalone specialist housing for older people within Kingsworthy (Policy KW2), however, it is acknowledged that this site is situated on a greenfield site and within a defined Local Gap, conflicting with the Plan Objectives to prioritise the redevelopment of brownfield, previously developed land.</p> <p>4.11. Overall, on review of the above draft planning policies and allocations of the Winchester Regulation 18 draft Local Plan, it is considered that the Plan as it currently stands falls short of its requirements to provide for and meet the specific housing need for the increasing ageing population of the district. It is estimated that over the plan period, a total of 2,182 new specialist older persons accommodation (across a range of different tenures) will be required over the length of the plan period. It is clear that the current Reg 18 Draft Plan falls significantly short of meeting the demonstrable need for this level of specialist older persons accommodation across the Winchester District. It is therefore recommended that the Council reconsider other potential alternative sites for allocation to meet this estimated specialist housing need whilst also reviewing the proposed policy to ensure the range of specialist tenures which need to be provided are reflected within the emerging Local Plan, in accordance with Paragraph 62 of the NPPF.</p> <p>Full document with introduction, tables and needs assessment in SP.</p> | |
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| <p>BHLF- KSAR- N863-Z</p> | <p><u>Policy H5 Meeting Housing Needs</u></p> <p>7.29 This is wide ranging policy that address the tenure and house type mix of new housing, alongside the delivery of specialist types of housing.</p> <p><u>Self-Build and Custom Homes</u></p> <p>7.30 Policy H5 sets out a policy requirement for 6% of all units on sites over 50 dwellings to provide plots for sale to address local self or custom build need. Sites affected by this policy will inevitably have reduced revenues as serviced plots cannot be sold at the same price point as a completed dwelling. The Council's viability assessment has set out expected revenues for various house types across a number of value areas. However, there appears to be no consideration of the impact of 6% self-build / custom build housing within these value assumptions. The Viability Assessment has also made no assessment about the extent to which this policy requirement would affect the cash flow of developments as plot sale (at a reduced value) could be extended over a much longer period (12 months as per H5) than would otherwise be the case.</p> <p>7.31 The Councils SHMA (Paragraph 11.47) states that there have been 337 expressions of interest for self-build plots on the Council's self-build register since 2016. However, this figure only represents an indication of aspirational need, and may not reflect actual demand. For example, the data does not provide an indication as to how many of those on the register are in a financial position to purchase plots, or secure finance to buy and build-out plots. Under the Council's registration process, there is also scope for double counting on the register (i.e. same householder applying multiple times, or another member of the same householder also applying for a plot).</p> <p>7.32 Alongside our concerns about need/demand, it would helpful for the Council to provide an indication of how many self-build plots have been approved / refused by the Council to understand how well supply is meeting demand in the absence of a specific policy on this issue. This will help in understanding whether Policy H5 is justified. The approach currently being taken by the Council could result in significant over provision of self-build / custom build products for which there is no market demand. The Council has also not considered whether any alternative means of bringing forward sites, such as an 'exceptions policy', would be more effective than seeking to deliver self-build plots as part of larger sites. In the absence of sufficient viability and justification for this policy it is Persimmon's view that section of Policy H5 should be deleted.</p> <p>7.33 Paragraph 11.49 of the SHMA (February 2020) states that the delivery of self-build and custom housebuilding plots should not be at the expense of affordable housing provision. As such, once the</p> | <p>The approach to self and custom built homes has been incorporated into the viability assessment work undertaken to inform and support the emerging Plan.</p> <p>Comments regarding the self-build register are noted and the Council is considering how its approach can better reflect genuine need for self build, though this is constrained by the current definitions of the councils responsibility to meet need identified in period bass periods.</p> <p>The policy seeks to strike an appropriate balance between securing some self or custom build plots on larger sites and mitigating any unintended issues for their delivery.</p> |
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| | <p>Council has updated its viability work, it may be necessary to adjust some of the other non-fixed policy costs being sought by the Plan.</p> <p>7.34 Notwithstanding our overarching concerns regarding the justification for this policy, there are a number of practical considerations that the Plan fails to adequately acknowledge. Criterion a) for example, sets out that self or custom build plots should be serviced. The Policy needs to clarify what is meant by 'serviced'. Does serviced this relate highway access, gas, water, electricity and/or broadband, and to which point should the plots be serviced? Turning to criterion c) it is not clear who would be responsible for setting out the design parameters. Placing a requirement to conform to set parameters could put off some prospective self / custom builders. The requirement to provide self and custom build plots may also have a number of practical and management issue, such as:</p> <ul style="list-style-type: none"> • Phasing and completion of the wider site. • Section 106 contributions due to the exemption that applies to self-build housing. • Delivery of housing in accordance with paragraph 59 of the NPPF to boost significantly housing supply, where supply on an ad hoc basic by self-builders is likely to be slow compared with the remainder of the site or even not take place at all. • The reserve matters period running out and needing to be extended. • Ad-hoc builders turning up outside specified hours of work. • Storage of materials as there is limited room on plot and storage spills onto the market housing part of the site. • The potential for incongruous design with the wider site. This will be particularly complex given the recent Hillside Judgement, which will limit the extent to which changes can be made to planning persimmons) • Purchasers having to stop building due to unemployment/lack of funds. • Purchaser dissatisfaction where building continues on a site which was expected to finish when they moved in. | <p>It is agreed that the demand for housing built to accessible standards will exceed the 25% requirement proposed in the reg 18 draft Plan. The updated SHMA recommends that all new homes are built to at least this standard and that is the approach taken in this Plan and is reflected in the ongoing viability evidence.</p> <p>It is agreed that the section on wheelchair accessible homes should be clarified and that part of the policy has been rewritten.</p> <p>The viability work includes an assessment of the impacts of specialist and supported housing and First Homes.</p> <p>Concerns over the overall housing requirement have been considered and the Council's position is set out in the Housing Background Paper.</p> |
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Accessible and adaptable homes and Wheelchair units

- 7.35 Policy H5 sets out more stringent expectations regarding the provision of currently set out in the adopted Plan. PPG (Paragraph: 009 Reference ID: 4) a number of aspects (need, viability and site specific factors) when considering planning policies for M4(2) and M4(3) accessible housing into Local Plans. Evidence has been produced to show how the Council has met these tests.
- 7.36 In terms of need, the SHMA sets out the projected older person population and the population of those with based on ONS population estimates. Drawing together 6.18 of the SHMA advises that 25% of new market housing should be M4(2) and there is an increasing demographic trend in this cohort of the population, therefore this relates to population, not households, so should be treated with some caution to determine the quantum of this type of housing, and therefore the percentage sought by Policy H5. Furthermore, as a proportion of overall housing need, the percentage sought by Policy H5 does not appear to account for committed sites and the Council's permission (c.10,000 homes) which, for the most part, will need not comply with the Policy. It is noted that the Policy does not require Part M4(2) housing on sites that are not suitable provides no indication as to what would constitute a 'suitable' site or other criteria for a site's related to its capacity / character / level of accessibility etc.). The Council's Assessment also assumes that 100% of all dwellings will be delivered to M4(2) which is inconsistent with percentage being sought through H5 and the advice set out in the Persimmon would also question whether the Council's assumptions of £15,000 for M4(2) is likely to be too low.
- 7.37 Turning to M4(3) housing, for sites delivering 50 or more dwellings, the Plan requires 4% of all such dwellings to be built to M4(3) standard, subject to site suitability. For affordable housing, the Plan should clarify what would constitute a 'suitable' site for this purpose. It is also noted that the Council's Viability Assessment appears to only apply to affordable housing (whereas the Policy requires this standard for all housing). The Viability Assessment should be updated to assess this impact of M4(3) housing on affordable tenures. The cost assumptions in the Viability Assessment assume

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| | <p>be too low, particularly when the cost associated with M4(2) housing is £15.5 / sqm. Finally, from a practical point of view, in Persimmon's experience, Housing Associations are less willing to take on wheelchair dwellings as they can be difficult to occupy. If there is no suitable occupier then the unit could be sat unoccupied for a significant period while a suitable tenant is found. During this time the unit is not generating any income, and could have been used to house a family that is in need at the time.</p> <p><u>Specialist and Supported Housing</u></p> <p>7.38 Policy H5 requires that schemes of 50 dwellings or more should include an element designed and marketed to meet the needs of older persons, or other local specialist needs, and affordable units should be provided in the same proportion as the requirements for the site as a whole. Much like the requirement for self-build, the Plan's Viability Assessment does not appear to have factored in the reduced revenues and the reduction in developable area.</p> <p><u>First Homes</u></p> <p>7.39 The Council has tested the viability of First Homes as part of its housing mix. However, given our concerns above regarding the robustness of the Council's viability assessment (both cost and revenue assumptions), the Council may need to reduce the affordable housing percentages (or other policy costs) more than is currently proposed in the draft Plan.</p> <p><u>Affordable Housing</u></p> <p>7.40 The Plan sets out the Council expectations regarding affordable housing provision. It is noted that the Council has set out differential affordable housing requirements depending on whether a site is brownfield or greenfield and whether it is located within a Phosphate vulnerability area. In light of our comments above regarding the robustness of the Council's viability assessment (both cost and revenue assumptions), the Council may need to reduce the affordable housing percentages (or other policy costs) more than is currently proposed in the draft Plan.</p> <p>7.41 Winchester is one of the least affordable areas in the Country, but the Council appears to be prioritising other policy aspirations over the provision of new affordable housing. In this regard it is unclear to what extent the Plan will address the needs of those currently requiring affordable housing, and new affordable housing need arising through the duration of the Plan. Given that the Council is reducing affordable housing requirements in the new policy (relative to the adopted Plan), there is a risk that affordable housing need will be further exacerbated. To address this, the Council should consider whether a further uplift to its housing requirement (in addition to that already applied) would be required in order to address this likely shortfall in affordable housing provision that will result from the Plan's current approach.</p> | |
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Comments which object to H5 - meeting housing needs

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| ANON-KSAR-NKN9-H | <p>The demand for Self-Build & Custom Housebuilding arising from WCC's statutory duty to deliver suitable serviced plot planning permissions, isn't currently being met (deficit of ~192 dwellings as of the 30th of October 2022).</p> <p>This, coupled with high secondary demand levels identified within the SHMA has correctly led to CSB housing finding its place in the 'Homes for All' schedule/listing (Draft Policy H5)</p> <p>To date, accepting the current absence of CSB policy, circa 98% of CSB dwellings permitted by WCC (62% being replacement dwellings with no nett housing contribution) are for single detached properties - the demand source for this type of housing.</p> <p>It is therefore inappropriate to forego this evidence in the preparation of a draft policy written with the sole intent of satisfying the shortcomings in permission supply, rather than meeting the needs of specific people (as is the intent of Paragraph 60-62 inc. Footnote 28 of the NPPF.</p> <p>Further Paragraph 69 of the NPPF goes on to require the LPA to.</p> <p>a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on</p> | <p>The emerging Plan proposes a new requirement for larger sites to include a proportion of custom and self build on larger sites. This will boost supply and assist those seeking a self or custom build home. The Council's obligations are to meet the identified need – not match permissions to those on the register. Therefore it is considered the evidence (and policy) have been prepared in the correct manner.</p> <p>Although few of the new allocations are for sites smaller than one hectare, the overall existing supply does include many more sites which are, and overall the requirement for smaller sites is considered satisfied, with no need to specifically allocate smaller site to meet this requirement.</p> <p>The points regarding sites in Wickham is noted. This has been reconsidered in the proposed submission Plan and details</p> |

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| | <p>site no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved.</p> <p>The draft site allocations contain only two sites (WIN22 & CC15) at a scale less than a hectare, which account for 40 units of the 2685-unit new provision (1.5%); failing to meet this requirement without evident justification, even following the much relied upon 'call for small sites' completed by, and frequently referenced by the authority in February to April 2021.</p> <p>It is therefore questionable, on both grounds of the need/approach to the emerging self-build policy, the demand arising from it, and requirement for 'small sites' that site WI25, Land to the Southeast of Game Lodge, Forest Lane, Wickham has been excluded from the draft site allocation schedule.</p> <p>Notwithstanding the absence of a requirement for Wickham to deliver (subject to deliverability at Ravenswood (WI18)), and following the retraction of the initial 90–100-unit call to Parish Council, there appears to have been no consideration here, or elsewhere in the preparation of site allocations, that WCC could go some way into securing the delivery of both self-build housing and small sites - both of which they have acknowledged the demand for through the SHELAA, SHMA and Reg.18 local plan policy preparation.</p> | <p>are set out in the Development Strategy and Site Selection Background Paper.</p> |
| <p>ANON-KSAR-NKWQ-J</p> | <p>Re: specialist housing for older people.</p> <p>1. Policy fails to be based on a clear understanding of specialist housing for older people based upon the NPPG 'housing for older and disabled people' and fails to recognise distinction between the different typologies which exist: a) retirement housing/sheltered housing; b) age restricted housing; c) extra care / integrated retirement communities; and d) care homes.</p> | <p>The Council has commissioned an update to the SHMA which does distinguish between the various types of need and provides a snapshot of the supply of each type of housing at the present time. This updated evidence on need and supply indicates that there is no</p> |

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| | <p>2. failure to produce a robust evidence base that identifies the housing requirements for specialist housing for older people especially in a district with an ageing population well above the average for England.</p> <p>3. the policy is generic - it does not identify a range or target for specialist housing for older people over the plan period, with then no consequent identification for the distribution between the various typologies.</p> <p>4. There is no monitoring of what has been delivered previously, what is needed now and what is projected to be required over the plan period.</p> <p>5. apart from KW2 there are no allocations for specialist housing for older people. this means this use will rely on windfall sites coming forward. Each typology has their own locational characteristics, which differ. there is no one size fits all approach. Integrated retirement communities have greater land requirements - typically 8-10-12 acres and cannot compete in the land market with housebuilders. The failure to make adequate allocations, or to recognise the different locational characteristics and viability requirements will result in inadequate provision over the plan period. This fails to meet the 'critical' need to provide a 'better choice' of housing for older people as set out in the NPPG.</p> | <p>pressing need to allocate further specific sites for older persons housing over and above the general requirement proposed that larger sites include an element of this. Overall this flexible approach is considered appropriate and sufficient to meet the identified need.</p> |
| <p>ANON-KSAR-NKHU-7 Oliver's Battery Parish Council</p> | <p>Meeting Housing Needs (Policy H5) If development proposals will be supported where they contribute towards meeting housing needs, it must focus more strongly on the provision of more social housing of an appropriate or mixed size, including provision outside of “affordable” housing.</p> | <p>The approach to Affordable Housing is set out in H6, but overall it is considered that the approach the Plan is appropriate given the identified need and requirement to demonstrate development viability.</p> |
| <p>ANON-KSAR-NK2Q-D</p> | <p>We are concerned that the plan expects dwelling sizes “to meet the nationally described standards.” Many creative housebuilders are trying to provide new styles of residential accommodation, such as co-housing.</p> | <p>Overall it is considered essential that the council sets out a clear expectation that new dwellings (use class C3) will meet the nationally described space standards.</p> |

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| | <p>The draft London Plan Guidance is a material consideration in planning applications. Policy H16 supports the provision of largescale, purpose-built shared living developments. Hammersmith and Fulham Borough Council recently granted permission for a co-living scheme at Wood Lane. The units at Wood Lane are 24 square metres, more compact than the national recommendations but, with other shared facilities on site, such as restaurants, gyms and social space, were supported by the local authority.</p> <p>The Winchester District Plan should allow within its policies for these alternative forms of housing, needed especially by young people. At recent discussions, Andrew Palmer, Head of New Housing for the Council, emphasised the need for such provision.</p> | <p>The draft London Plan guidance is not applicable to development in Winchester.</p> |
| <p>ANON- KSAR- NKZU-S</p> | <p>Self-build and custom-build housing is included as a subsection within policy H5 and should be a housing policy in its own entirety.</p> <p>The Right to Build Registers Monitoring 2016-2021 report identifies a growing need and lack of delivery with the administration area of serviced plots for self and custom build homes. In the 202-2021 period only 31 plots were consented against a requirement from the 2017-18 period of 88 registrants.</p> <p>The WCC Authority Monitoring Report 2020-21 also identifies a total number of individuals on the Right to Build register between 2016-2021 as being 396, against a CIL exemption delivery of 197.</p> <p>The Local Plan has an opportunity to proactively address future under delivery and shortfall through the allocation of self-custom build developments, offering prospective purchasers the opportunity to live in Market Towns and the Rural Area's rather than large scale (over 60 dwelling) developments that are required to deliver 6% of onsite</p> | <p>The identification and allocation of sites is detailed in the <i>Development Strategy and Site Selection</i> Background Paper.</p> <p>The requirement for larger developments to include an element of self and custom build will supplement, not replace, the windfall supply of these homes through the existing policy approach. Therefore it is considered they will provide another option for those seeking a custom of self built home.</p> |

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| | <p>serviced plots in predominantly urban areas.</p> <p>SH26 presents an opportunity for allocation within the plan to meet existing and future needs in a rural area that has been deemed suitable for development within the SHELAA 2021 and discussed at length with Shedfield Parish Council.</p> | |
| <p>ANON-KSAR-NK4R-G</p> | <p>Strategic policy H5 – Meeting housing needs</p> <p>Policy H5 aims to support housing needs and the proposed policy is split into several sections:</p> <p>Dwelling size and tenure This area of the policy requires developments to provide a certain mix of dwelling sizes in line with the most recent evidence. However, it should be recognised that housing for older people, being specialist in nature, is often delivered on small brownfield sites separate to housing allocations or other development sites and tend to be high-density flatted developments consisting of 1 and 2 bedroomed apartments and located near town centres. Such sites tend to have a minimum amount of around 35 to 40 units.</p> <p>Given the substantial housing need for older people identified in the SHMA (para 6.28) and nature of older persons housing schemes such schemes should be exempted from providing compelling evidence to show that the scheme should be delivered to the contrary to policy.</p> <p>Recommendation:</p> <p>Add the following para to Strategic Policy H5 under the heading ‘Dwelling size and tenure’.</p> <p>Where a proposal’s characteristics make it unsuitable for the housing</p> | <p>Comments are noted. The Council has commissioned an Update to the SHMA which sets out a more up to date position on older persons housing need and supply. Policy H5 includes a requirement for all sites to address older persons needs as appropriate. It is considered that this will supplement the Plan allocations and overall the policy is considered appropriate in meeting older persons housing needs.</p> <p>The policy already allows for proposals (such as older persons housing) to demonstrate why they should not meet the need for a mix of homes, and on balance it is considered the confirmation sought by this representation is not required.</p> <p>Agree the policy should not require evidence on need in principle for older persons housing. The SHMA already demonstrates the overall need. It is proposed to amend the policy while still</p> |

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| | <p>mix or tenure identified, for example, specialist/older person accommodation, exemption from the policy will be considered on an individual basis.</p> <p>Self and custom build homes</p> <p>We support the exemption provided to self and custom build plots provided to specialist older person accommodation.</p> <p>Accessible and adaptable homes</p> <p>This element of policy H5 requires schemes of 50 dwellings or more to provide 4% of all dwellings to be built as wheelchair user dwellings to meet the requirements of Building Regulations M4(3), subject to site suitability.</p> <p>Whilst we acknowledge that PPG Paragraph 003 Reference ID: 63-003-20190626 recognises that “the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support”, the council should note that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the housing needs of older people.</p> <p>Adaptable houses do not provide the on-site support, care and companionship of specialist older persons’ housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people</p> | <p>allowing for more recent localised evidence.</p> <p>Proposed Change:</p> <p>Amend ninth paragraph of Policy D5 as follows –</p> <p>Proposals for well-designed specialist and supported housing (including older persons housing) will be supported where there is an identified need, the site is in accordance with other policies</p> |
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| | <p>saves the NHS and social services £3,490 per year. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person's housing. Housing particularly built to M4(3) standard may serve to institutionalise an older persons' scheme reducing independence contrary to the ethos of older persons and particularly extra care housing and this should be recognised within the plan.</p> <p>We would also like to remind the council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that "The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan" (Paragraph: 002 Reference ID: 10-002-20190509). M4 2 and 3 Housing has a cost implication and may serve to reduce the number of dwellings and further reduce viability especially for older persons schemes.</p> <p>Specialist and supported housing</p> <p>This section of the policy supports proposals for well-designed specialist and supported housing (including older persons housing) where there is an identified need and where the site is in accordance with other policies and is an appropriate location to allow integration into the local community, in close proximity to local facilities and services, and can be easily accessed by sustainable transport and an appropriate tenure mix is provided.</p> <p>Developers of older person's housing schemes should not be required</p> | |
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to demonstrate need given the many benefits (see below) that such developments bring and the substantial need identified within the Winchester SHMA, February 2020, Icen at para 6.28 and that makes up around 8% of housing need. As well as removing reference to older people having to identify need, consideration should be given to providing a separate policy or section to ensure support and delivery of older person's housing is given the support it deserves. This would make the plan more consistent with national policy and deliver a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.

Government's policy, as set out in para 60 of the revised NPPF, is to boost significantly, the supply of housing. Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.

In June 2019, the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001 Reference ID: 63-001-20190626 states:

“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing

needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking”.

Paragraph 003 Reference ID: 63-003-20190626 recognises that “the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.”

Thus, a range of provision needs to be planned for and recognising that housing for older people has its own requirements and cannot be successfully considered against criteria for general family housing or adaptable housing is important. Paragraph 006 Reference ID: 63-006-20190626 sets out “plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”

Benefits of Older Persons’ Housing

Older peoples housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and

effective use of public resources.

Economic

A report 'Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living" by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.'

Each person living in a home for later living enjoys a reduced risk of health challenges, contributing fiscal savings to the NHS and social care services of approximately £3,500 per year (Homes for Later Living September 2019). More detail on these financial savings is set out within the report.

A further report entitled Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000

of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open.

As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

Social

Retirement housing gives rise to many social benefits:

- Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder
- Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns.
- The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an

average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.

Environmental

The proposal provides a number of key environmental benefits by:

- Making more efficient use of land thereby reducing the need to use limited land resources for housing.
- Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.
- Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.

Whilst we acknowledge that PPG Paragraph 003 Reference ID: 63-003-20190626 recognises that “the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support’, the council should note that ensuring that residents have the ability to stay in their homes for longer is not, in itself, an appropriate manner of meeting the housing needs of older people.

Adaptable houses to meet the needs of older people do not provide the on-site support, care and companionship of specialist older persons’ housing developments nor do they provide the wider community benefits such as releasing under occupied family housing as well as savings to the public purse by reducing the stress of health and social care budgets. The Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living in specialist housing for older people saves the NHS and social

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| | <p>services £3,490 per year. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing and it should be acknowledged that although adaptable housing can assist it does not remove the need for specific older person's housing.</p> <p>It is therefore clear there will be a significant increase in older persons' over the Plan Period in Winchester and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan. The Plan should ensure that a policy is incorporated to address the need.</p> <p>Recommendation: As a minimum developers should not be required to demonstrate need for older persons housing, given the significant need and many benefits that such developments bring and as a minimum reference to this should be removed from the policy.</p> <p>Amend policy H5 para 1 under 'Specialist and Supported housing' to remove the words 'there is an identified need' as follows:</p> <p>"Proposals for well-designed specialist and supported housing (including older persons housing) will be supported where the site is in accordance with other policies and is an appropriate location to allow integration into the local community, in close proximity to local facilities and services, and can be easily accessed by sustainable transport and an appropriate tenure mix is provided".</p> <p>However, our preference would be for a stand-alone policy to meet the substantial need for older person's housing to be introduced. While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope,</p> | |
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| | <p>will provide a useful reference for the Council:</p> <p>“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations. The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”</p> | |
| <p>ANON-KSAR-NKJ4-8</p> | <p>Please see accompanying Representations</p> <p>Policy H5 - Meeting Housing Needs 5.18 Vistry Partnerships agree that the Plan needs to deliver a range of house types and sizes, in order to meet identified housing needs. However, proposed Policy H5 will need to be revised to improve its effectiveness and practical implementation as a development management tool.</p> <p>5.19 Firstly, the policy should be clearer that the mix of housing provided through a development should have regard not only to the latest evidence of need, but also to the characteristics of the site and the local area. This clarification is particularly necessary, noting that the Winchester District is geographically large and includes both urban and rural areas, where patterns of development will be very different.</p> <p>5.20 A further concern is that, at limb ‘i’, the policy proposes that at least 30% of affordable dwellings for rent (as proposed through developments) should be 3-bedroom or larger. Whilst this may be achievable on some sites, Vistry Partnerships are concerned that</p> | <p>Comments are noted.</p> <p>The policy already allows for proposals to demonstrate why they should not meet the need for a mix of homes. The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> |

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| | <p>applying a 'blanket requirement' will not be effective in practice, as the appropriate dwelling-mix will (as previously stated) depend on localised / site-specific considerations, as well as the Plan-wide evidence of need.</p> <p>5.21 Similarly, at limb 'ii', the policy envisages that "At least 65% of affordable home ownership dwellings should be 2 or 3 bedroomed houses, subject to Government requirements for the provision of 'First Homes'". Again, although this may be achievable in many cases, it is not appropriate for the policy to set out a blanket requirement, which would need to be applied regardless of the circumstances of a particular application and development proposal.</p> <p>5.22 Furthermore, at limb 'iii' the policy would require at least 30% of market housing to be provided as 1 and 2-bedroom dwellings. In effect, this would necessitate the provision of a very high number of apartments, which is unlikely to be suitable in all locations, when taking account of site constraints, characteristics and other considerations that will inform appropriate densities. For this reason, this part of Policy H5 will likely lead to a conflict with the proposed policies relating to heritage (policies HE1 to HE14), landscape and rural character (policies NE9 and NE14), as well as the NPPF Section 12 'Achieving Well-Designed Places'.</p> <p>5.23 As a separate requirement, Policy H5 proposes that developments of 50 dwellings or larger should be required to provide 6% of those dwellings as self-build plots. Vistry Partnerships do not agree that all larger developments should be required to provide a proportion of new homes as self-build plots. Based on experience elsewhere, the inclusion of self-build plots within larger developments can create significant problems during the construction stage, creating delays, visual impact of undeveloped self-build plots and reducing implementation rates overall. Instead, it is recommended that flexibility is built into the policy to take account of site-by-site circumstances including elements such as viability.</p> | <p>The policy already provides for the proposal's characteristics to be taken into account and potential demonstrate why self or custom build is not appropriate. The requirements of this emerging policy have been incorporated into the Council's viability work and overall it is considered that marketing for 12 months reaches an appropriate balance in providing an opportunity for plots to come forward and developing sites in an efficient manner with certainty for all parties.</p> |
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| | <p>5.24 Furthermore, those individuals / households looking to purchase self-build plots are often seeking to acquire land at a reduced cost. However, self/custom-build homes are not recognised in the NPPF as a form of affordable housing. This means that it is not possible for Local Plan policies to require and apply discounted values. Uptake of self-build plots therefore tends to be limited in-practice. As such, Vistry Partnerships recommend that the Plan should instead look for opportunities to allocate sites specifically for self-build development, where they have been promoted for such by the landowner.</p> <p>5.25 Overall, Vistry Partnerships consider that Policy H5 (as presently drafted), is not justified or consistent with national planning policies, nor will it be effective when used to determine planning applications. The draft policy therefore requires substantial revision in order to render it more flexible and practical. In conclusion, the policy should be reworded to:</p> <ul style="list-style-type: none"> • Remove the blanket requirement for 30% of all affordable dwellings for rent to be 3-bedroom or larger and replace with more flexibility incorporated on a site-by-site basis; • Remove the blanket requirement for 65% of affordable homes to be 2 or 3 bedroomed houses and replace with more flexibility incorporated on a site-by-site basis; • Remove the blanket requirement for at least 30% of market housing to be provided as 1 and 2-bedroom dwellings and replace with more flexibility incorporated on a site-by-site basis; and • Introduce the need for self-build plots on a site-by-site basis depending on factors such as viability. | |
| ANON-KSAR-NKJV-A | <p>Bloor Homes supports the principle of the provision of a range of housing types and tenures, and recognises the importance of meeting housing need in accordance with most recent evidence. In this context, it is noted that policy H5 includes targets for provision of housing type which 'should' be adhered to. In ensuring that the local plan is flexible and is able to respond to changes in national policy</p> | <p>The policy already allows for proposals to demonstrate why they should not meet the need for a mix of homes. The following change is proposed to ensure this is clear in the policy text.</p> |

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| | <p>and local needs (including at specific locations) through the duration of the plan period, there needs to be recognition that these targets should be applied flexibly based on local need and market considerations, which will potentially change over the course of the plan period. One size will not fit all. This should be acknowledged in the draft policy wording.</p> <p>The proposed requirement for at least 6% self-build and custom build properties is introducing further technical challenges to an already complex planning system, which will ultimately hinder the delivery of much needed homes and facilities. The health and safety complications of delivering such properties should not be underestimated and there is limited evidence that self / custom build properties are working in practice. The reality is that the additional burden such properties place on developments is significant, placing additional management time / cost / resource on projects with potentially no customer interest or uptake at the end of the process. The existence of a register is not sufficient evidence to justify such a need exists as it is simply a list with no criteria-based requirement.</p> | <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> <p>The proposed approach to custom and self build housing is based upon the evidence of need in the SHMA and self build register. The Council also regularly receives planning applications for this type of development. The policy already provides for the proposal’s characteristics to be taken not account and potential demonstrate why self or custom build is not appropriate. The requirements of this emerging policy have been incorporated into the Council’s viability work and overall it is considered that marketing for 12 months reaches an appropriate balance in providing an opportunity for plots to come forward and developing sites in an efficient manner with certainty for all parties.</p> |
| ANON-KSAR-NKUC-2 | Catesby agrees that the Plan needs to deliver a range of house types and sizes, in order to meet identified housing needs. However, proposed Policy H5 will need to be revised to improve its | Comments are noted. |

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| | <p>effectiveness and practical implementation as a development management tool.</p> <p>7.2 Firstly, the policy should be clearer that the mix of housing provided through a development should have regard not only to the latest evidence of need, but also to the characteristics of the site and the local area. This clarification is particularly necessary, noting that the Winchester District is geographically large and includes both urban and rural areas, where patterns of development will be very different.</p> <p>7.3 A further concern is that, at limb ‘i’, the policy proposes that at least 30% of affordable dwellings for rent (as proposed through developments) should be 3-bedroom or larger. Whilst this may be achievable on some sites, Catesby are concerned that applying a ‘blanket requirement’ will not be effective in practice, as the appropriate dwelling-mix will (as previously stated) will depend on localised / site-specific considerations, as well as the Plan-wide evidence of need.</p> <p>7.4 Similarly, at limb ‘ii’, the policy envisages that “At least 65% of affordable home ownership dwellings should be 2 or 3 bedroomed houses, subject to Government requirements for the provision of ‘First Homes’”. Again, although this may be achievable in many cases, it is not appropriate for the policy to set out a blanket requirement, which would need to be applied regardless of the circumstances of a particular application and development proposal.</p> <p>7.5 Furthermore, at limb ‘iii’ the policy would require at least 30% of market housing to be provided as 1 and 2-bedroom dwellings. In effect, this would necessitate the provision of a very high number of apartments, which is unlikely to be suitable in all locations, when taking account of site constraints, characteristics and other considerations that will inform appropriate densities.</p> <p>For this reason, this part of Policy H5 will likely lead to a conflict with the proposed policies relating to heritage (policies HE1 to HE14),</p> | <p>The policy already allows for proposals to demonstrate why they should not meet the need for a mix of homes. The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> <p>The policy already provides for the proposal’s characteristics to be taken not account and potential demonstrate why self or custom build is not appropriate. The requirements of this emerging policy have been incorporated into the Council’s viability work and overall it is considered that marketing for 12 months reaches an appropriate balance in providing an opportunity for plots to come forward and developing sites in an efficient manner with certainty for all parties.</p> |
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| | <p>landscape and rural character (policies NE9 and NE14), as well as the NPPF Section 12 'Achieving Well-Designed Places'.</p> <p>7.6 As a separate requirement, Policy H5 proposes that developments of 50 dwellings of larger should be required to provide 6% of those dwellings as self-build plots. Catesby do not agree that larger developments should be required to provide a proportion of new homes as self-build plots. Based on Catesby's experience elsewhere, the inclusion of self-build plots within larger developments can create significant problems during the construction stage, creating delays and reducing implementation rates overall.</p> <p>7.7 Furthermore, and again based on our experience elsewhere, those individuals / households looking to purchase self-build plots are often seeking to acquire land at a reduced cost. However, self/custom-build homes are not recognised in the NPPF as a form of affordable housing. This means that it is not possible for Local Plan policies to require and apply discounted values. Uptake of self-build plots therefore tends to be limited in-practice. As such, Catesby recommends that the Plan should instead look for opportunities to allocate sites specifically for self-build development, where they have been promoted for such by the landowner.</p> <p>7.8 With respect to 'specialist and supported housing', Catesby agree that the Plan should make provision for specialist older persons accommodation. Indeed, the Strategic Housing Market Assessment (SHMA 2020) identifies a requirement for such accommodation, stating at page 63 that;</p> <p>"A need is shown for 998 housing with support units, such as sheltered housing or retirement living, over the period to 2036, the majority of which are expected to be leasehold. There is also a need for 620 housing with care units, with a need for both market and affordable provision.</p> <p>This can be met through provision of extra care housing.</p> <p>Consideration should be given to developing bespoke affordable</p> | <p>The SHMA update set out updated information on the need and supply of older persons and supported housing. That evidence indicates that further allocations are not required to meet the identified need.</p> |
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| | <p>housing policies for extra care. Additionally, a need is shown for around 800 care or nursing home bedspaces to 2036.”</p> <p>7.9 However, rather than require all residential schemes of 50 or more dwellings to provide such specialist accommodation (an approach which is unlikely to be effective in practice), the new Local Plan should instead allocate specific additional sites for such. This will provide more certainty that the identified need for specialist accommodation will be addressed. This is indeed the approach recommended at paragraph 6.40 of the SHMA 2020;</p> <p>“To support the delivery of specialist accommodation, it may be appropriate for the Council to consider making specific land allocations for specialist housing for older persons within the new Local Plan.”</p> | |
| <p>ANON-KSAR-N8M7-U</p> | <p>Dwelling and size and tenure</p> <p>The policy provides a welcome degree of flexibility to take account of changing evidence. However, we would suggest that alongside considering the strategic housing market assessment the supporting text should also refer to the most up to date monitoring information to ensure e what has been delivered is factored into decision making.</p> <p>The policy requires at least 65% of affordable home ownership dwellings to be 2 or 3 bedroomed houses, subject to the requirements for First Homes. We assume this caveat is to take account of the First Homes cap and the initial analysis in the Viability Assessment. Because of the cap it is likely that in order to First Homes to be delivered in line with Government policy will require them to be one or two bedroomed apartments and as such it will be important to maintain flexibility with regard to housing mix.</p> <p>Self-build and custom-build housing</p> <p>Policy H5 requires 6% of homes on sites of 50 or more to be provided</p> | <p>The policy already allows for proposals to demonstrate why they should not meet the need for a mix of homes. The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> |

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| | <p>as serviced plots for self-build or custom house building. Whilst it would appear from the SHMA and self-build register that there is demand for self-build plots in Winchester the Council will need to provide more robust evidence that those on the self-build register are committed to building their own home and have the financial capacity to do so. It is also possible for individuals and organisations to register with more than one Council so there is a possibility of some double counting. The Council should therefore regularly review their self-build register and the demand for such homes to ensure that it is up to date and forms a robust evidence base which supports the approach taken.</p> <p>The Council will also need to show how it has considered other approaches to increasing the supply of self-build plots. The approaches to meet these needs is elaborated on in paragraph 57-025 and 57-014 of PPG which set out ways in which the Councils should consider supporting self & custom build. Whilst this recognises that local authorities should take account of such needs when preparing local plans these paragraphs also identify a wide range of other sources of supply. These sources need to be explored by the Councils as a means of addressing their duty rather than placing the burden on developers to meet the demand for self-build plots which rather than creating additional supply merely changes the way a unit is delivered, and in some cases delay the delivery of new homes. Until evidence is provided of how other sources could support the delivery of self-build plots the HBF consider the policy to be unjustified.</p> <p>Specialist and supported housing</p> <p>The HBF welcomes the support set out in the policy for specialist housing. However, the policy as written is not considered to be effective in meeting the needs of older people as it does not indicate, either in the policy or supporting text, how many specialist homes are</p> | <p>The Council's obligations for self and custom build homes are established in legislation and planning decisions and there is clear evidence of need. The approach has been tested through viability and overall is considered to be an appropriate approach without undue burdens being placed upon the development industry.</p> <p>The SHMA update sets out updated information on the need and supply of older persons and supported housing. It is expected that the figures for need and supply will change through the Plan period, and hence placing the most recent figures in the text of the Plan would mean it rapidly becomes out-of-date.</p> |
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| | <p>required to meet needs over the plan period. In order for this policy to be effective the Council needs to set out what the need is and that they will meet identified needs for such homes across the plan period. Ideally this will be through allocated sites but if this is not possible then the policy must be sufficiently clear as to how they should react to such applications where there is a shortfall in supply against identified needs. Stating the level of need will also ensure that there is transparency in the Council's monitoring of this policy and whether or not they have been effective in meeting the needs of older people.</p> | |
| ANON-KSAR-N8YU-5 | <p>Housing needs must focus more strongly on the provision of more social housing which meets local needs, which "affordable" housing does not. A separate policy would be helpful.</p> | <p>Policy H6 addresses affordable housing in general, with H7 providing a basis for considering affordable housing sites in the rural areas by exception. Together this is considered an appropriate approach for the Plan.</p> |
| ANON-KSAR-N8YA-H | <p>The period which self-build plots must be marketed before they can be sold on the open market or built on by the developer should be increased to 36 months.</p> | <p>Increased the period such plots should be market to 36 months could result in plots being left undeveloped and developments unfinished for an extended period of time, and</p> |
| ANON-KSAR-N8GT-J | <p>The demographic of the population of Winchester and the surrounding district is a direct reflection of the housing policies of successive councils. Winchester already has one of the highest property prices in the United Kingdom . This is a reflection of the councils willingness to allow continued development of high value housing bringing high wealth families and individuals into the area. This is counter productive. None of this demograph will make use public transport other than their season tickets to London or if forced into park and Ride by barring access to city centres. Most have more than 2 or more motor vehicles usually of high</p> | <p>Local Plan policies H7, H8 and H11 address housing needs in the countryside and together it is considered they provide an appropriate framework for addressing those needs.</p> |

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| | <p>pollutant variety . This is counter productive the the district becoming carbon neutral. in the future.</p> <p>Local working families and singles have been priced out or excluded from obtaining affordable housing particularly in rural communities and market towns .</p> <p>Rural employers cannot find staff or offer training ,because it is uneconomic for these lower skilled people to travel back into rural areas which they have been forced to leave due to lack of housing. This has further accelerated the demise of many rural crafts and activities. It also discourages enterprise and start ups businesses in these areas which could provide employment. Where such opportunities due exist they can only be accessed by travelling in private motor vehicles.</p> <p>Meanwhile we are told social housing is unprofitable</p> <p>sic. Developers high margins are reduced by building such higher density properties.</p> <p>There is no policy to discourage this or recognition the need, for families to remain in rural areas by promoting or financing low volume social housing in rural communities or market towns .</p> <p>The district council have the ability to extract funds from high value properties through the rates and levies on developers ,in order to finance social housing needs to rebuild a housing stock which was sold off during earlier decades.</p> <p>The Local Plan should make specific provision for these urgent needs to be recognised and addressed</p> | |
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| <p>ANON-KSAR-N8G3-H</p> | <p>The draft Plan places an over-reliance on large strategic housing allocations which are prone to infrastructure and cash-flow delays. More smaller sites should be encouraged around the district to sustain local communities rather than a focus on major strategic sites which are prone to economic slow-downs.</p> <p>There is insufficient provision across the district especially in the district's smaller settlements for modest development which can sustain local communities and help keep young people and new families in their established 'home' settlements.</p> <p>there is insufficient provision made in the draft Local Plan for older people and those in need of care. Specialist care-related housing need is acute yet the draft Plan only allocated one single modest site to cater for surging acute need in this vital area of older persons housing</p> | <p>Whilst many of the newly proposed sites are large, there is an existing stock of permissions which will be supplemented by new windfall sites through the plan period to provide a range of locations and size of development site. Overall it is considered that the plan does not need amending to accommodate this concern.</p> <p>The SHMA update set out updated information on the need and supply of older persons and supported housing. That evidence indicates that further allocations are not required to meet the identified need.</p> |
| <p>ANON-KSAR-N8GP-E Denmead Parish Council</p> | <p>Sites of 50 dwellings or more, in addition to allocating 6% of serviced self build, should provide one plot for gypsy/travellers. There would then be no requirement for plots in designated countryside</p> | <p>Other policies in the plan set out the Council's response to Gypsy and Travellers. But the approach outlined here raises concerns about the deliverability of plots identified in this way, as it is considered they often do not then come forward on sites even when secured through the planning system.</p> |
| <p>ANON-KSAR-N8N9-X</p> | <p>I feel it is important to provide self build and custom build housing, as it provides another form of affordable housing.</p> <p>Provision of self build and custom build housing should not be limited to sites of over 50 dwellings. There are smaller sites, which would be suitable and the whole site can be designated for this type of build eg small infill sites suitable for 2 or more homes.</p> | <p>Self and custom build housing does not fall within the definition of affordable housing.</p> <p>The Council has permitted many self and custom build homes in recent years, on individual plots or small developments. It is anticipated that this trend will continue.</p> |

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| | It should be possible to allow this type of housing on suitable sites outside a settlement boundary e.g. on an infill plot within existing housing that is close to or adjacent to a settlement boundary, and will not affect the countryside. | There are concerns that an “exceptions”-type policy advocated here would impact upon the delivery of affordable housing on rural exceptions sites under emerging policy H7, and therefore on balance, given the level of housing unaffordability in Winchester District, it is considered not appropriate. |
| ANON-KSAR-N85C-F | The policy should be refined to identify needs for specialist housing for older people specifically (with subsequent allocation of sites). | The SHMA update sets out updated information on the need and supply of older persons and supported housing. That evidence indicates that further allocations are not required to meet the identified need. |
| ANON-KSAR-NKJC-Q | Given the diversity of needs across the district, a one size fits all approach is unlikely to be justified or effective. We would suggest this is a starting point, unless site specific or local needs evidence indicates otherwise. This will ensure this policy is sufficiently flexible to endure the plan period, without recourse to partial review. | <p>The policy does allow for flexibility in the form of more recent local evidence to inform planning applications. This is explained in supporting paragraph 9.28.</p> <p>The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an</p> |

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| | | amended approach (part dwellings rounded up) – |
| ANON-KSAR-N8QS-U | <p>Only by providing for a rather higher level of growth adjoining Winchester itself, in suitable and otherwise unconstrained locations, can this be achieved within the plan area. This reflects the finding of the Plan’s own evidence base, not least its Sustainability Appraisal that concluded that “Option 1” that allocated residential sites proportional to the function of settlements in the urban hierarchy, was most sustainable. Winchester is overwhelmingly the highest order settlement in the District, accounting for 50% or more of the total employment in the Plan area; four times the size of any other employment cluster in the District. Whatever housing provision it might additionally be appropriate to make in those marginal areas adjoining the larger South Hampshire urban areas, reflected in the current local plan strategy, is a separate matter entirely.</p> <p>Not to do so, by constraining housing supply overall and providing for such demand as is demand sufficient in a large number of relatively small dispersed locations, perpetuates and in fact aggravates existing patterns of car dependency and further challenges the capacity of the highway network – leading to greater congestion and delay on the roads - while also creating further severe tightness in labour supply and public service delivery. This is in every sense unsustainable – from an economic and social perspective as well as an environmental one.</p> <p>Stagecoach can point to a clear need to increase housing supply in the plan area at Winchester itself, and considers that the single additional site identified at Sir John Moore Barracks is not able to meet needs sufficiently. Much of the future supply identified in the plan in Winchester including that arising from Barton Farm, in effect is</p> | <p>Comments are noted. The assessment and decisions concerning the level of development and Development Strategy are set out the Housing and Development Strategy and Diste Selection Background Papers respectively. Overall it is considered the Proposed Submission Plan represents an appropriate strategy for the Plan area.</p> |

meeting the deferred housing needs that have been building up since at least 2000.

Irrespective, as we point out above, we welcome the recognition that more housing is needed at Winchester reflected in the allocation of the Sir John Moore Barracks Site.

However this, and a further 550 dwellings of capacity identified at Station Approach and the Central Winchester Regeneration Area are on previously developed land that is costly and complex to deliver. As a result, a very large proportion of supply within and adjoining Winchester, with the exception of Barton Farm, is on sites where deliverability has to be a matter of some doubt. The fact that the long-standing central Winchester allocations have yet to come forward, despite development sales values among the highest in the UK and extremely supportive market conditions over the last 10 years, offers strong evidence of just how problematic delivery of these long-standing aspirations is.

Therefore, for all these reasons, we strongly urge the Council to revisit the spatial strategy with a view to much more strongly focusing housing and indeed employment allocations at and adjacent to Winchester. This is entirely in keeping with the evidence base of the plan, which shows that Winchester itself is by far the most sustainable location for development, and where development is best able to secure the full range of the Council's objectives regarding carbon mitigation, social-economic prosperity, protecting natural assets, and dealing with the crisis of housing affordability in the heart of the district.

The discussion above leads us to the view that at least 1000 additional plots should be identified adjoining Winchester, and could be justified merely to cover for difficulties in bringing the identified major sites forward, even before affordability and housing supply is

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| | <p>considered in the round. This is likely to justify a substantially greater number – especially since a very large proportion of existing housing commitments to 2031 actually meet the needs of adjoining housing market areas, not Winchester’s.</p> | |
| <p>ANON- KSAR- N85K-Q</p> | <p>Policy H5 – Meeting Housing Needs 7.1 Croudace agrees that the Plan needs to deliver a range of house types and sizes, in order to meet identified housing needs. However, proposed Policy H5 will need to be revised to improve its effectiveness and practical implementation as a development management tool. 7.2 Firstly, the policy should be clearer that the mix of housing provided through a development should have regard not only to the latest evidence of need, but also to the characteristics of the site and the local area. This clarification is particularly necessary, noting that the Winchester District is geographically large and includes both urban and rural areas, where patterns of development will be very different. 7.3 A further concern is that, at limb ‘i’, the policy proposes that at least 30% of affordable dwellings for rent (as proposed though developments) should be 3-bedroom or larger. Whilst this may be achievable on some sites, Croudace are concerned that applying a ‘blanket requirement’ will not be effective in practice, as the appropriate dwelling-mix will (as previously stated) will depend on localised / site-specific considerations, as well as the Plan-wide evidence of need. 7.4 Similarly, at limb ‘ii’, the policy envisages that “At least 65% of affordable home ownership dwellings should 2 or 3 bedroomed houses, subject to Government requirements for the provision of ‘First Homes’”. Again, although this may be achievable in many cases, it is not appropriate for the policy to set out a blanket requirement, which would need to be applied regardless of the circumstances of a particular application and development proposal.</p> | <p>Comments are noted.</p> <p>The policy already allows for proposals to demonstrate why they should not meet the need for a mix of homes. The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> <p>The policy already provides for the proposal’s characteristics to be taken not account and potential demonstrate why self or custom build is not appropriate. The requirements of this emerging policy have been incorporated into the Council’s viability work and overall it is considered that marketing for 12 months reaches an</p> |

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| | <p>7.5 Furthermore, at limb 'iii' the policy would require at least 30% of market housing to be provided as 1 and 2-bedroom dwellings. In effect, this would necessitate the provision of a very high number of apartments, which is unlikely to be suitable in all locations, when taking account of site constraints, characteristics and other considerations that will inform appropriate densities. For this reason, this part of Policy H5 will likely lead to a conflict with the proposed policies relating to heritage (policies HE1 to HE14), landscape and rural character (policies NE9 and NE14), as well as the NPPF Section 12 'Achieving Well-Designed Places'.</p> <p>7.6 As a separate requirement, Policy H5 proposes that developments of 50 dwellings of larger should be required to provide 6% of those dwellings as self-build plots. Croudace do not agree that larger developments should be required to provide a proportion of new homes as self-build plots. Based on Croudace's experience elsewhere, the inclusion of self-build plots within larger developments can create significant problems during the construction stage, creating delays and reducing implementation rates overall.</p> <p>7.7 Furthermore, and again based on our experience elsewhere, those individuals / households looking to purchase self-build plots are often seeking to acquire land at a reduced cost. However, self/custom-build homes are not recognised in the NPPF as a form of affordable housing. This means that it is not possible for Local Plan policies to require and apply discounted values. Uptake of self-build plots therefore tends to be limited in-practice. As such, Croudace recommends that the Plan should instead look for opportunities to allocate sites specifically for self-build development, where they have been promoted for such by the landowner.</p> <p>7.8 Overall, Croudace consider that Policy H5 (as presently drafted), is not justified or consistent with national planning policies, nor will it be effective when used to determine planning applications. The draft</p> | <p>appropriate balance in providing an opportunity for plots to come forward and developing sites in an efficient manner with certainty for all parties.</p> |
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| | policy therefore requires substantial revision in order to render it more flexible and practical. | |
| ANON-KSAR-N8YM-W | BSP support the provision of a range of housing types and tenures, and equally recognise the importance of meeting housing need in accordance with most recent evidence. In this context, it is noted that policy H5 includes targets for provision of housing type which 'should' be adhered to. In ensuring that the local plan is flexible and suitably response to local needs through the duration of the plan period, these targets should equally be applied flexibly based on local need which may well change over the course of the plan period. This should be equally acknowledged in the draft policy wording. | <p>The policy does allow for flexibility in the form of more recent local evidence to inform planning applications. This is explained in supporting paragraph 9.28.</p> <p>The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> |
| ANON-KSAR-NKAB-D | BSP support the provision of a range of housing types and tenures, and equally recognise the importance of meeting housing need in accordance with most recent evidence. In this context, it is noted that policy H5 includes targets for provision of housing type which 'should' be adhered to. In ensuring that the local plan is flexible and suitably response to local needs through the duration of the plan period, these targets should equally be applied flexibly based on local need which may well change over the course of the plan period. This should be equally acknowledged in the draft policy wording. | <p>The policy does allow for flexibility in the form of more recent local evidence to inform planning applications. This is explained in supporting paragraph 9.28.</p> <p>The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> |

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| | | For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) – |
| ANON-KSAR-N8XU-4 | <p>Policy H5 sets out that development proposals will be supported where they provide housing of a type, size and tenure that contributes towards meeting housing needs. Grainger Plc recognises the importance of planning for future housing needs, yet requests some additional flexibility be introduced so that the policy wording does not hinder the delivery of the extant outline consent. The considerations of housing mix should be responsive to local market requirements, along with the context of the site and its surroundings. As with similar wording provided within policy CP2 of the current WCC Local Plan Part 1, the wording of the policy should introduce an allowance for a variation to the housing mix to be justified ‘where local circumstances, or, other relevant planning considerations dictate’.</p> | <p>The policy does allow for flexibility in the form of more recent local evidence to inform planning applications. This is explained in supporting paragraph 9.28. The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> |
| ANON-KSAR-NKME-V | <p>It is considered that the approach to housing type, size and tenure needs to be flexible to cater for changing national policy in the plan period and priorities that may be identified for specific localities. One size will not fit all.</p> <p>As currently worded, policy H5 is very prescriptive in its requirements</p> | <p>The policy does allow for flexibility in the form of more recent local evidence to inform planning applications. This is explained in supporting paragraph 9.28.</p> |

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| | <p>and unwieldy, and is therefore not likely to be effective over the full period of the plan.</p> | <p>The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> |
| <p>ANON-KSAR-N81F-E</p> | <p>Bargate Homes support the provision of a range of housing types and tenures, and equally recognise the importance of meeting housing need in accordance with most recent evidence. In this context, it is noted that policy H5 includes targets for provision of housing type which ‘should’ be adhered to. In ensuring that the local plan is flexible and suitably responsive to local needs through the duration of the plan period, these targets should equally be applied flexibly based on local need which may well change over the course of the plan period. This should be equally acknowledged in the draft policy wording. Accordingly, it is suggested that parts i), ii) and iii) which specify percentages should be deleted. Due to the duration of the plan period, and the need to account for flexibility and changes in housing need, the inclusion of percentages here will make the local plan less responsive. The local plan should be based on the latest evidence base which will naturally change over time.</p> <p>Bargate Homes support the self-build/custom build policy applying only to larger sites and for the 12 month period, after which, if not</p> | <p>The need for flexibility is agreed, but the Plan should provide guidance for developers and others in considering the requirements. The policy does allow for flexibility in the form of more recent local evidence to inform planning applications. This is explained in supporting paragraph 9.28. The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an</p> |

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| | <p>taken up, the plots can be developed on the open market. Bargate Homes similarly support the exemption test, which recognises that self build/custom build will not always be appropriate for the context.</p> <p>For specialist and supported housing, Bargate Homes consider that the policy should be amended to include the same flexibility given to affordable housing. In applying the policy, the practicalities and appropriateness of providing older persons accommodation should be considered. Specialist accommodation will not always be appropriate, due to context, even on certain larger scheme.</p> | <p>amended approach (part dwellings rounded up) –</p> <p>Comments on self and custom build are noted.</p> <p>It is considered that the specialist and supported housing does set out the circumstances in which it will not be required for certain developments and therefore no additional change is considered to be required.</p> |
| ANON-KSAR-N81U-W | <p>Dwelling size and tenure Strategic Policy H5 sets out the proportion of homes of different sizes required in different tenures in three bullet points. It is unclear why these bullet points are selective and reflect only certain sizes and tenures. For example, the policy sets out a requirement for 3+ bedroom affordable homes for rent but no such requirement for 1 or 2-bedroom affordable homes for rent; a requirement for 2 or 3-bedroom affordable home ownership homes but no such requirement for 1 or 4+ bedroom homes; and a requirement for 1-2-bedroom market homes but no such requirement for 3 or 4+ homes.</p> <p>In any event, the evidential basis for these policy requirements which comes from paragraphs 8.18 to 8.33 of the SHMA does not appear justified. For example, 13% of those currently registered in need of affordable housing need 3+ bedrooms according to Table 8.6, and 24-29% will need a 3+ bedrooms over the plan period according to Tables 8.4 and 8.5. The policy nevertheless requires 30% of</p> | <p>The emerging policy included a number of broad criteria to ensure that on larger schemes the market element included sufficient smaller homes; the affordable element included sufficient larger homes; and that affordable home ownership met the identified needs and could be considered affordable, given local prices and incomes.</p> <p>These criteria have been revisited in the SHMA update and the Proposed Submission Plan reflects those revisions.</p> <p>The policy does allow for flexibility in the form of more recent local evidence to</p> |

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| | <p>affordable homes for rent to have 3+ bedrooms. The justification for this is set out in paragraph 8.22 of the SHMA which suggests that the waiting times for larger properties are long and so the provision of such properties should be prioritised. However, this fails to recognise that this has the consequence of reducing the provision of 1-bedroom properties which 64% of those of the register need.</p> <p>Additionally, the policy does not respond to or reflect the different needs in different policy areas as set out in Table 8.7 of the SHMA. The policy also does not allow for the development of a different mix of sizes where this better responds to the characteristics of a particular site. For example, if a site is most suited to the development of a block of apartments, it is unlikely that it would be appropriate to deliver larger units within the scheme.</p> <p>The policy should be amended to set out the requirement for all sizes and tenures of housing (or refer to the SHMA as appropriate); be supported by a more detailed analysis of the needs for different sizes and tenures to ensure that the provision of certain sizes and tenures does not come at the expense of others; and to provide greater flexibility to respond to the characteristics of individual sites.</p> <p>Specialist and supported housing</p> <p>The SHMA identifies a need for specialist accommodation for older people in 6.6, including a need for 998 supported homes for leasehold, 622 homes with care either for rent or as leasehold, and 812 bedspaces in care homes. This assessment appears to arise from the SHOP@ tool, which as found in the Little Sparrows, Sonning Common appeal decision does not provide a measure of the need for such accommodation. If for example, the need for such accommodation was assessed using the rates identified by the Contact Consulting model which is one of those recommended by the Housing LIN, the needs would be materially greater with a need for 2,123 supported homes and 1,173 homes with care.</p> <p>In any event, the draft Local Plan does not set out how this need will</p> | <p>inform planning applications. This is explained in supporting paragraph 9.28. The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> <p>The policy requirement for older persons does not specify what form the older persons housing should take, and does not always require bespoke Extra care or similar development with intensive service support as suggested in the representation. Therefore it is considered appropriate to require developers to consider what older persons housing needs it might be appropriate to deliver in larger housing schemes of 50 units or over.</p> |
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| | <p>be addressed. Instead, Strategic Policy H5 suggests that proposals for such accommodation will be supported and requires some on-site provision for schemes of 50 homes or more. There is no evidence that this policy will address the need for such accommodation as required by the PPG ID: 63-012-20190626 which identifies that “plans need to provide for specialist housing for older people where a need exists.” Furthermore, for specialist accommodation for older people to operate viably it is normally necessary to deliver a scheme of 20+ units so that the care and/or support can be provided cohesively. As such, it would not be appropriate to require provision on sites of 50+ homes. Instead, the normal model is for specific developments of specialist accommodation to be delivered separate from non-specialist housing, including on sites allocated for that specific purpose or delivered under a criteria-based policy.</p> <p>Strategic Policy H5 also seeks affordable housing provision as part of the specialist housing delivered. This is entirely unjustified, given that Table 6.6 of the SHMA suggests that there is already an over-provision of rental units, which will almost certainly be in the affordable sector.</p> <p>It will therefore be necessary to recalculate the need for specialist accommodation, ensure that a sufficient number of units will be delivered to meet this need on sites which are attractive to and viable to this sector, and to amend the policy requirement for affordable provision to reflect the evidence base.</p> | |
| ANON-KSAR-NKX6-R | <p>Specifically, about self-build and custom build housing and that in a development of 50 or more houses 6% must be allowed as plots. This policy point should be deleted as it simply puts pressure on developers for higher density to fulfil the dwelling quota required by WCC. Self-build and custom build plots should be feasible for those that want this within windfall.</p> | <p>It is not considered that this policy requirement would lead to increased pressure to raise the density of development.</p> |

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| <p>BHLF- KSAR- N8RP-S</p> | <p>The reference to First Homes within this policy is noted, however the Council has yet to demonstrate that this tenure will be affordable to the district's residents, or that it will not damage the ability of Registered Providers to deliver affordable housing across the area. The Viability Study: Interim Stage 1 Report (October 2022) suggests that discounts of greater than 30% will be required to deliver 2-, 3 and 4-bed houses under the £250k cap in the majority of tested value levels, and for this to be achieved developments will have to lose more affordable rent and other affordable home ownership wellings from the mix to remain viable. This is concerning given how unaffordable the area is, as it will not help deliver homes for those with the greatest need. We encourage the Council to reconsider whether it needs to implement this policy, or whether local housing needs override this in favour of delivering a greater balance of affordable homes to rent and other affordable home ownership tenures.</p> | <p>Agreed. Ongoing work in the SHMA Update does highlight the issue with the First Homes product given the house process and incomes in the Winchester Plan area. Further details are set out in that document.</p> <p>Proposed Change –</p> <p>Amend criterion ii as follows –</p> <ul style="list-style-type: none"> i. At least 65% of affordable home ownership dwellings should 2 or 3 bedroomed houses, subject to Government requirements for the provision of 'First Homes'; and |
| <p>BHLF- KSAR- N86N-U</p> | <p>Support for the appropriate flexibility on dwelling size and tenure such that variation from the target mix can be supported where there is "compelling evidence" over the duration of the plan-period. We suggest the deletion of i, ii, and iii, as including percentages in this policy are a little meaningless, given that the LP is due to extend over 15 years, and need is likely to change significantly over this period. Has the Council undertaken a robust viability appraisal of everything in this policy, and does its evidence base justify everything that is being sought?</p> <p>The threshold of 50 dwellings is considered too low. This risks having unfinished plots within medium sized developments for a significant period of time: 12 months of marketing, then further time for planning permission for the design of the plots and then construction time, which could all add up to several years. Larger sites of >150 are</p> | <p>The need for flexibility is agreed, but the Plan should provide guidance for developers and others in considering the requirements. The policy does allow for flexibility in the form of more recent local evidence to inform planning applications. This is explained in supporting paragraph 9.28. The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> |

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| | <p>more capable of integrating self build/custom build so that specific phases of development can be set aside for this purpose.</p> <p>For specialist and supported housing, the policy should be amended to include the same flexibility given to affordable housing should be given to the provision for older persons accommodation. In applying the policy, the practicalities and appropriateness of providing older persons accommodation should be considered. Specialised accommodation will not always be appropriate, due to context, even on larger (>50 dwelling schemes).</p> | <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> <p>The viability assessment work has been undertaken with all of the Local Plan policy requirements (including those in H5).</p> <p>The threshold of 50 homes for self and custom build was chosen to ensure this policy requirement applied to development which typically has a build out period similar to or longer than the 12 months proposed for plots to be marketed. Although there may be a further period where the self or custom build house comes forward through the planning system, it is not considered on balance that the disadvantages of the additional time taken for those plots to come forward outweigh the benefits of including such developments on larger schemes.</p> <p>The policy requirement for older persons does not specify what form the older persons housing should take, and does</p> |
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| | | not always require bespoke Extra Care or similar development with intensive service support as suggested in the representation. Therefore it is considered appropriate to require developers to consider what older persons housing needs it might be appropriate to deliver in larger housing schemes of 50 units or over. |
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| BHLF-KSAR-N8RK-M | <p>3.1 The Council's strategy for housing delivery over the plan period is set out in paragraphs 9.13 to 9.21. The majority of the overall requirement (64%) is to be met through existing permissions and completions. The remainder is to be provided through existing (retained) and new allocations (24%), and windfall development (12%). The supporting text to Table H2 outlines the Council's strategy of seeking to provide for housing needs in those locations which are most sustainable and can best meet the district's needs (paragraph 9.17). It also states that "less than 25% of provision is from either existing or new allocations, giving a high level of certainty over the delivery of additional housing" (paragraph 9.18).</p> <p>3.2 Whilst the delivery from existing planning permissions and completions is noted, the main purpose of this review is to positively</p> | <p>Comments noted. Comments regarding the windfall allowance are dealt with in response to representations on policy H1, with those on the settlement hierarchy dealt with under policies SP3 and H3.</p> <p>The difference of 250 is because the Local Plan's higher figure covers the whole District (including the SDNP part), whereas the Windfall Assessment excluded the National Park part of the District.</p> |

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| | <p>plan for additional housing needs. As acknowledged at paragraph 9.18, direct allocations provide a “high level of certainty”, yet the Council’s current strategy would see only 66% of the remaining requirement addressed through direct allocations. The remaining requirement (33%) would be met through windfall development, which by definition offers far less certainty. This represents a radical change from the housing strategy adopted by Council in previous Local Plans, where delivery was secured through direct allocations and no reliance was placed on windfall development. This approach has been successful in maintaining a 5-year housing land supply position and the allowing for balanced growth in the district. We are concerned that the current strategy brings with it significant uncertainty and a high risk or under-delivery. We are particularly concerned with the reliance being placed on windfall development.</p> <p>3.3 Paragraph 71 of the NPPF confirms that Councils may rely upon windfall development as part of the supply of housing. However, it also cautions that reliance on windfall development needs to be supported by compelling evidence that it will be a reliable source of supply. It goes on to confirm that any allowance should realistic. It is not clear how many of the existing commitments and permissions referenced in Table H2 are from previous windfall development but given that the Regulation 18 plan points to previous trends as justification for future windfall, it is therefore noted that a reasonable proportion of the existing 9,452 commitments and permissions has already come from windfall development. While trends show that windfall has made a positive contribution to housing delivery, it is considered that over-reliance based on past trends is flawed as it should not be assumed that such trends will continue in the same manner. The NPPF is clear that more compelling evidence is needed.</p> <p>3.4 During the previous plan period, changes in legislation brought a significant relaxation of permitted development rights that has enabled housing delivery to be boosted through the change of use and</p> | <p>The approach to development in Swanmore is explained in the Development Strategy and Site Selection Background Paper.</p> |
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| | <p>conversions of non-residential buildings such as offices, light industrial and farm buildings amongst others, without the need to apply for planning permission. However, in some instances the legislation is time limited and there is no guarantee that conversions will continue to be carried out at the same rate in the future. For example, B8 uses to residential uses no longer benefit from PD rights, so it cannot be assumed that these conversions will continue to the same extent. In addition, the number of buildings suitable for conversion is a finite resource, meaning that opportunities will likely reduce over time.</p> <p>3.5 In March 2021, the Partnership for South Hampshire (PfSH) published the findings of the Economic, Employment and Commercial Needs (including logistics) Study prepared by Stantec. The study has identified that losses of employment floorspace to residential have occurred through the use of permitted development rights, but that this relates primarily to underused or inefficiently poorer quality stock. Where improvements have been made to the remaining stock, buildings are more likely to be retained. This indicates that there is now greater equilibrium and indicates that further losses through permitted change of use is far less likely to continue at the same rate.</p> <p>3.6 Windfall sites are ordinarily found within the settlement boundary where the principle of development is acceptable, again meaning that past trends should not be used as an indication of future availability. The number of suitable and available sites will reduce over time, and unless the settlement boundary is expanded, the number of dwellings delivered on windfall sites will diminish. If a settlement boundary is to change, it should be properly evidenced and justified through the plan process to accommodate sustainable development in the form of site allocations.</p> <p>3.7 While windfall numbers are provided for settlements based on their sustainability “score”, there is no guarantee that development will come forward on the most sustainable sites within each settlement, particularly as windfall sites will not have been through a Sustainability</p> | |
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| | <p>Appraisal as part of the site selection process.</p> <p>3.8 Furthermore, such a reliance on windfall development significantly undermines the delivery of supporting infrastructure. Sites delivered on a piecemeal basis will often fall below the affordable housing threshold, particularly where they comprise infill development. Based on a windfall allowance of 1,975 homes, up to 790 affordable homes could be lost if schemes continually fall below the threshold.</p> <p>3.9 Similarly, the ability to deliver comprehensive infrastructure improvements, including transport, education and open space, is limited when development is delivered through a series of ad-hoc, small scale developments. Paragraph 11a) of the NPPF makes it clear that plans should promote a sustainable pattern of development by aligning growth and infrastructure. A reliance on windfall development will encourage ad-hoc infrastructure provision and limit the ability to deliver the strategic scale infrastructure improvements required to support growth. As an example, in Hampshire Travel Plans are only required for development of 100 or more dwellings meaning that sustainable transport measures will be missed if development comes forward through a series of small, individual planning applications.</p> <p>3.10 There are also some inconsistencies between the findings presented in the Windfall Background Paper and the allocations carried forward into the draft Local Plan. For example, the Windfall Paper has a total District wide figure of 115 dwellings for 15 years totaling 1,725 dwellings but the Local Plan proposes 1,975 windfall homes resulting in a 250 home deficit. The Local Plan also allocates 450 homes to remaining rural areas, however, the windfall assessment gives MTRA4 countryside areas a windfall of 150 resulting in another shortfall of 300 homes.</p> <p>3.11 It is acknowledged that the way in which the settlement hierarchy is set out has changed and that the individual MTRA areas have been replaced with new settlement groupings. This may go some way to explaining these inconsistencies. However, this needs to be explained</p> | |
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| | <p>and justified so that it is clear how this shortfall is to be addressed.</p> <p>3.12 For the various reasons set out above, it is not considered that a strategy based on a high plan-wide windfall allowance meets the tests of soundness set out in paragraph 35 of the NPPF. Contrary to the supporting text at paragraph 9.18 of the draft plan, this strategy does not provide a high level of certainty in terms of either quantum or location and therefore, is not considered to be positively prepared, justified or effective.</p> <p>3.13 Past trends are not necessarily an indication of future land availability and there is no guarantee that the strategy will meet the areas objectively assessed needs. The evidence which supports the strategy is flawed as it does not take into account changes in legislation or the fact that suitable windfall sites within the existing settlement boundary will diminish over time. As such, it is not considered to be an effective strategy to deliver the District’s housing requirement over the plan period.</p> <p>3.14 It is concluded that the windfall allowance should be reduced and the shortfall replaced with new site allocations – such as 90 – 100 homes in Swanmore. This will ensure development is directed to the most sustainable sites, having been assessed through a Sustainability Appraisal and site selection process, with settlement boundaries amended where appropriate to accommodate new development.</p> | |
| <p>BHLF- KSAR- N8RJ-K</p> | <p>Policy H5 - Meeting Housing Needs</p> <p>7.1 Catesby agrees that the Plan needs to deliver a range of house types and sizes, in order to meet identified housing needs. However, proposed Policy H5 will need to be revised to improve its effectiveness and practical implementation as a development management tool.</p> <p>7.2 Firstly, the policy should be clearer that the mix of housing provided through a development should have regard not only to the latest evidence of need, but also to the characteristics of the site and the local area. This clarification is particularly necessary, noting that the Winchester District is geographically large and includes both urban</p> | <p>Comments are noted.</p> <p>The policy already allows for proposals to demonstrate why they should not meet the need for a mix of homes. The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> |

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| | <p>and rural areas, where patterns of development will be very different.</p> <p>7.3 A further concern is that, at limb ‘i’, the policy proposes that at least 30% of affordable dwellings for rent (as proposed though developments) should be 3-bedroom or larger. Whilst this may be achievable on some sites, Catesby are concerned that applying a ‘blanket requirement’ will not be effective in practice, as the appropriate dwelling-mix will (as previously stated) will depend on localised / site-specific considerations, as well as the Plan-wide evidence of need.</p> <p>7.4 Similarly, at limb ‘ii’, the policy envisages that “At least 65% of affordable home ownership dwellings should 2 or 3 bedroomed houses, subject to Government requirements for the provision of ‘First Homes’”. Again, although this may be achievable in many cases, it is not appropriate for the policy to set out a blanket requirement, which would need to be applied regardless of the circumstances of a particular application and development proposal.</p> <p>7.5 Furthermore, at limb ‘iii’ the policy would require at least 30% of market housing to be provided as 1 and 2-bedroom dwellings. In effect, this would necessitate the provision of a very high number of apartments, which is unlikely to be suitable in all locations, when taking account of site constraints, characteristics and other considerations that will inform appropriate densities.</p> <p>For this reason, this part of Policy H5 will likely lead to a conflict with the proposed policies relating to heritage (policies HE1 to HE14), landscape and rural character (policies NE9 and NE14), as well as the NPPF Section 12 ‘Achieving Well-Designed Places’.</p> <p>7.6 As a separate requirement, Policy H5 proposes that developments of 50 dwellings of larger should be required to provide 6% of those dwellings as self-build plots. Catesby do not agree that larger developments should be required to provide a proportion of new homes as self-build plots. Based on Catesby’s experience elsewhere, the inclusion of self-build plots within larger developments can create</p> | <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> <p>The policy already provides for the proposal’s characteristics to be taken not account and potential demonstrate why self or custom build is not appropriate. The requirements of this emerging policy have been incorporated into the Council’s viability work and overall it is considered that marketing for 12 months reaches an appropriate balance in providing an opportunity for plots to come forward and developing sites in an efficient manner with certainty for all parties.</p> <p>The SHMA update set out updated information on the need and supply of older persons and supported housing. That evidence indicates that further allocations are not required to meet the identified need.</p> <p>The approach taken to identifying development sites in Wickham is set out</p> |
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| | <p>significant problems during the construction stage, creating delays and reducing implementation rates overall.</p> <p>7.7 Furthermore, and again based on our experience elsewhere, those individuals / households looking to purchase self-build plots are often seeking to acquire land at a reduced cost. However, self/custom-build homes are not recognised in the NPPF as a form of affordable housing. This means that it is not possible for Local Plan policies to require and apply discounted values. Uptake of self-build plots therefore tends to be limited in-practice. As such, Catesby recommends that the Plan should instead look for opportunities to allocate sites specifically for self-build development, where they have been promoted for such by the landowner.</p> <p>7.8 With respect to ‘specialist and supported housing’, Catesby agree that the Plan should make provision for specialist older persons accommodation. Indeed, the Strategic Housing Market Assessment (SHMA 2020) identifies a requirement for such accommodation, stating at page 63 that; “A need is shown for 998 housing with support units, such as sheltered housing or retirement living, over the period to 2036, the majority of which are expected to be leasehold. 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. Consideration should be given to developing bespoke affordable housing policies for extra care. Additionally, a need is shown for around 800 care or nursing home bedspaces to 2036.”</p> <p>7.9 However, rather than require all residential schemes of 50 or more dwellings to provide such specialist accommodation (an approach which is unlikely to be effective in practice), the new Local Plan should instead allocate specific additional sites for such. This will provide more certainty that the identified need for specialist accommodation will be addressed. This is indeed the approach recommended at paragraph 6.40 of the SHMA 2020; “To support the delivery of</p> | <p>in the Development Strategy and Site Selection Background Paper.</p> |
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| | <p>specialist accommodation, it may be appropriate for the Council to consider making specific land allocations for specialist housing for older persons within the new Local Plan.”</p> <p>7.10 Land South of Titchfield Lane, Wickham is a suitable site for such a development, and is promoted on a flexible basis for either care / extra care accommodation, convention residential development, or a combination of both. Catesby are in receipt of market advice which confirms that there is strong demand from operators to bring forward a care home / extra care development at this site. This provides a clear indication of deliverability.</p> <p>7.11 Overall, Catesby consider that Policy H5 (as presently drafted), is not justified or consistent with national planning policies, nor will it be effective when used to determine planning applications. The draft policy therefore requires substantial revision in order to render it more flexible, practical, positively prepared, and effective.</p> | |
| <p>BHLF- KSAR- N8RU-X</p> | <p>Renewable: The plan’s invitation to developers to encourage renewable solar energy could be restricted to commercial and agricultural roof-space, car parks, etc., removing the damage done to valued landscapes, heritage, visual and recreational amenity and the associated benefits to mental and physical health they promote, and the importance of land to grow food (food security issues).</p> <p>Water resources: It is well known that water resources and quality of water are greatly threatened: by over abstraction and phosphate and nitrate entering rivers such as the Test and Itchen and their catchment areas.</p> <p>Improvement in MTRAs: Nonetheless, improvement is required: housing that can be genuinely afforded (see note below), especially social rented; improved public transport and technological connectivity that can improve productivity and reduce work-related travel.</p> <p>Housing in villages and larger settlements: This proposal is rather nebulous and to comment meaningfully there would need to be detail</p> | <p>Whilst not all of these comments are directly relate do this policy, it is considered helpful to amend the policy to emphasise quality of development sought.</p> <p>Proposed Change:</p> <p>Amend first para. Of Policy H5 as follows</p> <p>-</p> <p>Development proposals will be supported where they provide housing of a type, size and tenure that contributes towards meeting housing needs and provides an acceptable level of amenity for its</p> |

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| | <p>on where, what and, especially, relative impacts and evidence of benefits that convincingly override the need for major infrastructure and disruption to countryside and, of course, agreement with local communities, also emphasised in proposed government changes.</p> <p>Overall: Key aims of the Regulation 18 proposals are to concentrate development within the most sustainable locations but also to protect the countryside from unnecessary development. Overall, the market towns and larger villages simply lack the space for development that can only be realised if designated countryside is sacrificed, with attendant damage to character, distinctiveness, valued landscapes and associated physical & mental health benefits, to habitats and biodiversity and which will impact adversely on local economies. Realistically, development in such areas also contributes significantly to car use, contrary to WCC’s policy on carbon emissions and its aim to become a net zero district by 2030.</p> | <p>occupiers in line with the other policies in this Plan.</p> <p>Add new para. to supporting text before 9.28:</p> <p>Meeting housing needs requires delivering houses of the right type and fit for purpose, not just sufficient numbers. The Council is keen to secure decent homes which avoid concerns over development quality, such as those set out in the TCPA “Healthy Homes” campaign. The Plan contains polices on design (D1), carbon neutrality (CN1-4), open space (NE14) and pollution and contamination (D7-8) to address these issues. The type of housing need is addressed further in this section.</p> |
| <p>BHLF- KSAR- N8ZD-N</p> | <p>7. POLICY H5 AND H6 – HOUSING MIX AND AFFORDABLE HOUSING Policy H5 – Meeting Housing Needs 7.1 Croudace agrees that the Plan needs to deliver a range of house types and sizes, in order to meet identified housing needs. However, proposed Policy H5 will need to be revised to improve its effectiveness and practical implementation as a development management tool. 7.2 Firstly, the policy should be clearer that the mix of housing provided through a development should have regard not only to the latest evidence of need, but also to the characteristics of the site and</p> | <p>Comments are noted.</p> <p>The policy already allows for proposals to demonstrate why they should not meet the need for a mix of homes. The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> |

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| | <p>the local area. This clarification is particularly necessary, noting that the Winchester District is geographically large and includes both urban and rural areas, where patterns of development will be very different.</p> <p>7.3 A further concern is that, at limb ‘i’, the policy proposes that at least 30% of affordable dwellings for rent (as proposed though developments) should be 3-bedroom or larger. Whilst this may be achievable on some sites, Croudace are concerned that applying a ‘blanket requirement’ will not be effective in practice, as the appropriate dwelling-mix will (as previously stated) will depend on localised / site-specific considerations, as well as the Planwide evidence of need.</p> <p>7.4 Similarly, at limb ‘ii’, the policy envisages that “At least 65% of affordable home ownership dwellings should be 2 or 3 bedroomed houses, subject to Government requirements for the provision of ‘First Homes’”. Again, although this may be achievable in many cases, it is not appropriate for the policy to set out a blanket requirement, which would need to be applied regardless of the circumstances of a particular application and development proposal.</p> <p>7.5 Furthermore, at limb ‘iii’ the policy would require at least 30% of market housing to be provided as 1 and 2-bedroom dwellings. In effect, this would necessitate the provision of a very high number of apartments, which is unlikely to be suitable in all locations, when taking account of site constraints, characteristics and other considerations that will inform appropriate densities. For this reason, this part of Policy H5 will likely lead to a conflict with the proposed policies relating to heritage (policies HE1 to HE14), landscape and rural character (policies NE9 and NE14), as well as the NPPF Section 12 ‘Achieving Well-Designed Places’.</p> <p>7.6 As a separate requirement, Policy H5 proposes that developments of 50 dwellings or larger should be required to provide 6% of those dwellings as self-build plots. Croudace do not agree that larger developments should be required to provide a proportion of new</p> | <p>Amend third para. of policy H5 as follows:</p> <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> <p>The policy already provides for the proposal’s characteristics to be taken not account and potential demonstrate why self or custom build is not appropriate. The requirements of this emerging policy have been incorporated into the Council’s viability work and overall it is considered that marketing for 12 months reaches an appropriate balance in providing an opportunity for plots to come forward and developing sites in an efficient manner with certainty for all parties.</p> <p>The SHMA update set out updated information on the need and supply of older persons and supported housing. That evidence indicates that further allocations are not required to meet the identified need.</p> <p>The approach taken to identifying development sites in Colden Common is</p> |
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| | <p>homes as self-build plots. Based on Croudace's experience elsewhere, the inclusion of self-build plots within larger developments can create significant problems during the construction stage, creating delays and reducing implementation rates overall.</p> <p>7.7 Furthermore, and again based on our experience elsewhere, those individuals / households looking to purchase self-build plots are often seeking to acquire land at a reduced cost. However, self/custom-build homes are not recognised in the NPPF as a form of affordable housing. This means that it is not possible for Local Plan policies to require and apply discounted values. Uptake of self-build plots therefore tends to be limited in-practice. As such, Croudace recommends that the Plan should instead look for opportunities to allocate sites specifically for self-build development, where they have been promoted for such by the landowner.</p> <p>7.8 Overall, Croudace consider that Policy H5 (as presently drafted), is not justified or consistent with national planning policies, nor will it be effective when used to determine planning applications. The draft policy therefore requires substantial revision in order to render it more flexible and practical.</p> | <p>set out in the Development Strategy and Site Selection Background Paper.</p> |
| <p>BHLF- KSAR- N8ZZ-B</p> | <p>4.57. Policy H5 sets out that development proposals will be supported where they provide housing of a type, size and tenure that contributes towards meeting housing needs. Hazeley is broadly supportive of this, however, it would request that some additional flexibility be introduced so that the policy wording does not hinder delivery, as housing mix should also be responsive to the local market.</p> <p>4.58. Land at 10 Harestock Road can deliver a mix of housing types and tenures, including affordable and retirement to meet locationally specific needs. To this end, Hazeley requests that additional flexibility be introduced to Policy H5, or special caveats are made for small to medium sized sites where viability is constrained.</p> | <p>Comments are noted.</p> <p>The policy already allows for proposals to demonstrate why they should not meet the need for a mix of homes. The following change is proposed to ensure this is clear in the policy text.</p> <p>Proposed Change:</p> <p>Amend third para. of policy H5 as follows:</p> |

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| | | <p>For development of 10 dwellings or more, this should include the following unless evidence of local needs or the circumstances of the site justifies an amended approach (part dwellings rounded up) –</p> <p>The approach taken to identifying development sites in Winchester is set out in the Development Strategy and Site Selection Background Paper.</p> |
| BHLF-KSAR-N8ZT-5 | <ul style="list-style-type: none"> • Policy H5 Meeting Housing Needs, First Homes <p>The Policy as worded suggests that at least 65% of affordable home ownership dwellings should be 2 or 3 bedroomed houses, subject to Government requirements for the provision of 'First Homes. Our initial experience of delivering First Homes has shown that it will not be possible to deliver 2-bed first homes at 30% discount and within the price cap of £250,000. To date we have found that two bed homes require a greater percentage discount, and this reduces scheme viability. Three-bedroom homes will require a further discount which will have a greater impact on scheme viability.</p> | <p>Agree that First Homes raise issues of affordability and deliverability. This has been explored further in the SHMA Update.</p> <p>Proposed Change –</p> <p>Amend criterion ii as follows –</p> <p>i. At least 65% of affordable home ownership dwellings should be 2 or 3 bedroomed houses, subject to Government requirements for the provision of 'First Homes'; and</p> |
| BHLF-KSAR-N8ZF-Q | <p>Dudsbury Homes consider this policy should identify the need for elderly persons accommodation and specialist accommodation.</p> | <p>The SHMA update sets out updated information on the need and supply of older persons and supported housing. However this data is likely to change over the Plan period and so has been omitted</p> |

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| | | from the document itself as it is likely to go quickly out of date. |
| BHLF-KSAR-N8Z1-2 | <p>The draft Policy requires 6% of homes on sites of 50 dwellings or more to be provided as serviced dwelling plots for sale to self-builders. The evidence base to the Reg 18 Local Plan does not confirm how the Council has arrived a figure of 6%. Whilst the self-build register may indicate an amount of demand, this does not provide evidence on commitment or financial capacity of those registered. Therefore, Thakeham suggests the Council need to support this requirement with a sound and robust evidence base on the need for self-build plots and how this can be supported. Thakeham also suggests the Council evidence the requirement for self-build plots to be provided at a threshold of 50 or more dwellings. This is important given the wider requirements in the Reg 18 Local Plan relating to affordable housing, biodiversity zero carbon etc. Thakeham considers that at present it has not been demonstrated that it would be financially viable for sites of this size to make an allowance for self-build plots, and suggests that larger strategic-scale sites may be the more appropriate delivery vehicle.</p> | <p>The approach to self build has been incorporated in the ongoing viability work undertaken to inform and support the emerging Plan. The threshold of 50 homes was chosen to ensure this policy requirement applied to development which typically has a build out period similar to or longer than the 12 months proposed for plots to be marketed.</p> <p>The figure of 6% was identified to ensure that the proposal provided a meaningful contribution to supply, but did not overload one scheme or location with plots at the risk of outstripping demand in that area.</p> |

| | Recommendations | Officer response |
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| Comments from SA | <p>Recommendations H5</p> <p>5.222 The following recommendations for the policy text are included to help mitigate any negative effects and strengthen any positive effects identified:</p> <ul style="list-style-type: none"> ■ Policy H5 could be strengthened by requiring the development of exception sites to respond to the setting of heritage assets and sensitivities relating to the natural environment including biodiversity. Alternatively, Policy H5 could cross reference to relevant policies that address the historic environment and the natural environment. This | <p>The Plan should be read as a whole and it is not considered necessary or appropriate to provide a cross reference to policies in the design or heritage chapters.</p> <p>Exception sites are dealt with in Policy H7 and it is considered unnecessary and potentially confusing to outline the proposed approach in policy H5.</p> |

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| | <p>approach would recognise and help to protect the potential increased sensitivity of more rural locations to new development in terms of the historic environment and biodiversity value.</p> <p>■ Policy H5 could be further strengthened by giving priority to exception sites where they are well related to essential services and sustainable modes of transport. It is recognised that these types of development will be used to help meet the housing needs of local community, however, if possible, locations at which there is reduced need to travel by car should be given priority for development.</p> | |
| Comments from HRA | | |

Strategic Policy H5 Meeting housing needs

Amendment to policy H5

Development proposals will be supported where they provide housing of a type, size and tenure that contributes towards meeting housing needs **and provides an acceptable level of amenity for its occupiers in line with the other policies in this Plan.**

Dwelling size and tenure

All dwellings will be expected to meet the nationally described space standard¹. Development proposals should deliver a range of types and sizes to meet housing need in accordance with the most recent evidence. Unless compelling evidence is provided to the contrary, proposals should include a reasonable mix of dwelling sizes. For development of 10 dwellings or more, this should include the following **unless evidence of local needs or the circumstances of the site justifies an amended approach** (part dwellings rounded up) –

- ii. At least ~~30~~ **40** % of affordable dwellings for rent should be 3 bedrooms or more;
- iii. At least 65% of affordable home ownership dwellings should be 2 or 3 bedroomed houses, ~~subject to Government requirements for the provision of 'First Homes'; and~~

¹ As set out in *Technical housing standards – nationally described space standard (2015)* or successor document

- iv. At least 30% of market housing should be 1 or 2 bedrooms.

To ensure the requirement for smaller dwellings is being met, dwellings with multiple reception rooms which are capable of being used as bedrooms will, for the purposes of this policy, be considered to have additional bedrooms².

Self-build and custom-build housing

To improve choice and variety of new housing, proposals for self-build and custom-build homes that comply with other policies in this plan will be supported.

To support self-build and custom housing, on sites of 50 dwellings or more developers should provide at least 6% of serviced dwelling plots for sale to self-builders for a period of 12 months per plot. Any serviced plot which remains unsold after 12 months of marketing at or below market value can be made available on the open market or built out and sold by the developer.

Where a proposal's characteristics make it unsuitable for self/custom build provision, for example, specialist/older person accommodation, exemption from the policy will be considered on an individual basis.

Accessible and adaptable homes

~~All affordable dwellings, and 25% of market dwellings should be built to accessible and adaptable standards to meet the requirements of Building Regulations M4(2), subject to site suitability. For schemes of 50 dwellings or more, 4% of all dwellings should be built as wheelchair user dwellings to meet the requirements of Building Regulations M4(3), subject to site suitability.~~

Subject to site suitability, on sites of 10 homes or more 5% of all new market homes should be built to wheelchair adaptable standards to meet the requirements of Building Regulations M4(3)(2)(a) and 10% of all new affordable homes should be built to wheelchair accessible standards to meet the requirements of Building Regulations M4(3)(2)(b).

Subject to site suitability, all new homes not built as wheelchair user dwellings to meet the requirements of Part M4(3) should be built to accessible and adaptable standards to meet the requirements of Building Regulations M4(2).

Specialist and Supported Housing

Proposals for well-designed specialist and supported housing (including older persons housing) will be supported where ~~there is an identified need,~~ the site is in accordance with other policies and is an appropriate location to allow integration into the local community, in close proximity to local facilities and services, and can be easily accessed by sustainable transport and an appropriate tenure mix is provided.

Schemes of 50 dwellings or more should ~~be~~ include an element designed and marketed to meet the needs of older persons, or other local specialist needs, and affordable units should be provided in the same proportion as the requirements for the site as a whole. The amount of specialist and supported housing should be in line with local needs, market intelligence and site viability. In applying this policy the Council will take account of the nature of the scheme and the practicalities of providing and managing affordable units.

Build to Rent

Proposals for Build to Rent housing will be supported where the site accords with other policies and is in an appropriate location and 20% of the Build to Rent units are provided (and maintained in perpetuity) at affordable private rents (at least a 20% discount to market rents inclusive of service charge).

NB This policy is subject to ongoing review. Prior to being finalised, it will need to take into account the following -

- Any revision in national policy regarding housing tenures;
- The emerging WCC Housing Strategy;
- Any further evidence on housing needs and the supply of specialist housing; and
- Ongoing viability work.

New paragraph inserted before 9.28 –

9.28 Meeting housing needs requires delivering houses of the right type and fit for purpose, not just sufficient numbers. The Council is keen to secure decent homes which avoid concerns over development quality, such as those set out in the TCPA “Healthy Homes” campaign. The Plan contains polices on design (D1), carbon neutrality (CN1-4), open space (NE14) and pollution and contamination (D7-8) to address these issues. The type of housing need is addressed further in this section.