

Policy H9: Purpose Built Student Accommodation

Overview of Comments:

Support - 7

Neither support or object - 5

Object - 7

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 H9 - Purpose Built Student Accommodation		
Respondent number	Comment	Officer comment
BHLF-KSAR-N8T8-3 Olivers Battery Parish Council ANON-KSAR-N8YU-5	Support providing purpose-built student accommodation in Winchester to reduce the pressure on family housing. The criteria regarding adequate car parking provision “avoid unacceptable increases in on-street parking in the surrounding area”, is equally relevant in Policy T2iii.	Support welcomed and the comments regarding parking provision are noted. It is important to read the LP as a whole and the requirements of policy T2iii complement those of policy H9. Recommended response: No change
ANON-KSAR-N81M-N	Support the policy in general terms, but would like to comment on criterion iv. There is a proposal to build a large block of student accommodation in Airlie Lane, Winchester. This area is very much residential and placing a large block adjacent to the existing housing is inappropriate. If the proposed plan is adopted, the criteria set out in H9 should be strictly adhered to.	Support welcomed and the comments on criterion iv are noted. This requires that development is compatible with surrounding areas but it would not be reasonable for the policy to impose a blanket restriction on student accommodation on sites adjoining existing housing. Recommended response: No change
BHLF-KSAR-N8TG-J	Welcome the recognition of the benefit of providing purpose-built student accommodation in Winchester, not	Support welcomed and comments noted.

	<p>least to reduce the pressure on privately rented family housing. Policies W10 and W11 indicate that the University of Southampton will build 350-400 student bedrooms as part of the expansion at Riverside Park site (equivalent to 100 dwellings) with the University of Winchester expected to build another 700 student bedrooms (calculated as equivalent to 200 dwellings).</p> <p>A conversion factor of 3.75 student places equals one dwelling is applied, but the government's Housing Delivery Test Measurement rule book states the national average is 2.5. WCC should use this figure to 'convert' student places to be provided by the two universities into dwellings, resulting in a figure of 420-440 not the 300 included in the plan.</p>	<p>Agreed the conversions factor of assessment of dwellings should be consistent with the Government's assessment of housing delivery. Further details are set out in the Student Housing Background Paper.</p> <p>Recommended response: Amend dwelling equivalent figures throughout Plan and evidence base to apply a 2.5 bedrooms = 1 dwelling conversion rate.</p>
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Comments which neither support nor object to H9 - purpose built student accommodation		
Respondent number	Comment	Officer comment
ANON-KSAR-NKQ5-G Curdrige Parish Council	If River Park is to be used for Higher Education, there should be student housing included in the development proposal. Apart from this, support the policy.	Comments noted. This comment relates primarily to policy W10 and is considered in detail in those policy responses. But the site is not suitable for residential development. Recommended response: No change
ANON-KSAR-N81Y-1	Policy H9 ii should be amended to allow for pedestrian/cycle facilities which may not yet exist: "The location of the accommodation is accessible to the establishment it is planned to serve by existing/proposed walking, cycling or	Comments noted. It is agreed that criterion ii should cover proposed walking or cycling facilities, but moving the reference to 'existing/proposed'.

	<p>public transport networks".</p> <p>Request that the wording of criterion v provides further clarity as follows: "the proposal is not on an allocated site which precludes such uses or where there are policies in place to protect the existing uses such as open space, employment or facilities and services".</p> <p>Paragraph 9.66 specifies that student accommodation sites should allow residents to walk to their destination (normally within 400 metres), but 80% of journeys less than a mile are undertaken on foot and the draft Local Plan refers to 15-minute neighbourhood principles. This provides the policy basis for appropriate walking distances and as a 15-minute walk distance is approximately 1.2km, the 400m constraint should be removed.</p>	<p>The suggested change to criterion v is not considered appropriate. If a site is allocated for another use it should not include student accommodation.</p> <p>Paragraph 9.66 is part of the explanatory text to policy H9 so is not a policy constraint. The text is clear that siting within 400m is the ideal, but policy H9 does not require this, referring to accommodation being 'easily accessible'.</p> <p>Recommended response: Amend policy H9, criterion ii, as follows: ii. The location of the accommodation is easily accessible to the establishment it is planned to serve by <u>existing / proposed</u> walking, cycling or <u>existing / proposed</u> public transport routes;</p>
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Comments which object to H9 - purpose built student accommodation		
Respondent number	Comment	Officer comment
BHLF-KSAR-N869-6	The evidence base for the local plan is out of date and should clarify the quantum of existing and required student accommodation over the plan period. The supply and demand for student accommodation should be considered alongside general housing. The Council's Interim Position	Comments noted. Officers have since engaged with the universities to understand better the position on student housing needs and supply. The results of

	<p>Statement on Student Accommodation to inform the Local Plan is out of date and its 'next steps' have not been implemented.</p> <p>The reference to proposed public transport in criterion ii should be removed as it is premature without a mechanism in place on how to deliver the proposed public transport. Would support additional text referring to the need for necessary facilities near to student accommodation such as convenience stores and health/wellbeing facilities. The identification of a buffer zone around the universities where such facilities would be supported would be welcomed.</p>	<p>which are set out in the Student Housing Background Paper.</p> <p>Any proposed improvements to public transport (recommended to also cover walking and cycling above) would need to be specified and either be already programmed or secured as part of a planning application. The Local Plan's policies already encourage improvements to facilities and services, whether serving the Universities or more generally.</p> <p>Recommended response: No change</p>
ANON-KSAR-NKJ1-5	<p>Support the principle of Policy H9 but request the wording of criterion (v) is amended to enable development on sites protected for open space if no alternative sites are available and any loss of open space is mitigated by improvements to existing open space: "the proposal is not on a site allocated for other uses, or where there are policies in place to protect the existing uses such as open space, employment or facilities and services, unless it can be demonstrated that no alternative sites are available and the existing use is not required or its loss can be mitigated."</p>	<p>Comments noted. The suggested change to criterion v is not considered appropriate and could weaken the Plan's protection for open space, employment land, etc. It is possible for the local planning authority to approve an application that departs from policy where other material considerations justify this. An applicant could seek to demonstrate, as part of a planning application, a need for student provision, a lack of alternative sites and mitigation for the loss of open space, etc, but such exceptional circumstances should not be incorporated into the policy.</p> <p>Recommended response: No change</p>
ANON-KSAR-NKQN-9	<p>Need to define "adequate" cycle parking provision, either with details here or by referring to a separate document or standard. "Adequate" is too vague and open to distortion.</p>	<p>Comments noted. Provision will vary for different developments and it is not realistic to specify the level of cycle</p>

		<p>parking provision for all developments within policy H9. Policies T1 and T2 deal with transport and parking provision and the Plan should be read as a whole. The explanatory text to policy H9 (paragraph 9.62 – now 9.67) does, however, clarify that <i>‘whilst it is envisaged that there will be limited parking for occupiers, there will be a need for parking to service the accommodation and facilitate changeover.’</i></p> <p>However, further guidance on cycle provision is set out in Government guidance and this should be referred to.</p> <p>Recommended response: proposed change to paragraph 9.62 (now 9.67) of Plan – insert the following sentence after the second sentence – <u>Cycling parking should generally be provided in accordance with the Department for Transport’s ‘Cycle Infrastructure Design’ (Local Transport Note 1/20) or any successor.</u></p>
BHLF-KSAR-N8BD-W	The universities make a positive contribution to Winchester but the potential impact from PBSA on a town of Winchester’s small size and sensitivity must be carefully managed. There should be a clear policy framework to limit PBSA to clearly defined areas.	Comments noted. Student accommodation is not only provided by the Universities, with substantial schemes being developed by independent providers. It is not, therefore, realistic or reasonable to limit

	<p>Policy H9 is too permissive and should be re-drafted to state that: “any applications for additional university facilities or accommodation should be determined against an approved masterplan for each institution in order to fully demonstrate where, when and how development can be successfully accommodated within an overall context. Until masterplans are approved, PBSA should be on a university campus, adjacent to a campus or possibly in the area of Station Approach or the Central Winchester Regeneration area</p> <ul style="list-style-type: none"> • Through a legal agreement with the LPA and implemented at first occupation, which restricts occupation to fulltime students enrolled on courses of one academic year or more; • On-site parking will be restricted to disabled, service and operational parking and is managed to ensure no student parking onsite.” 	<p>provision to that identified by University masterplans, or to siting on University campuses. And purpose built accommodation does relieve pressure on family housing. The policy limits parking provision but there are occasions where this should exceed what is required just for disabled parking.</p> <p>Recommended response: No change</p>
ANON-KSAR-N8NY-X	<p>The policy seems favourable to the higher education institutions and their expansion plans.</p>	<p>Comments noted. The higher education establishments make an important contribution to Winchester and it is appropriate that the Plan should take a favourable approach to such establishments, while imposing necessary controls through policy H9.</p> <p>Recommended response: No change</p>

	Recommendations	Officer response
Comments from SA	None.	NA
Comments from HRA	None.	NA

Policy H9: Purpose Built Student Accommodation

Amendments to explanatory text

9.62 Accordingly, policy H9 promotes the development of purpose-built student accommodation in suitable locations, where there is easy access to the establishments being served by active travel modes or public transport and where this would not be harmful to established residential neighbourhoods. Whilst it is envisaged that there will be limited parking for occupiers, there will be a need for parking to service the accommodation and facilitate changeover. **Cycling parking should generally be provided in accordance with the Department for Transport's 'Cycle Infrastructure Design' (Local Transport Note 1/20) or any successor.** Student accommodation will be resisted in locations which do not meet the criteria of policy H9 and policy H10 provides controls over houses in multiple occupation (HMOs) where necessary.

Amendments to policy

The provision of additional purpose built accommodation to help meet the housing needs of students will be supported, where proposals can demonstrate that the following criteria have been addressed:

- i. The type of student accommodation proposed would meet a need in the locality resulting from a shortfall of existing provision or planned expansion by an academic institution, or would secure the release of family housing from HMO use;
- ii. The location of the accommodation is easily accessible to the establishment it is planned to serve by **existing / proposed** walking, cycling or ~~existing / proposed~~ public transport **routes**;
- iii. Adequate cycle and car parking provision is made within the development, designed to encourage active travel, discourage private car use, and avoid unacceptable increases in on-street parking in the surrounding area;
- iv. Proposals are compatible with, and consider the impact upon the surrounding area in terms of their design, scale, layout, and impact on residential amenity through noise and disturbance;
- v. The proposal is not on a site allocated for other uses, or where there are policies in place to protect the existing uses such as open space, employment or facilities and services;
- vi. Adequate provision is made for recycling and refuse storage / disposal.
- vii. A management plan or other controls will be put in place prior to occupation of any accommodation, to ensure the scheme is occupied and operated as permitted and managed effectively so as to ensure a safe and pleasant living environment for students and the local community.