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Winchester District Local Plan

Winchester City Council Local Plan Examination

**Hearing Statement Matter 10:
Homes for all (policies H5 - H11)**

April 2025



Winchester
City Council

Matter 10 Homes for all (policies H5 – H11)

Issue: Would the housing policies H5-H11 be clear, justified and consistent with national policy and would they be effective?

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Policy H5 meeting housing needs:

1. Would the size mix for market and affordable housing set out in policy H5 be justified by the evidence, particularly the Winchester Strategic Housing Market Assessment (HA01)? Would policy H5 provide appropriate flexibility to meet local evidenced needs? Should it provide further flexibility in relation to other matters such as site and local characteristics?

WCC response:

- 1.1 The latest evidence on the need for different sizes of homes by tenure is set out in the 2024 SHMA Update (Document HA01), in particular in Section 4. This has informed the drafting of Policy H5. The evidence shows a need for a range of different sizes of homes taking account of the existing housing mix, evidence of overcrowding and under-occupation, and demographic trends over the plan period. The analysis for rented affordable housing takes into account information from the Housing Register on need, as well as the profile of lettings (see Table 4.11) which is influenced by current supply and turnover of different property sizes.
- 1.2 The requirement for at least 40% of affordable dwellings for rent to be of 3+ bedrooms is consistent with the recommended mix identified in the SHMA Update (HA01 Table 4.12) and the analysis of relative need set out in Table 4.11 which identifies the greater relative need for these larger properties taking account of the profile of lettings.
- 1.3 In terms of affordable home ownership, the focus of need both in the evidence (see HA01 Table 4.13 and Para 4.32) and in the Council's own experience is on 2- and 3-bed properties, with demand principally arising for these homes from younger families and childless couples. As a home ownership product, 1-bed properties offer little flexibility to take account of households changing circumstances, whilst it is challenging to deliver 4+ bed properties which are affordable to households in the District (see HA02 Para 8.29).
- 1.4 The provision for *at least* 30% of market homes to have 1- or 2- beds is consistent with the SHMA Update Recommendations (HA01 Table 4.14), with the overall focus on family-sized properties implied reflecting market characteristics and the demand profile.
- 1.5 Local evidence of need can be taken into account. This may take the form of parish housing need data available via Hampshire Home Choice. This will detail those applicants for rented housing with a local connection to the parish and the bedroom sizes required as well as the banding priority. Other sources of housing need include housing need surveys, discussing needs with local community groups and surveys carried out for Neighbourhood plans or Parish profiles.

- 1.6 While the SHMA Update provides full evidence and recommendations on the breakdown of dwelling sizes, these are very detailed. The Local Plan policy requirements are more concise and focussed on securing needs that may not otherwise be met by the market. For example, developers are often keen to provide the affordable rented element of a development by means of smaller units, so policy H5i aims to ensure that needs for larger (3 bed or more) dwellings are also met. Conversely, developers frequently seek to secure a larger proportion of larger market dwellings, so policy H5iii seeks to ensure an element of smaller units is achieved.
- 1.7 30% of the Open Market Homes are required for 1- and 2- bedroom homes which allows for a focus on smaller homes whilst also allowing for financial viability. The stipulation of this percentage takes into account both household changes and the ageing of the population.
- 1.8 In the affordable rented sector policy H5 states that at least 40% of the homes are to be of 3 bedrooms. This is included because it is found that affordable rented homes provided through developers tend to be the smaller 1- and 2-bedroom homes in order to reduce cost. This stipulation ensures that a proportion of larger homes are provided and is in line with the recommendations of Table 4.24 in the SHMA. The percentage of 4-bedroom homes is quite low reflecting the fact that they will be more expensive to rent but are required for larger families and can free up smaller homes.
- 1.9 Policy H5 states that at least 65% of affordable home ownership should be 2- and 3-bedroom homes. This percentage ensures that this size of home will be provided, and WCC housing officers have found this to be the most popular and locally most affordable.
- 1.10 A number of representors have argued that the policy provides insufficient flexibility and that the housing mix should take account of the characteristics of the site and local area, or other evidence of local needs. The Council consider that the policy as drafted provides sufficient flexibility as it includes the caveat “unless evidence of local needs or the circumstances of the site justifies an amended approach.” The supporting text in Para 9.32 equally references the potential to have regard to more local localised assessments of need. This accords with the recommendations of the evidence (HA01 Paras 4.36-4.38, and 4.52-4.53).
- 1.11 Many local plans set out in policy specific requirements for percentages of each dwelling size (1-bed, 2-bed etc) and by tenure. Policy H5 as drafted does not do this and sets out minimum requirements to ensure that smaller/larger homes are achieved, as appropriate, where the market would otherwise be unlikely to achieve the needs identified in the evidence. This policy approach builds in additional flexibility.

2. Would policy H5 be effective in meeting demand for well-designed smaller homes?

WCC response:

1.12 Yes. The policy seeks a range of housing types and sizes on sites of ten dwellings or more, and seeks to ensure that 30% of new market dwellings on larger sites are 1 or 2 bedroom homes. 30% of the Open Market Homes are required to be 1- and 2-bedroom homes which allows for a focus on smaller homes whilst also allowing for financial viability. The stipulation of this percentage takes into account both household changes and the ageing of the population. The Plan should be read as a whole and together with other relevant policies in the design chapter it is considered that this policy will be effective in meeting demand for well-designed smaller homes.

3. Would policy H5 requirements for specialist homes be justified by the evidence? Would policy requirements provide appropriate flexibility?

WCC response:

1.13 The principal evidence on need for specialist housing is set out in the SHMA Update (HA01) in Section 5. This updates the analysis in HA02. The analysis provides a quantified need for a range of different types of specialist housing over the plan period in Table 5.7. It shows:

- A strong existing supply of Housing with Support, but with demographic change a modest net need arising for 461 units over the plan period; but the potential need for remodelling/replacement of some existing sheltered housing (See Para 5.39);
- A need in particular for Housing with Care, with a need for 540 units over the plan period; and
- A strong existing supply of residential and nursing care bedspaces, but a need arising for additional provision over the plan period.

1.14 Policy H5 is supportive of the provision of specialist and supported housing in sustainable locations. Policy H5 is seeking to support increased delivery, responding to the need which has been identified – and an important component of doing so is requiring major sites of 50+ dwellings to consider an ‘an element designed and marketed to meet the needs of older persons or other local specialist needs’ which is ‘in line with local needs.’

1.15 A number of representors (have questioned how effective the Policy will be for meeting needs for older persons or other specialist housing, and whether instead the Plan should include a specific supportive policy for supported accommodation (ANON-AQTS-3274-9) or site allocations (ANON-AQTS-32GC-8, ANON-AQTS-32NA-D, ANON-AQTS-32NS-Y). The process for considering potential site allocations is set out in the Development Strategy and Site Selection Topic Paper ([SD10b](#)) which outlines the approach followed and shows how in the case of proposed allocation KW1 Cart and Horses an appropriate site was identified. In the case of a further supportive policy for

older persons and supported housing it is not considered necessary. Policy H5 will supplement the Plan allocations and overall the policy is considered appropriate in meeting older persons housing needs.

- 1.16 The Council has been working proactively, including with partners such as Hampshire County Council, to bring forward specialist housing. It has delivered existing extra care schemes in Winchester; and there is further specialist housing provision which has been secured as part of extant planning consents within key strategic allocations in the District – Kings Barton (Policy W1), North Whiteley (Policy SH2) and Newlands (West of Waterlooville – Policy SH1). In addition, the plan makes a specific allocation for specialist housing at the Cart and Horses site, Kings Worthy (Policy KW2) and is supportive of and references potential provision as part of mixed use schemes in Winchester – such as the Station Approach Regeneration Area (Para 12.90) and University of Winchester/Royal Hampshire County Hospital (Para 12.118).
- 1.17 In addition, there are other sites with extent planning consent, with the AMR (Document ED03b Appendix A3.5) for instance illustrating recent delivery and a pipeline of further schemes to provide 147 C2 care home bedspaces.
- 1.18 Policy H5 incentivises other large sites coming forward to consider provision of specialist and supported housing. This is important in helping to support delivery of specialist housing for a wide range of groups – from older people to those with autism and learning disabilities through to care leavers. It would be appropriate for prospective applicants to engage with the Council’s Housing Team in developing proposals.
- 1.19 The Policy is considered to provide sufficient flexibility to take account of factors affecting delivery on-site such as local needs, market dynamics, management practicalities and viability, as the policy references. Thus, whilst a large strategic site might be expected to provide a specific specialist housing scheme for older people (as key strategic allocations within the Plan are), smaller developments might include provision of a number of supported housing units within the affordable housing offer.
- 1.20 The Strategic Housing Market Assessment (SHMA) evidences the need for specialist homes especially adapted homes, those for Older Persons and Children’s Homes.
- 1.21 The document provides evidence for delivering ‘accessible and adaptable’ homes as defined in Part M4(2) of Building Regulations, subject to viability and site suitability. It also provides evidence for wheelchair housing as stated in policy H5 and differentiates between the Market and Affordable sectors.
- 1.22 The SHMA does provide evidence for Older Persons housing and breaks down the provision by type of provision. Policy H5 does also provide for flexibility in the provision of supported housing by stating that support will be given to well designed schemes that are in “line with local needs, market intelligence and site viability.”

4. What is the justification for the application of the nationally described space standard (NDSS)?

WCC response:

- 1.23 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. Part of that strategy is to ensure that homes have the minimum liveable space required to meet the needs of people over their lifetime.
- 1.24 Evidence on the size and type of dwellings delivered in the Winchester Plan area is set out in Authorities Monitoring Reports. The floorspace of housing development is not recorded, but the most recent monitoring report (ED03a) sets out the net completion of new dwellings by number of bedrooms and that the existing target that a majority of new homes should be 2-3 properties has been met (para. 5.9).
- 1.25 The Employment Land Study (July 2024) (VE08) considers the prevalence and anticipated trends for homeworking in the Winchester Plan area. It shows that levels of homeworking were higher in Winchester compared to the national average before the pandemic (para. 3.5.27). Although there has been a “return to the office” since the pandemic, hybrid working patterns are entrenched (para. 3.6.38) and expected to remain. This conclusion is correlated by the findings of the Hampshire Home Movers Survey 2023 (HA05), which found “*space to work from home within properties may also now be an important factor*” for home movers in Hampshire (para. 6.8).
- 1.26 The 2020 Strategic Housing Market Assessment (HA02) and 2024 Update (HA01) highlight the various needs for specialist housing, and note that Winchester has a relatively older population than the Hampshire, regional and national average (Table 5.1).
- 1.27 It is therefore considered that the prevalence and increasing occurrence of working from home, and the relatively older population of Winchester, provide local justification for the introduction of the NDSS, alongside the more general aims of securing quality housing with its associated benefits for mental and physical health.

5. What is the evidence that the Council has considered the impact of using the NDSS, in terms of Plan viability and any effects on the affordability of new homes?

WCC response:

- 1.28 The Local Plan Viability Report (July 2024) (LPV01) sets out at paragraph 3.22 (page 12) the dwelling size assumptions applied within the testing and those reflect the application of the NDSS. This is also referenced within Appendix 1 to the July 2024 (LPV02) and August 2024 report (LPV05). Overall, we consider

the application of NDSS does not threaten the ability of sites to come forward viably.

1.29 It is not considered there is compelling evidence that ensuring the nationally described space standards are achieved in new dwellings will have a measurable impact on the affordability of new homes.

6. What is the justification for the application of the optional requirements for M4(2) accessible and adaptable dwellings and M4(3)(2)(a) wheelchair user dwellings?

WCC response:

1.30 Paragraph 5 of the PPG (Ref ID:56-005-20150327) states that LPAs should take account of evidence that demonstrates a clear need for housing with specific needs and plan to meet these needs. The PPG sets out types of data which can be considered (there is a wide range of evidence to draw from, and the PPG makes reference to including the likely future need for housing for disabled people, accessibility and adaptability of existing housing stock.

1.31 The justification for seeking compliance with M4(2) standards in the Building Regulations is based on the evidence of need in the SHMA and SHMA Update (HA02 and HA01). The SHMA Update showed that 28.5% of households in the District in 2021 included someone with a disability (Table 5.4), with higher levels amongst older households. It indicates that the population aged 65+ is expected to grow substantially over the plan period by around 12,000 people (Table 5.3), and models that this can be expected to drive an increase in those with mobility problems or impaired mobility (Table 5.5), with the population with mobility problems increasing to almost 6,800 at the end of the plan period. The needs evidence thus clearly justifies provision of new homes to M4(2) accessible and adaptable homes standards, which facilitate the design of homes which can be adapted to households changing needs rather than requiring them to move. Nationally just 7% of existing homes meet these standards.

1.32 National Government has confirmed its intention to raise the minimum standard for all homes to M4(2) following consultation in July 2022, but this has yet to be implemented (see HA01 Paras 5.50 – 5.51). Therefore, there is a need for the Local Plan policy to support M4(2) delivery in the interim. The Council's adopted Local Plan, through Policy DM2, already requires this for affordable dwellings.

1.33 Policy H5 requires 5% of market homes to be delivered to M4(3)(2)(a) wheelchair adaptable standards; and 10% of affordable homes to M4(3)(2)(b) wheelchair accessible standards, on sites of 10 or more homes.

1.34 The evidence for M4(3) wheelchair user dwellings is set out in the SHMA Update (HO1) in the section starting at Para 5.41. Table 5.9 therein shows an estimated 1,200 wheelchair users in the District in 2020 (rounded), which is expected to rise to 1,650 in 2040. Having regard to the suitability of existing

homes, it calculates that there is a need for provision of 413 wheelchair-user homes over the period to 2040 (Table 5.10). Table 5.11 therein shows that the incidence of wheelchair users is much greater in the affordable housing sector (7.1%) than market housing (1.2-3.1%). This is reflected in the different policy requirements for market and affordable housing. The application of the higher M4(3)(2)(b) standards for affordable homes recognises that the Council only has the right to request such provision on homes for which it has nominations rights, as set out in the *Optional Technical Standards* guidance.

1.35 The Council has included provision for compliance with these policy requirements in the modelling undertaken in the Viability Study (LVP01), and they have therefore informed the policy approach taken in other areas, such as affordable housing. The Study indicates that compliance with M4(2) standards represents an uplift in build costs of less than 1% (2024 Local Plan Viability Report Appendix 1, LVP02). Whilst the costs of provision are higher for M4(3) wheelchair-accessible dwellings, these are applicable to a much lower proportion of dwellings, and have also been taken into account in the viability evidence. The costs of M4(3) compliance are based on those identified in the Government's consultation on *Raising accessibility standards for new homes*.

1.36 The Council already has experience of securing wheelchair adaptable homes. Adopted Local Plan Part 2 policy DM2 requires affordable dwellings to, where practical and viable, be constructed to Part M4 Category 2, and larger schemes such as Kings Barton, North Whiteley and Newlands all have wheelchair accessible homes secured via Legal Agreement.

7. Would policy H5 be effective in enabling the Council to meet its statutory duty in relation to considering the needs of those wishing to build their own homes? Would those requirements be justified by robust evidence?

WCC Response:

1.37 Yes. The Council has considered the requirements of self and custom build housing. The Strategic Housing Market Assessment ([HA02](#)) considered the demand for self and custom build housing (para. 9.27 to 9.52) and recommended that the Council should develop a flexible planning policy to support the self-build and custom housebuilding sector on both small sites and larger strategic sites within the District; and encourage the submission of sites suitable for self-build and custom housebuilding through the Call for Sites process.

1.38 Since the publication of the SHMA the Council has reviewed how it records demand for self and custom housing through the Self Build register, and reports this through the Authorities Monitoring Reports and data returns to Ministry Housing Community Local Government. An issue was identified regarding the historic recording of need in the register. The outcomes of this are that as at 30 October 2024, the Council has recorded permissions for 240 self and custom build dwellings against a total need of 407 recorded on part 1 of the register,

and 64 on part 2 (those who did not pass the local connection test introduced in 2019). Full details are set out in the Self Build Position Statement January 2025 ([ED10](#)).

- 1.39 The Position Statement shows that the rate of new entries on the register has decreased in recent years, possibly as the limitations of what joining the register can achieve are better understood, and the rate of permissions has slightly increased, possibly due to the weight given to the benefits of meeting the shortfall in self and custom build housing, and the advantages in securing an exemption from the requirement to demonstrate biodiversity net gain, provide CIL, etc. However, whilst the Council has three years to deliver the need in Part 1 of the register, it is clear that the rate of permissions, while increasing in recent years, is not sufficient to meet demand over the plan period, and the Plan should also consider the need identified in Part 2 of the register.
- 1.40 In response, the Plan seeks larger sites of 50 units or more, where suitable, to offer a number of plots for self build. 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. A threshold of 50 units, and marketing period of twelve months, were considered appropriate to enable sites to be completed in a timely manner while providing the opportunity for plots to be secured for self build. A proportion of 6% of units was chosen to provide for a meaningful contribution, given the overall need, without impacting upon other policy aims such as the tenure split and size of dwelling were not unduly impacted. This policy was included in the viability evidence prepared by the Council's viability consultants as set out in Local Plan Viability Report Appendix 1- Assumptions Summary ([LPV02](#)). Whilst some parties have objected to this policy, other developers have supported it given the provision for the plots to "fall back" into the remaining provision should marketing demonstrate there is no demand on any given site.
- 1.41 The policy recognises that not all sites (for instance, town centre regeneration sites likely to be flats) are suitable for custom and self build housing. The likely yield of plots over the plan period for the operation of proposed Policy H5 is set out in Appendix 1 of this document. In total, the assumption is that 153 additional plots suitable for self and custom build housing on suitable sites will be permitted as a result of proposed Policy H5.
- 1.42 The total future demand and supply of self build plots is set out in Appendix 2 to this document. The shortfall as at 30 October 2024 of 231 units will be reduced by a mixture of windfall and contribution from larger sites as a result of Policy H5. Appendix 2 sets out three scenarios regarding windfall. The scenario considered most likely and appropriate for considering the Plan is Scenario B, which considers the total need in Parts 1 and 2 of the register, and projects forward the rates of demand and supply recorded in the past three years. The past three years is considered more likely to be indicative of what will happen in the future, given the likely increase in windfall due to the current shortfall and the new incentive of securing an exemption from Biodiversity Net

Gain, etc, as well as a greater understanding on the part of those who may be considering joining the register that entry on the register has limited advantages.

1.43 Therefore, the proposed policy H5 is expected to deliver sufficient additional plots on suitable sites to supplement anticipated windfall to meet the demand recorded on the self build register over the Plan period.

1.44 As an alternative or additional action to boost the supply of self and custom build housing, some respondents have suggested that the Plan could have introduced a new policy providing for self build developments outside of the settlement boundaries, that meet certain criteria such as relative accessibility and landscape impacts. This option has not been proceeded with. Successive development plans for Winchester have included a form of exceptions policy for rural affordable housing, broadly similar to that set out in proposed policy H7. That approach has secured the completion of 105 additional affordable homes on sites outside of the settlement boundaries since 2013 on schemes set out in appendix 3 to this document. A new exceptions policy along similar lines for self and custom build housing would jeopardise future delivery of the affordable housing exceptions policy, due to increased hope value accruing to sites considered likely to gain permission under such an approach. Given the substantially higher demand for affordable housing in the district this approach is not considered appropriate and has not been proceeded with.

Policy H6 Affordable housing:

1. Would policy H6 strike the right balance between the requirement for provision of affordable housing to help meet local needs and the delivery of the homes required within the Plan period, given other Plan policy requirements?

WCC response:

1.45 Yes. The production of the Plan has been informed by viability evidence which has indicated where there are concerns regarding the costs of local plan policies and whether they can be delivered. This has informed the decision to base the requirements of Policy H6 on affordable rent, as social rent is likely to have a negative impact upon the viable delivery of sites, or result in a reduction of the number of affordable homes delivered through this policy. The local plan viability work has assessed in full the costs of development, including all policy costs, and these are set out in the document Local Plan Viability Report ([LPV05](#)). In view of this, it is considered that Policy H6 does strike the right balance in meeting local needs and delivering the homes required.

2. Given the lower affordable housing requirements in relation to previously developed land and the requirements of policy H2, which prioritises that land, what is the robust evidence to justify this approach?

WCC response:

- 1.46 The lower affordable housing requirements on previously developed land arose through the local plan viability testing. This is outlined in paragraphs 4.5 and 4.6 of the Local Plan Viability – Interim Stage 1 Report (October 2022) ([LPV13](#)). This outlines how the initial testing 40% affordable housing across the plan area “could be met in some circumstances but would need to be varied” (para. 4.5). In recognition of the additional costs of developing brownfield sites, the requirements for affordable housing are reduced by 10% in the case of previously developed land.
- 1.47 Reducing the affordable housing requirements for brownfield land has a number of benefits. First, it ensures that the policy costs, such as affordable housing are viable and deliverable. It also assists brownfield sites to come forward for redevelopment, and the policy provides further reassurance that the total amount of development envisaged to come forward on both allocated and windfall sites is delivered. Therefore, reducing the requirements for affordable housing on previously developed land is an important measure in providing confidence that Policy H2 is robust and deliverable.

3. What is the robust evidence to justify policy H6’s affordable housing requirements?

WCC response:

- 1.48 Policy H6 requires affordable housing provision on sites of over 10 dwellings/ 0.5 ha with a 30% minimum requirement on previously developed land and 40% on other sites. It provides for a 5 percentage point reduction to this in the short-term where development is required to mitigate the impact of additional phosphates in the River Itchen SAC, and provision for open-book viability assessment where site specific factors mean that policy compliant provision cannot be achieved. The supporting evidence includes both evidence of affordable housing needs (Document [HA01](#)) and viability (Document [LPV01](#)).
- 1.49 The SHMA Update (HA01) shows a considerable need for rented affordable homes, with an annual need for 368 rented affordable homes in the plan area (Table 3.11); together with a need for up to 147 affordable home ownership dwellings a year (Table 3.19).
- 1.50 The Council has had regard to both the needs and viability evidence in setting the policy requirements, including the tenure split which seeks 65% rented affordable housing (social rents or affordable rents) and 35% low cost home ownership. This is set out in Para 9.40 in the supporting text.

1.51 The conclusions of the Viability Study are set out in Para 4.11 and the Policy accords with this. The lower policy requirement for previously developed sites reflects typically higher development costs and the plan's aspiration to maximise the redevelopment of PDL. Policy NE16 requires overnight development to mitigate the impacts of nitrogen, as well as phosphorus in the River Itchen catchment. These have been taken into account in the viability evidence, and the Policy set out a lower affordable housing requirement in the short-term in the River Itchen catchment to take account in particular the notably higher mitigation costs in this area, in advance of strategic mitigation solutions coming forwards.

4. Would the Plan's approach to first homes/low costs homes be justified by robust evidence? Would it accord with national policy?

WCC response:

1.52 The Plan was submitted in November 2024 and is therefore to be assessed against December 2023 NPPF, which included a requirement in Para 66 for policies to seek at least 10% of homes for affordable home ownership (subject to a number of exemptions). It makes reference in Para 6 to the May 2021 Written Ministerial Statement which contained the previous Government's policy on First Homes.

1.53 As set out in Para 9.41 of the supporting text, the 2024 SHMA Update (Document HA01) the Plan seeks a flexible approach to the provision of low cost home ownership housing without being specific about the requirement for First Homes. The SHMA Update found that it would be very difficult to make First Homes genuinely affordable in the District and would focus on a narrow market for smaller properties. It concluded that the local evidence did not support the then national policy position, that requiring 25% of affordable homes as First Homes would squeeze out other forms of affordable provision which cater for a wider range of needs and would prejudice the delivery of much needed rental provision (Para 3.93). It recommended that low cost home ownership would be better focused on shared ownership and rent to buy (Para 3.94).

1.54 The 2024 Viability Study (LPV01) similarly confirmed that the price cap for First Homes would likely limit the provision of First Homes to smaller properties, or if the discount was set at a higher level would have a downward effect on viability compared to other forms of affordable home ownership.

1.55 Having regard to the evidence base, the evolution of national policies which are a material consideration, and the Council's experience that proposals for First Homes on development sites in the District are not being brought forward by developers (as referenced in Para 9.41 of the supporting text), the Council considers that the policy approach of allowing greater flexibility to provide a broader range of affordable home ownership products is both justified, sensible and will help support affordable housing delivery.

5. Would policy H6's requirements accord with NPPF paragraph 66? Would it provide clarity as to what types of development would trigger the policy?

WCC response:

1.56 NPPF Paragraph 66 requires major development to include 10% of the total number of homes to be available for affordable home ownership. Policy H6 requires 35% of affordable dwellings to be low cost home ownership. The overall provision of affordable home ownership will differ from site to site depending upon how much overall affordable housing a site is expected to deliver, depending upon its circumstances (i.e. if it is on previously developed land or falls within an area affected by phosphorus). Under policy H6, a greenfield site of 100 homes not affected by phosphorus would be expected to deliver 14 homes for affordable home ownership, (100x40%x35%), whereas a brownfield site affected by phosphorus would be expected to deliver 9 homes for affordable home ownership (100x25%x35%). Whilst this means not all sites quite deliver the 10% set out in para. 66 of the NPPF, it reflects the overall need for affordable home ownership outlined in the SHMA update but prevents affordable home ownership having an undue prevalence in the housing mix in areas such as Winchester, which are predominately brownfield and affected by phosphorus.

6. Would policy H6's required tenure split for market led housing schemes be effective in meeting community requirements? Would further flexibility be required to ensure the breakdown relates to the most recent evidence of need?

WCC response:

1.57 The SHMA Update (HA01) recommended a tenure split of 75% rented, 25% affordable home ownership, which closely reflected the profile of need shown but also the national policy requirement in the 2023 NPPF for 10% of affordable housing for affordable home ownership, assuming a 40% affordable housing requirement in Policy.

1.58 However, in drafting the Policy, the Council has also had to have regard to the viability evidence (LVP01). This has shown some circumstances in which 40% affordable housing provision is not viable, and therefore with a view both to maximising overall affordable housing provision and aligning with the 2023 NPPF requirement for affordable home ownership, it adjusted the tenure split to support 65% social or affordable rent and 35% low cost home ownership.

1.59 The Policy thus brings together evidence on need, viability and policy priorities. It is necessary for the policy to clearly set out the tenure split expected to accord with Para 64 in the 2023 NPPF.

1.60 Policy H6 provides for the consideration of viability evidence on an ‘open book’ basis where policy compliant affordable housing provision cannot be viably achieved, and it is common as part of such discussions to consider adjustments to the tenure split of affordable housing to support viability to achieve the ‘maximum viable level of affordable housing’ that the policy requires. The Council considers that the sufficient flexibility is therefore provided by the policy to take account of site specific circumstances.

1.61 More recent evidence of need would evidently be a material consideration in the application of the policy, and consideration of it in applying the policy is provided for in Para 9.42 of the supporting text. However, amendments to the policy wording itself are not considered necessary for soundness.

7. Would the policy’s approach to the cost uncertainty of nitrate and phosphate mitigation as set out in policy H6 and paragraph 9.49 be justified and effective? Would the policy wording in this regard be clear and unambiguous, in particular reference to ‘...costs reducing significantly...’?

WCC response:

1.62 It is known that the costs of nutrient mitigation will fall after 2030, following the introduction of Best Available Technology at Waste Water Treatment Works. This is particularly important for phosphorus, which is a more expensive issue to mitigate.

1.63 The Local Plan seeks to provide scope for the reduction in affordable housing requirements to be kept under review, given that the viability work has demonstrated that without the increased cost of phosphorus mitigation, higher affordable housing rates (40% greenfield, 30% brownfield) are viable. The text of the Plan has evolved as the document has progressed, with the aim of securing this review while giving certainty to all parties.

1.64 While it is still not possible to quantify the reduction in mitigation costs after 2030, it is thought most likely that it will be this change (to Best Available Technology) that will result in the “significant” reduction in mitigation costs envisaged by the policy. Therefore, it is proposed for a further proposed change to the supporting text to make this clear, and will provide all parties with further certainty on how the expected change in mitigation costs will be addressed by the Council.

1.65 Proposed Modification (PMXX) –

Revise paragraph 9.49 as follows –

The Government has recently announced measures which are intended to support the delivery of strategic mitigation solutions, and reduce the impact of new development on the quality of the water environment in the first place by 2030, but the impact of these in relation to development viability are not yet known so cannot be quantified at the present time. Given this uncertainty it is

considered appropriate that agreements to secure affordable housing include measures to secure further contributions to affordable housing should those costs reduce significantly following introduction of Best Available Technology at Waste Water Treatment works in 2030. Any significant changes relating to the affordability of mitigation will be reported in the Authority Monitoring Report. ~~Further iterations of this Plan will reflect additional experience and understanding of development viability, including mitigating the impacts of phosphorus and reductions in sustainable construction costs, and therefore how this impacts on the costs of development in the affected area~~

Policy H7 Affordable housing exception sites to meet local needs:

1. Would policy H7i in requiring ‘...proposals to meet an identified local housing need ... within the settlement to which that need relates...’ provide adequate flexibility to meet local affordable housing needs?

WCC response:

1.66 It is considered further flexibility is required. For instance, a very modest scheme may only be justified with reference to need in more than one settlement in the area. Proposed Modification PM63 seeks to amend the policy to make this clear.

2. Would the favourable support for proposals that are community driven or have gained the support of the community be appropriate and effective in meeting policy aims?

WCC response:

1.67 Paragraph 82 of the NPPF states that policies should be responsive to local circumstances and support housing development that reflect local needs. This matter was considered further in paragraphs 9.53 to 9.67 of the SHMA which assessed the performance of the adopted local plan policy CP4 in bringing forward such schemes.

1.68 Community proposals are largely driven by parish councils although Community Land Trusts are beginning to come forward. At present community driven proposals are not in a position to fulfil all the requirements of the Local Plan but they are appropriate and effective for local areas. The reference to community support is to provide more flexibility / schemes, not less, as it gives additional weight to those with support.

1.69 Overall it is considered appropriate for the Plan policy to emphasis the role community support has in bringing forward these schemes and provide additional flexibility to permit those which can demonstrate community support.

Policy H8 Small dwellings in the countryside

1. What is the robust evidence to justify the definition of smaller dwellings in the countryside and the 25% extension threshold?

WCC response:

1.70 The policy sets a threshold of 120 sq.m to define smaller dwellings. This has been brought forward from adopted Local Plan Part 2 Policy DM3 and represents a continuation of that approach. This can be considered quite generous. Using the technical housing standards - the nationally described space standard as a guide, 120 sq.m is broadly indicative of a 4 or 5 bedroom property. Nonetheless, it is considered a reasonable starting point to ensure there remains a diversity of housing stock in the countryside, given that there are limited opportunities to provide additional dwellings.

2. Would policy H8 be clear and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

1.71 It is considered that Policy H8 is clear and unambiguous. The aim of retaining a stock of smaller properties in the countryside is valid as a large proportion of the district is rural. The Policy is a continuation of that set out in Policy DM3 of the adopted Local Plan Part 2. The operation of this policy since 2017 has not shown any significant concerns regarding its clarity and it is considered that the supporting text sets out clearly how points of detail such as outbuildings will be addressed.

Policy H9 Purpose built student accommodation (PBSA)

1. Would policy H9 provide appropriate clarity to direct PBSA to acceptable locations? Would requirements in relation to cycle and car parking be clear and unambiguous? Would they accord with the Plan's transport policies, in particular T1 and T2?

WCC response:

1.72 Yes. It is considered that criteria i to v of Policy H9 do provide an appropriate framework to direct PBSA to acceptable locations. The Student Accommodation Topic Paper ([SD10i](#)) sets out the current position regarding higher education. There are currently three establishments in the Winchester plan area that provide higher education and generate a need for residential

accommodation. As outlined in the Topic Paper, these organisations have plans for future growth but these are subject to change. For that reason, it is considered appropriate for the Plan to set out a criteria based approach to considering what locations may be suitable for PBSA.

1.73 In addition, policy W11 specifically promotes development to ‘consolidate, expand and improve academic provision’ in the vicinity of Winchester University, which is one of the key educational establishments in Winchester that is expected over the Plan-period to have future accommodation needs.

1.74 The requirements in relation to cycle and car parking are similar to the general approach taken in the Plan. No standards are set but the Plan sets out an approach to follow when considering these matters. Overall, the approach is considered to be in line with Policies T1 and T2 but with an appropriate emphasis on discouraging private car use given the occupiers and use of this accommodation.

2. Would policy H9v strike the right balance between providing for PBSA and protecting the District’s local distinctiveness and the delivery of planned growth within the Plan period?

WCC response:

1.75 It is considered that criterion v of Policy H9 is necessary to ensure that the other aims of the Plan, including the retention of employment land and open space, are achieved.

Policy H10 Houses in multiple occupation

1. What is the robust evidence to justify the requirements of policy H10i?

WCC response:

1.76 Policy H10i sets thresholds for the over concentration of HMOs in any one street (25%) or across a designated area as a whole (20%). These thresholds have been set to retain a balanced housing stock and prevent the dominance of one type of housing in any street or area. The threshold was developed as part of Local Plan Part 2 adopted in 2017. At that time an Article 4 direction had been brought into force at Stanmore and the overall 20% threshold was understood to be the position “on the ground” in that area, as set out in paragraph 2.5 of the report to the Members of Cabinet at their meeting of 14

January 2015¹ which approved the Article 4 direction. The Local Plan Part 2 followed that approach, adopting 20% as a threshold for ensuring balanced housing markets and communities.

1.77 Since then, the Council has continued to apply these thresholds in operating adopted Local Plan Part 2 Policy WIN9 and it has proved to be effective. It is recognised that the thresholds used in such policies are often a matter of judgement, but to date this approach has managed to prevent the over concentration of HMOs in certain areas, but has enabled permission to be granted where it accords with the policy, such as in the recent decisions listed on page 28 of the 2023/24 AMR (ED03a).

2. Would policy H10 be clear and unambiguous, so it is evident how a decision maker should react to development proposals?

WCC response:

1.78 It is considered that Policy H10 is clear and unambiguous. The aim of retaining a balanced housing stock, without an over concentration of HMOS is clearly expressed and, subject to the proposed modification PM63 set out in the following answer, the policy is considered sound. The policy is based upon the adopted Local Plan policy WIN9 which the Council has found to be appropriate in determining planning applications since its inclusion in the adopted Local Plan Part 2, with recent decisions listed on page 28 of the 2023/24 AMR ([ED03a](#)).

3. Given the Plan's heritage policies would policy H10, appropriately address the historic environment?

WCC response:

1.79 The plan must be read as a whole and the plan includes detailed policies on both design and heritage, which would also apply. In particular Policy HE1 states that in terms of both designated and non-designated heritage assets that : *'...requires all applications which affect or may affect heritage assets should be accompanied by a Heritage Statement, proportionate to the nature of the development and heritage interest, describing the significance of affected heritage assets and/or their settings, the degree and nature of impact upon that significance and how the proposals minimise or mitigate any harm'*. It is expected that this requirement would reflect such matters as local distinctiveness.

1.80 In addition, in response to representations and post consultation comments from Historic England the council has prepared the following proposed

¹ Available on the Council's website at <https://democracy.winchester.gov.uk/CeListDocuments.aspx?CommitteeId=136&MeetingId=531&DF=14%2f01%2f2015&Ver=2>

modification, which also reinforces the reference to local distinctiveness and historic environment.

- 1.81 PM63: Amend criterion iii of Policy H10 as follows – Would not be detrimental to the amenities of nearby residents, or the overall character and amenity of the surrounding area **or the heritage significance of the building;**

Policy H11 Housing for essential rural workers

- 1. Would the policy serve a clear purpose and would it be clear and unambiguous, so it is evident how a decision maker should react to development proposals? In particular would the requirements in relation to temporary agricultural dwellings and the requirement for ‘...a review of needs of the holding...’ be clear and unambiguous?**

WCC response:

- 1.82 The council considers that the policy is clear and unambiguous as it breaks down all elements that are necessary for the consideration of proposals for essential workers dwelling. The basis of the policy is that such uses are an exception to the normal restrictions that apply to residential development in a countryside/rural location. It is therefore pertinent for the council to ensure all relevant matters are taken into account prior to the grant of a planning permission. Hence the focus on an initial temporary permission, pending a review of the needs of the holding, prior to the grant of a permanent consent. This accords with para 84 a) of NPPF 2023. The supporting text focuses on the functional need of the business, so it is clear to applicants this is about supporting rural enterprises rather than rural dwellings.

- 2. Given the Plan’s heritage policies, would policy H11, in setting out requirements for the design of dwellings to reflect local distinctiveness appropriately address the historic environment?**

WCC response:

- 1.83 The plan must be read as a whole and therefore the plan includes detailed policies on both design and heritage, which would also apply. In particular Policy HE1 states that in terms of both designated and non-designated heritage assets that : ‘...requires all applications which affect or may affect heritage assets should be accompanied by a Heritage Statement, proportionate to the nature of the development and heritage interest, describing the significance of affected heritage assets and/or their settings, the degree and nature of impact upon that significance and how the proposals minimise or mitigate any harm’. It is

expected that this requirement would reflect such matters as local distinctiveness.

- 1.84 In addition, in response to representations and post consultation comments from Historic England the council has prepared the following proposed modification, which also reinforces the reference to local distinctiveness and historic environment.
- 1.85 PM64: Amend second paragraph of Policy H11 as follows – The design of the dwelling should reflect local distinctiveness and the rural character of its surroundings, while avoiding or mitigating adverse effects on the natural **or historic** environment and biodiversity.

Appendix 1 – Anticipated yield of self build plots from policy H5

Local Plan allocation	Total dwellings	Anticipated no of self build plots	Comment
W1	706	42	Phase 4 (706 dwellings) does not have reserved matters approval and has potential to include self build
W2	900	54	Site considered suitable for self and custom build
W3	30	0	Site falls below the policy threshold of 50 dwellings
W4	150	9	Site considered suitable for self and custom build
W5	0	0	Not a residential allocation
W6	0	0	Not a residential allocation
W7	300	0	City centre regeneration site not expected to be suitable for self build
W8	250	0	City centre regeneration site not expected to be suitable for self build
W9	30	0	Site falls below the policy threshold of 50 dwellings
W10	0	0	Not a residential allocation
W11	0	0	Not a residential allocation
SH1	300	18	Self build will be sought from the additional 300 dwellings proposed to be allocated (NB proposed modification to 350 homes would have a consequential uplift)
SH2	210	13	Reserved matters for remaining phase of 100 dwellings anticipated later this year. One additional parcel (SHLEAA sites CU34, CU44 and CU45) has an estimated capacity of 110 dwellings
SH3	30	0	Site falls below the policy threshold of 50 dwellings
SH4	0	0	Not a residential allocation
SH6	0	0	Not a residential allocation
BW1	0	0	Site built out 2024/2025
BW3	10	0	Site falls below the policy threshold of 50 dwellings
BW4	100	6	Site considered suitable for self and custom build
NA1	0	0	Permission granted and site underway

Local Plan allocation	Total dwellings	Anticipate d no of self build plots	Comment
NA2	0	0	Outline permission granted
NA3	100	0	Neighbourhood Plan requirement - not known if any allocations will exceed policy threshold of 50 dwellings
CC1	48	0	Site falls below the policy threshold of 50 dwellings
CC2	45	0	Site falls below the policy threshold of 50 dwellings
CC3	35	0	Site falls below the policy threshold of 50 dwellings
CC4	10	0	Site falls below the policy threshold of 50 dwellings
DEN1	100	0	Neighbourhood Plan requirement - not known if any allocations will exceed policy threshold of 50 dwellings
KW1	45	0	Site falls below the policy threshold of 50 dwellings
KW2	75	0	Mixed older persons housing development. Not anticipated C3 units would exceed policy threshold of 50 dwellings
SW1	36	0	Site falls below the policy threshold of 50 dwellings
WK1	0	0	Permission granted and site underway
WK3	0	0	Allocation for open space
WK5	40	0	Site falls below the policy threshold of 50 dwellings
WK6	60	4	Site considered suitable for self and custom build
KN1	200	0	Expected that Planning Permission will be issued before Plan adopted.
HU1	20	0	Site falls below the policy threshold of 50 dwellings
OTO1	55	3	Site considered suitable for self and custom build
SWO1	40	0	Site falls below the policy threshold of 50 dwellings
SU01	60	4	Site considered suitable for self and custom build
WC1	80	0	Planning Permission granted
Total		153	

Appendix 2 – Self and Custom Build Supply and Demand to 2040

Self build register as at 30 October 2024. A local connection test was introduced in 2019. Since that date, any new applicants who fail the test are placed on Part 2 of the register.

Demand	Part 1	Part 2	Total for Plan-making
30 October 2016 (Base Period 1)	36		36
30 October 2017 (Base Period 2)	53		53
30 October 2018 (Base Period 3)	46		46
30 October 2019 (Base Period 4)	72	11	83
30 October 2020 (Base Period 5)	65	18	83
30 October 2021 (Base Period 6)	57	19	76
30 October 2022 (Base Period 7)	40	8	48
30 October 2023 (Base Period 8)	17	5	22
30 October 2024 (Base Period 9)	21	3	24
Total	407	64	471

Average new entries Parts 1 and 2 for period 2016 – 2024 - **52**

Average new entries Parts 1 and 2 for past three years - **31**

Average new entries Parts 1 and 2 for past three years - **26**

Supply	Permissions
30 October 2016 (Base Period 1)	10
30 October 2017 (Base Period 2)	22
30 October 2018 (Base Period 3)	20
30 October 2019 (Base Period 4)	26
30 October 2020 (Base Period 5)	36
30 October 2021 (Base Period 6)	26
30 October 2022 (Base Period 7)	40
30 October 2023 (Base Period 8)	22
30 October 2024 (Base Period 9)	38
Total	240

Average Permissions for period 2016-2024 - **27**

Average Permissions for past three years – **33**

Shortfall as at 31 October 2024 – **231**

Self build yield – Projections to end of Plan Period

Shortfall as at 30 October 2024	231
Anticipated Yield from Policy H5	153
Remainder	78

Windfall assumptions

Scenario	A	B	C
Remaining Shortfall	78	78	78
Demand - 13 years to 30 October 2039	676	403	338
Supply - 15 years to 30 October 2039	405	495	495
Position by end of Plan period	-349	14	79

Description

A - average demand of parts 1 and 2 and average supply 2016-2024

B - average demand for the past three years on Parts 1 and 2 of the register, and supply for the past three years

C - average demand for Part 1 of the register, and supply for the past three years

Appendix 3 – Rural Affordable Exception Schemes

Recorded completions as per Authority Monitoring Reports

Year	Scheme	Total completions
2013-2014	Hook Pit Farm	25
	Rook Lane Micheldever	15
2017-2018	Site 1A and 1B, Land off Hillier Way, Winchester	13
	Ludwells Farm, LA Lower Chase Road	13
2018-2019	Land West of Beggars Drove, Sutton Scotney	15
	LA Heathlands, Shedfield	13
	Land at Hinton Field, Lovedean Lane, Kings Worthy	11
Total rural exceptions affordable housing since 2013		105