

Examination of the Winchester District Local Plan 2020-2040 (the submitted Plan/the Plan)

Winchester College – Hearing Statement

Matter 10 – Homes for All (Policies H5-H11)

Regulation 19 consultation reference number: BHLF-AQTS-328K-1

As set out in Document ED17:

- Policy H9: Purpose Built Student Accommodation (PBSA)

Question 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?

Draft Policy H9 appears to have been drafted to meet the needs of universities rather than boarding schools such as Winchester College. Whilst in the main these criteria are compatible with both types of student accommodation, recognition is specifically required in relation to the location of student accommodation for boarding schools where the choice of location will frequently be dictated by the land available within the boarding school estate. This may inevitably result in the need to repurpose existing land or buildings which could result in a loss of open space, employment or facilities and services, which would be contrary to policy. These same locational constraints do not apply to university accommodation which can be located some distance from the main academic facilities.

The issues around parking and anti-social behaviour that the policy is seeking to control are more relevant to university accommodation than that associated with boarding schools. There would be no requirement for a management plan to control the occupation and operation of a boarding house as this would be undertaken by the school in line with their management practices and safeguarding duties.

The draft policy seeks to ensure adequate cycle and car parking provision is made, which is open to interpretation and therefore not clear and unambiguous. If the policy is to be amended, it needs to be drafted to reflect the fact that student accommodation for boarding schools will have different parking requirements than that associated with universities given that pupils in the main do not drive and the requirement to travel outside the school estate will be minimal.

Draft Policy T1 requires that development that would increase travel must be supported by a transport assessment to quantify the amount and type of travel. Whilst this requirement is not inconsistent with draft Policy H9, it is unnecessary in respect of PBSA for boarding schools given that the additional trips generated would be minimal. Draft Policy T1 should not apply to any development that would increase travel but rather only those that would generate significant amounts of movements as set out in Planning Practice Guidance (Paragraph: 002 Reference ID: 42-002-20140306).

It is not clear how PBSA would be considered in the context of draft Policy T2 as it is both a commercial use and residential development; further clarification is required. As a Transport Assessment and Travel Plan are only required for development that generate significant amounts of movements, their production should not be a requirement for all development.

Part (iv) of draft Policy T2 requires the provision of secure parking for mobility scooters among other things. Again this should not be a requirement for all development as it is unlikely to be required for PBSA. It should be at the educational establishment's discretion to provide such facilities if the need arises.

Question 2: Would policy H9 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?

Policy H9v requires that the proposal for PBSA 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.

The choice of location for PBSA will frequently be dictated by the land available within the boarding school estate. This may inevitably result in the need to repurpose existing land which could result in a loss of open space, employment or facilities and services, which would be contrary to policy. Where open space, facilities and services are not open to the public, they should not carry the same weight as those that are.

The reference to employment needs to be clarified, as it is not clear whether all of the land within the Winchester College campus would be considered to be employment land given the College's status as a major employer in the city, or whether the policy is aimed at purpose built commercial units.