

Interim Position Statement of Student Accommodation in Winchester to inform Local Plan 2036

1. Introduction

- 1.1 This paper sets out matters to be considered through the preparation of Local Plan 2036 in relation to the provision of student accommodation in Winchester.
- 1.2 Over recent years the amount of student accommodation has increased through both the provision of purpose built halls of residence and changes from standard houses to houses in multiple occupation (HMOs).
- 1.3 The following sections set out in brief; recent planning policy response to student accommodation through Local Plan Part 2 adopted in April 2017 and identifies matters to be considered further through the preparation of Local Plan 2036.

2. Background

- 2.1 The Council introduced Policy WIN9 through Local Plan Part 2, in response to increasing concern about the effect of HMO accommodation in Winchester and its impact on the provision of family housing, particularly in Stanmore where at the time the Council was pursuing the option of introducing an Article 4 Direction (now made and confirmed) to remove permitted development rights which allowed the creation of new HMO's without needing planning permission from the Council. Since then the issue of student accommodation has been raised on a number of occasions resulting in the introduction of another Article 4 Direction at Winnall. Concerns have not just been highlighted in relation to HMO accommodation, which makes use of dwellings formally used as single family accommodation, but also purpose built student halls of residence.
- 2.2 Article 4 Directions, remove permitted development rights which enable family homes to be converted to HMOs without requiring planning permission from the Council. This enables the Council to assess such changes of use and determine them in line with Local Plan policy and other material considerations.

3. Existing Local Plan Policy

- 3.1 Local Plan Part 2, acknowledges that on the whole, HMOs make up a small proportion of the overall housing market and provide an important housing supply for vulnerable households, those on lower incomes, students and young professional sharers. When compared to the rest of the Central Hampshire Housing Market Area, Winchester Town has a higher proportion of single person and sharing households. When the Strategic Housing Market Assessment was updated in 2012, to inform emerging Local Plans at that time, the projections did not predict an increase in multi-person households, but identified that many of these households are in housing need, demonstrating that this type of accommodation is providing an important source of relatively affordable housing.
- 3.2 At the time, in the Stanmore area, over 20% of properties were estimated to be HMOs, many providing student housing, predominantly in the areas of Cromwell Road, the top of The Valley, Upper Stanmore and Stanmore Lane. Apart from the loss of more affordable family homes also needed in Winchester, the overconcentration of HMOs in any one area can create an unbalanced housing mix with increased pressures on parking provision, and this provides the basis for taking action to control the increase in such accommodation by making an A4. The proliferation of HMOs can also create tensions within communities.
- 3.3 Stanmore is a desirable location for students and private-rental landlords. It is within walking distance of the University of Winchester and the style of the properties (predominantly former council housing) allows them to be adapted to provide additional bedrooms and thereby more affordable accommodation for students. Given the steady increase in the number of full time undergraduates attending the University of Winchester in recent years it is anticipated that the demand for HMOs in Stanmore may continue and will not be met by new university developments which tend to cater for first years and international students, nor by privately owned halls of residence, despite facilities being provided recently both in Winnall and close to the railway station. Most 2nd and 3rd year students will still need to seek accommodation elsewhere in the city and therefore represent the greatest demand for private accommodation.
- 3.4 Strong evidence is required to instigate an Article 4 Direction and Policy WIN9 states:-

Policy WIN9 - Houses in Multiple Occupation

In order to retain a balanced housing stock, the Council will designate Article 4 Directions in areas where it is necessary to restrict permitted development rights in relation to the creation of Houses in Multiple Occupation (HMO). In these areas, proposals for the conversion of dwellings to houses in multiple occupation will be permitted where the proposal accords with the Development Plan and:

i) would not create an over concentration of HMOs, with no more than 20% of all properties in the total area being HMOs, or no more than 25% of the properties on any one street in use as HMOs; and

ii) would not result in a dwelling being bounded by HMOs on both sides or a continuous line of 3 or more HMOs. Exceptionally, the change of use of an existing dwelling to an HMO may also be permitted where its suitability for continued use is seriously compromised because of existing domination by HMOs; and

iii) provides parking to meet the needs of the development taking into consideration the availability and adequacy of on-street parking. 'Dwellings' are defined as housing within Use Class C3 and Houses in Multiple Occupation are within Use Class C4 or Sui Generis.

3.5 The Stanmore Article 4 came into force on 2 May 2016 and a further Article 4 was applied to Winnall, which came into effect on 1 May 2018. Evidence indicates that in Stanmore the proportion of HMOs is over 20% and in Winnall it is about 8.5% in 2017 but was rising significantly based on evidence from previous years.

4. Current evidence

4.1 Local concern has been raised about the impact of student HMO accommodation in Fulflood and Badger Farm so data has been reviewed from information available to the Council, like council tax and licensing records, to estimate the number of such properties in this part of the city. Whilst this does not provide a definitive figure for HMOs in these neighbourhoods it does give a good indication of numbers and this approach has been used before in Stanmore and Winnall.

4.2 In Fulflood the total number of residential properties within the area considered is 1853, with the number of individual properties used as HMOs being 69 which gives an overall percentage of 3.7%. There are however, some localised concentrations:

- 203 residential properties in Greenhill Road with 15 as HMO's giving a percentage of 7%
- 14 residential properties in Browning Drive with 6 as HMO's giving a percentage of 43%
- 97 Residential Properties addressed as Romsey Road with 15 HMO giving a percentage of 15%

- Greenhill Close has 27 Residential properties with 9 as HMO's giving a percentage of 33%

- 4.3 Data for Badger Farm reveals out of the total number of dwellings 1093, in 2017 the proportion of HMOs equated to 1.09% and this has increased slightly in 2018 to 1.55%. The above information therefore does not suggest that there is a demonstrable need to apply an A4 to remove permitted development rights in either Fulflood or Badger Farm.
- 4.4 In both areas the roads with the greatest concentrations are small in terms of number of premises and as they already have higher percentages of HMOs the Local Plan policy allows single dwellings to go over to HMO use where they are already dominated by such premises. In other words if a single house is already surrounded by HMOs it would be unreasonable to insist it remain a single family house. It must also be remembered that even with an A4 in place, it does not necessarily mean planning permission will be refused for subsequent applications as Policy WIN.9 allows for new HMOs where a proposal meets the requirements of the policy. Whilst there may be higher numbers in certain roads making a direction to cover these alone could just displace the issue to nearby streets
- 4.5 Officers are not aware of any other areas of the city where the concentration of HMOs is reaching a point where intervention by means of making another A4 would be justified in planning terms.
- 4.6 HMOs are only one element of student accommodation in Winchester, recent purpose built student developments are set out in the table below and indicated on the following map which also highlights the distribution of HMOs.

Planning Permissions Granted up to April 2018

Location	Planning application ref no and date granted planning permission	Type of accommodation	No of units (in terms of bedrooms)	Current status (if known) as at Dec 2018
Riverside Way, Winnall	13/02162/FUL	Purpose built accommodation for both University and of Southampton and Winchester students	Total 237 bedrooms, 128 of which allocated for UoS students	Jul-17
Balfour House, Winnall Close, Winchester, S023 0LB	17/02516/FUL	Purpose built student accommodation (2-3 bedroom cluster flats with shared kitchen/communal area) - Managed by the University	9 (In addition to 16 flats at the preexisting Balfour House)	Under construction
Pine Cottage, 4 Sparkford Road, Winchester, Hampshire, SO22 4NJ	17/01595/FUL	Purpose built student accommodation (studio flats) with communal laundry and recreation facilities	88	Existing premises demolished – construction not started
West Hill House, 47 Romsey Road, Winchester, Hampshire, SO22 5DE	17/00612/FUL	Class C1 study rooms with communal kitchen facilities	23	Completed
Cathedral Point 27 Andover Road, Winchester, Hampshire, SO23 7BT (formally Hunts foodstore site)	15/01489/FUL	Halls of residence comprising self contained 8 bedroom flats (each bedroom ensuite) and also studio apartments	Total bedrooms = 257, 233 ensuite rooms sharing communal facilities and 24 studio apartments	Completed and opened to students Sept 2018

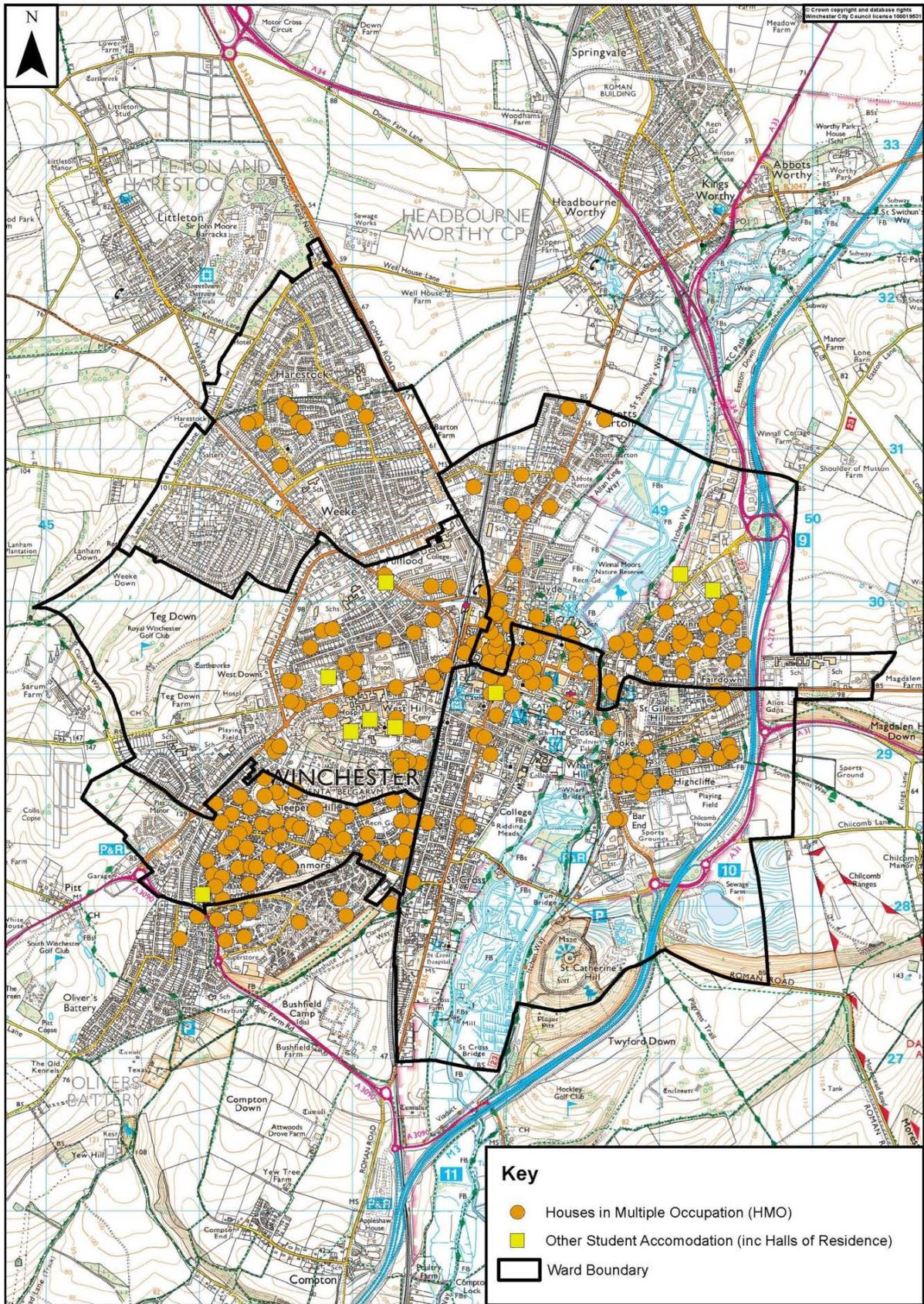


Figure 1: Indication of distribution of student accommodation in Winchester
 *based on data collected from the Council Tax Exemptions (Class M and N) 2017

5. National Planning Guidance regarding student accommodation

National Planning Policy Framework (revised July 2018)

- 5.1 The National Planning Policy Framework sets out key parameters to be covered in both plan making and decision making with numerous references to the provision of housing :-
- Para 20 –“ Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make provision for ...
 - Housing (including affordable housing), employment, retail, leisure and other commercial development”
 - Para 60 - “Strategic plans should be based on a local housing need assessment”
 - Para 61 - “Within this context, policies should identify the size, type and tenure of homes required for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, **students**, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)”

Planning Practice Guidance (updated September 2018):

- 5.2 Housing Need Assessment – strategic planning authorities need to plan for sufficient student accommodation whether it consists of communal halls or self- contained dwellings and take into account both the needs of the student populations as well as local residents. There is also a need to engage with universities and other higher education establishments to ensure student accommodation requirements are understood.

6. Council’s responsibilities with regard to Housing and Licensing Matters

- 6.1 Under the Housing Act 2004, an HMO can be a property occupied by as few as three tenants but the requirement for HMOs to be mandatory licensed only applied to larger HMOs of three storeys or more and occupied by five or more tenants, forming two or more households. However, since the 1st October 2018, the Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 201 requires any HMO occupied by five or more tenants forming two or more households regardless of the number of storeys to be licensed.
- 6.2 New legislation has also introduced a minimum sleeping room size in licensable HMOs of 6.51m² for one person over 10 years of age and 10.22m² for two persons over 10 years of age. A room smaller than the specified size must not be used as sleeping

accommodation, and communal space in other parts of the HMO cannot be used to compensate for rooms smaller than the prescribed minimum. This means that some of the rooms within the current HMO provisions will no longer meet the minimum requirements, although landlords have up to 18 months to resolve, where possible, such situations.

- 6.3 At [Cabinet Housing Committee](#), on 4 July 2018 the Council agreed to expand the scope of the licensing requirements for all HMOs within the Winchester district in line with legislation. The requirement for landlords to declare that they have an HMO which is required to be licensed will provide more certainty as to the number and location of larger HMOs. It will also provide information to ensure that room sizes and standards are adhered to. These measures will help with controlling HMO standards within the City and also provide more clarity regarding where HMOs are located. This in turn will provide a better source of information which will help to inform future planning decisions.

7. Next steps

- 7.1 To inform Local Plan 2036 it will be necessary to undertake the following assessments as evidence to support any planning policy response:
- Full audit of existing student accommodation provision in the city
 - Understanding the changing nature of student accommodation – demand for bigger rooms/ensuite provision etc
 - Commission a Strategic Housing Market Assessment – to include provision vs projected growth rates of students/young working people – potential HMO occupants
 - Understanding plans for growth from all higher education providers in the district over next 15 – 20 years
 - Numbers of students – existing and planned
 - University plans for refurbishment/expansion of existing provision
 - Private sector (non university) provision
- 7.2 The above promotes a holistic approach to consider and respond to the student accommodation needs for Winchester City, taking into account the students from all Universities and Colleges, the current student housing figures, the forecast numbers and the student accommodation provision. This approach needs to be thorough to ensure that the Local Plan is based on robust evidence, to meet the current need as well as for the future.