

H6 - affordable housing

- Support - 21
- 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 H6 - affordable housing		
Respondent number	Comment	Officer comment
ANON-KSAR-NKS3-G Bishops Waltham Parish Council	<p>The Parish Council welcomes that the viability of achieving the relevant needs for affordable homes will be considered at the plan making stage and welcome that the new Local Plan sets clear requirements for affordable housing upfront as opposed to a target.</p> <p>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 with first homes and rental properties specified and that these affordable homes should remain available in perpetuity. The Parish Council notes that the constraints on Housing Exception Sites state that they must be to meet a specific local need that cannot be met elsewhere in the settlement and that these properties should be rental homes.</p>	<p>Thank you for your response – support is noted.</p> <p>Comments on First Homes are noted. The SHMA update has highlighted issues for First Homes and why they are not suitable in the Winchester context, and so this policy requirement has been removed.</p> <p>Proposed Change:</p> <p>Amend the first bullet point after the third paragraph and delete the third bullet point after the third paragraph on policy H6 as follows:</p>

		<ul style="list-style-type: none"> • 2535% as First Homeslow-cost home ownership; and • The remainder as other affordable low cost home ownership (with priority given to homes for Shared Ownership) <p>The exception sites policy is subject to some revisions which are explained in the responses to those representations made to that policy.</p>
ANON-KSAR-NK47-N	We need more affordable housing but very little in Winchester is truly affordable. I think this should be a priority within new developments and for WCC.	<p>The definition of affordable housing is outlined within Annex 2 of the NPPF <u>National Planning Policy Framework (publishing.service.gov.uk)</u></p> <p>The evidence of need for affordable homes is set out in the Strategic Housing Market Assessment and the policy seeks as much affordable housing as can be secured without risking the delivery of sites through site viability.</p>
ANON-KSAR-NKAK-P	<p>CALA Homes welcomes the policy recognition where abnormal costs are experienced due to phosphate neutrality, and adjustments made to on site affordable housing. This is a pragmatic way to recognise that development viability can be affected by material changes in planning policy.</p> <p>We would recommend that wording is added that recognises a similar approach will be taken for Reserved Matter applications including</p>	<p>Policy support is noted.</p> <p>It is not considered necessary to include a specific mention of the applicability of deeds of variation in specific circumstances. If appropriate, mechanisms already exist to enable this to be taken into account.</p>

	<p>Deeds of Variation to existing S106 legal agreements where material planning policy / guidance changes that could not have been envisaged when outline planning permission was originally granted, such as phosphate neutrality, are materially affecting scheme viability.</p> <p>It is recommend the Council speak with Registered Providers to understand the potential implications of the sequential approach to affordable housing tenures to be taken under criteria (v), (vi) and (vii). RPs do not generally take the First Homes - if the vast majority of the remaining affordable housing package is rented, with only notional levels of shared ownership, this can have a fundamental impact on the number of RP offers and financial levels of RP interest.</p>	<p>Comments on First Homes are noted. The SHMA update has highlighted issues for First Homes and why they are not suitable in the Winchester context, and so this policy requirement has been removed.</p> <p>Proposed Change:</p> <p>Amend the first bullet point after the third paragraph and delete the third bullet point after the third paragraph on policy H6 as follows:</p> <ul style="list-style-type: none"> • 2535% as First Homes <u>low-cost home ownership</u>; and • The remainder as other affordable low cost home ownership (with priority given to homes for Shared Ownership)
<p>ANON- KSAR- NKAP-U</p>	<p>I support the policy but in Winchester there needs to be special provision to ensure that social housing or affordable housing is affordable otherwise developers will use the provision to circumvent the intensions of the Planning Authorities.</p> <p>Social housing is required. The area in the SDNP should be included as an area providing housing in the Winchester District as many of the villages and rural areas wish to extend social housing opportunities to meet these smaller communities' own needs.</p>	<p>Affordable housing is defined in Annex 2 of the NPPF</p> <p>The SDNP is its own planning area and is progressing through its own Local Plan review. The Councils are working together under the Duty to Cooperate to ensure both plans are informed by an understand of what will be delivered in each area.</p>

<p>ANON-KSAR-N8YF-P</p>	<p>Where the provision of "affordable housing" makes development unviable, provision towards affordable housing should be delivered elsewhere. If development is still unviable, it should be questioned whether the developer is in a position to provide acceptable development in Winchester.</p>	<p>Your comments are noted – independent assessment of an applicant’s viability report is required to confirm development viability.</p> <p>The Local Plan is informed by a viability assessment produced by professional consultants, using: a well-established methodology; tested through numerous examinations; and consistent with PPG principles; conducted through testing a mixture of site typologies and where appropriate more specific consideration of site allocation proposals that are intended to be key in supporting the planned delivery overall. Therefore, the level of achievable and viable affordable housing delivery has been established.</p>
<p>ANON-KSAR-N81K-K</p>	<p>The consultation document recognises affordability as a Key Issue in Paragraph 9.8; however, the proposed spatial policies do not allow for the required delivery of affordable dwellings due to the heavy reliance on existing commitments and small sites. Paragraph 9.35 of the emerging Local Plan states the largest source of new affordable dwellings will be the proportion secured on larger housing schemes. The emerging Plan also acknowledges that a greater proportion of affordable housing can be achieved on greenfield sites, yet the emerging plan doesn’t allocate any new strategic greenfield sites. Welbeck considers that Mount Edgecombe is an optimal location to deliver a policy compliant level of affordable housing, in a sustainable location, ensuring it provides a significant contribution to this identified shortfall.</p>	<p>Comments are noted. The Plan does allocate significant new sites for development. The distribution of development and the relative merits of sites is addressed in the Development Strategy and Site Selection Background Paper</p>

<p>BHLF- KSAR- N8T8-3 Olivers Battery Parish Council</p>	<p>OBPC support this policy. However, the method of calculating “affordable” housing does not make them truly affordable. The changes put forward by the Secretary of state for DLUHC on 5 December also include for authorities to increase the proportion of affordable housing and should be given serious consideration. An identified number or proportion of social housing, based on local need, should be included in the Local Plan. To help ensure the required supply of social housing, OBPC suggest that a separate policy be included in the Local Plan for social housing.</p>	<p>Support is noted - The definition of affordable housing is outlined within Annex 2 of the NPPF <u>National Planning Policy Framework</u> (publishing.service.gov.uk)</p> <p>The Local Plan is informed by a viability assessment produced by professional consultants, using: a well-established methodology; tested through numerous examinations; and consistent with PPG principles; conducted through testing a mixture of site typologies and where appropriate more specific consideration of site allocation proposals that are intended to be key in supporting the planned delivery overall. Therefore, the level of achievable and viable affordable housing delivery has been established.</p>
<p>BHLF- KSAR-N87J- R Micheldever Parish Council</p>	<p>We support this policy, however would we feel that the split of equity / tenure on Exception Sites should be guided by the local community need as evidenced in a pre-allocation survey.</p>	<p>Support is noted – the approach to the rural exceptions policy is set out in the response to emerging Plan policy H7.</p>
<p>BHLF- KSAR- N8BS-C</p>	<p>BSP support the policy compliant level of affordable housing and the short term flexibility built within to reduce the provision to account for any mitigation in relation to phosphates.</p> <p>The policy also proposes a set percentage of First Homes and Social Rent. BSP recommend that some flexibility be built into the policy</p>	<p>Support is noted . The policy does allow for evidence of local needs to also be taken into account when considering tenure mix as and when sites come forward for development. Comments on First Homes are noted. The SHMA</p>

	<p>so that the relevant tenure is delivered within the right location. The generic tenure split will not be applicable to certain parts of Winchester District given its geographic spread and varied market. This flexibility will also mean that the policy can accommodate changes within the market should demands for social rent change during the plan period.</p>	<p>update has highlighted issues for First Homes and why they are not suitable in the Winchester context, and so this policy requirement has been removed.</p> <p>Proposed Change:</p> <p>Amend the first bullet point after the third paragraph and delete the third bullet point after the third paragraph on policy H6 as follows:</p> <ul style="list-style-type: none">• 2535% as First Homes<u>low-cost home ownership</u>; and• The remainder as other affordable low cost home ownership (with priority given to homes for Shared Ownership)
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Comments which neither support nor object to H6 - affordable housing		
Respondent number	Comment	Officer comment
ANON-KSAR-NKWV-Q	Owslebury Parish Council would like to have seen more allocation for affordable homes in the plan and would like to understand what ambition the Council has to deliver more affordable homes in the future.	Policy H6 will facilitate the delivery of affordable housing on all allocated sites and any windfall applications that meet the criteria set out within the policy – some allocated sites may also, should they come under ownership of a registered provider, result in 100% affordable homes being delivered. The Plan also allows for rural exception sites to come forward to help meet local housing needs as set out in emerging Plan policy H7.
ANON-KSAR-NK6M-D	<p>There seem to be plenty of houses on sale towards the lower end of the scale, would it not be possible for Winchester to buy these houses and add them to the council stock thus allowing for more people to be housed and reducing the waiting lists? And reintroduce the help to buy/home start scheme that ran for a while.</p> <p>Also, wherever there are new houses being built can planning not insist there be a equal number of more affordable ones build on the same site.</p>	<p>Comments are noted – suggestions to buy housing stock are beyond the remit of the Local Plan.</p> <p>The level of affordable housing in the Policy is set so as to maximise delivery of affordable housing without prejudicing the delivery of the overall housing requirement, taking into account other policy and infrastructure costs. Full details are set out in the Viability reports prepared on behalf of the Council.</p>
ANON-KSAR-NKZU-S	The affordable housing thresholds are supported for the delivery of class C3 residential housing however, this should not include class C2 care/extra care.	Policy support is noted, and C2 developments are not covered by this policy.

	<p>Class C2 institutions, regardless of whether they are self-contained units or bedspaces should be treated independently from this policy with the removal of any requirement to deliver affordable housing.</p> <p>Additional wording should be included with regards to self-custom build developments when considering the affordable tenure mix (with the inclusion of First Homes) on a case by case, or allocation policy basis.</p>	<p>The policy applies to all developments which exceed the threshold set out in the first paragraph, and there is no compelling justification for a different approach for self or custom build.</p>
ANON-KSAR-N8UN-T	<p>The City Council should build many more good quality council houses. Housing is incredibly expensive in Winchester and has become out of reach for many; the Government should assist with their provision.</p> <p>This should be a top priority taking precedence over road building and encouraging traffic.</p>	<p>Comments are noted – the suggestions made are outside of the remit of the Local Plan review.</p>
ANON-KSAR-N8M7-U	<p>This policy sets affordable housing requirements with the Council also recognising that when mitigating the impact of phosphates, requirements will be reduced, of which is welcomed. There are concerns that the cost of delivering some policies has been underestimated.</p> <p>Regarding Biodiversity Net Gain (BNG), the viability assessment considers this to be c.£5,780 per unit of which is wholly dependent on the base level of biodiversity and degree to which it can be addressed on site without compromising the developable area and the viability of that site.</p> <p>In such cases the developer will need to deliver BNG through the purchase of BNG units elsewhere – a more expensive solution. The uncertainty regarding costs means the Council will need to ensure that there is sufficient headroom within development viability..</p>	<p>Comments are noted – the Viability Assessment is an iterative process and has been updated for the next stage of the Local Plan review process. This will also use the most up-to-date information and consider the implications of BNG in practice.</p>

<p>ANON- KSAR- NKTV-M Compton and Shawford Parish Council</p>	<p>Unsure if this is the correct policy but would make the comment that there is no allowance for Park Homes which do form a sizeable proportion of the accommodation in certain areas and, although depreciation applies, are still a home for those who cannot afford bricks and mortar.</p>	<p>Comment is noted – there is no policy presumption against the development of Park Homes across the Plan; but it is noted there are issues with securing mortgages and costs can still be high for owners and occupiers. Whilst such accommodation is suitable for some, it is not considered a suitable substitute for affordable housing.</p>
<p>ANON- KSAR- N8XU-4</p>	<p>Grainger Plc supports the flexible wording set out within Draft Policy H6, which allows developers to present an exceptional circumstances case to be made in relation to the proposed affordable housing tenure mix on a site-by-site basis. Maintaining such flexibility within the policy is considered important for the continued, successful and viable implementation of sites such as Berewood.</p>	<p>Support is noted.</p>
<p>BHLF- KSAR- N8TK-P</p>	<p>The affordable housing requirements set out within the policy are commendable and suggests a greater focus on viability at the plan making stage. The affordable housing targets set out in Policy H6 are informed by the Viability Assessment and it is appreciated that the assessment is still pending completion.</p> <p>It is noted that the document has assessed the viability of the Extra Care older persons' housing typologies and that reference is made to Sheltered typologies. It is appreciated that this is an interim document and noted that some of the methodology inputs for assessing specialist older persons' housing align with the methodology detailed in a briefing note prepared for the Retirement Housing Group. The NPPG makes provision for the setting of different targets for different typologies, and we request that we be kept informed of further opportunities to comment on specific viability testing for this typology.</p>	<p>Comments are noted – the Viability Assessment is an iterative process and has been updated for the next stage of the Local Plan review process using the latest data available to ensure its robustness. Opportunity to further comment on the published plan's legal and procedural compliance will take place during in the Proposed Submission consultation.</p>

	<p>We would also caution against setting the policy requirements for development at the margins of viability. It is forecast that the knock on impact on mortgage affordability and wider cost of living issues at present will put an end to the inflation seen in house price growth seen over the last few years. In general, market commentators are forecasting house price reductions across the market during 2023.</p> <p>The immediate outlook therefore is for costs to continue to inflate with some uncertainty in relation to open market sales values beyond 2022. In light of the above, we would suggest that the Council ensure there is sufficient headroom in the viability of developments and that its policy requirements are robustly tested.</p>	
BHLF- KSAR- N8T5-Z	<p>Having read the response of Oliver's Battery Parish Council I agree with their views. Particularly their comments regarding :-</p> <p>Affordable housing (policy H6)</p>	Comments are noted.
BHLF- KSAR-N8ZJ- U	<p>Policy is supported and reductions concerning nutrient neutrality are welcomed.</p> <p>The mix of affordable dwellings as specified is considered overly prescriptive. The policy should be amended to include the requirement for a provision of first homes, social/affordable rent and other affordable home ownership to be negotiated on a site-by-site basis dependent on market requirements and an up-to-date housing market assessment.</p> <p>Aspirations for First Homes were first set out in the Written Ministerial Statement dated 24th May 2021 and supplemented by further guidance in the National Planning Practice Guidance (23 December 2021). No further guidance has been published. We disagree with the implication that First Homes should account for 25% of affordable</p>	<p>Support is noted</p> <p>Comments on First Homes are noted. The SHMA update has highlighted issues for First Homes and why they are not suitable in the Winchester context, and so this policy requirement has been removed.</p> <p>Proposed Change:</p> <p>Amend the first bullet point after the third paragraph and delete the third bullet point after the third paragraph on policy H6 as follows:</p>

	<p>housing units and urges the Council to update the Plan to introduce a degree of flexibility.</p>	<ul style="list-style-type: none"> • 2535% as First Homes <u>low-cost home ownership</u>; and • The remainder as other affordable low cost home ownership (with priority given to homes for Shared Ownership) <p>The policy allows for tenures to be negotiated on a site-by site basis – but on balance if is considered appropriate to include an appropriate starting point in terms of affordable tenure mix in line with the updated SHMA.</p>
<p>BHLF-KSAR-N8BF-Y</p>	<p>The policy should acknowledge that management requirements for affordable homes influences the location and design and should be supported in appropriately scaled clusters, integrated with the wider development.</p>	<p>Comments are noted – as stated within the policy, affordable housing should be “indiscernible from, well integrated with and dispersed throughout the market housing”. This does not prevent clusters.</p>
<p>BHLF-KSAR-N863-Z</p>	<p>Questions robustness of the Council’s Viability Assessment and suggests reduction of affordable housing percentages on this basis.</p> <p>Winchester is one of the most unaffordable places to live and is unclear how the Council will address this given the reduction in affordable housing requirements from the policy in the existing plan to what is proposed in the emerging plan. Suggests the Council considers an uplift to the housing requirement to address this.</p>	<p>Comments are noted.</p> <p>The Local Plan is informed by a viability assessment produced by professional consultants, using: a well-established methodology; tested through numerous examinations; and consistent with PPG principles; conducted through testing a mixture of site typologies and where appropriate more specific consideration of site allocation proposals that are</p>

		<p>intended to be key in supporting the planned delivery overall. Therefore, the level of achievable and viable affordable housing delivery has been established. The Viability Assessment is an iterative process and has been updated for the next stage of the Local Plan review process using the latest data available to ensure its robustness.</p> <p>The Council's approach to the overall housing delivery is set out in the Housing Delivery Background paper and the responses to emerging Policy H1.</p>
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Comments which object to H6 - affordable housing		
Respondent number	Comment	Officer comment
ANON-KSAR-NKWQ-J	<p>The Viability Report looks principally at C3 residential schemes and only looks at 1 x 60 flatted 'extra care' development. This is only one of the different typologies of specialist housing and there is a need to assess all typologies of specialist housing - sheltered housing/retirement housing; age restricted housing; extra care / integrated retirement communities; and care homes. A Viability Assessment Addendum is required to properly assess the different typologies.</p> <p>With integrated retirement communities, these can range in size from 60</p>	<p>Comments are noted - The Local Plan is informed by a viability assessment produced by professional consultants, using: a well-established methodology; tested through numerous examinations; and consistent with PPG principles; conducted through testing a mixture of site typologies and where appropriate</p>

	<p>to 250 units (C2 use class). They provide IRO 20-25% of floorspace as non-saleable space delivering the significant on-site communal facilities (cafe, restaurant, activity space, meeting room, shop, hairdressers, gym, fitness studio, treatment rooms, pool, etc) and which are delivered on 1st occupation at significant cost; they have a slower sales rate (typically buyers are over-75); low off-plan sales meaning empty homes will incur void costs (service charge and council tax costs to the operator), higher build costs, etc. All of this has not been reflected in the viability assessment and must be rectified.</p>	<p>more specific consideration of site allocation proposals that are intended to be key in supporting the planned delivery overall.</p> <p>The Viability Assessment is an iterative process and has been updated for the next stage of the Local Plan review process using the latest data available to ensure its robustness.</p>
ANON-KSAR-NKZB-6	<p>We need social housing, not affordable housing.</p>	<p>Comments are noted –affordable housing is defined in Annex 2 of the NPPF and this includes social rent. The affordable tenure split in this policy is informed by the SHMA and ongoing viability work, and is considered to be the best approach to meeting identified housing needs.</p>
ANON-KSAR-NK79-T	<p>The definition of affordable housing needs to be clarified. Dwellings for rent should use affordability as compared to local income, rather than local rents. In this way the units will actually be affordable to local people.</p>	<p>Comments are noted – affordable housing is defined in Annex 2 of the NPPF.</p> <p>The policy has been revised to include reference to Local Housing Allowance level, as well as market rents.</p>
ANON-KSAR-NKHU-7	<p>OBPC support this policy. However, the method of calculating “affordable” housing does not make them truly affordable. The changes put forward by the Secretary of state for DLUHC on 5 December also include for authorities to increase the proportion of affordable housing</p>	<p>Support is noted - The definition of affordable housing is outlined within Annex 2 of the NPPF.</p>

<p>Oliver's Battery Parish Council</p>	<p>and should be given serious consideration. An identified number or proportion of social housing, based on local need, should be included in the Local Plan. To help ensure the required supply of social housing, OBPC suggest that a separate policy be included in the Local Plan for social housing.</p>	<p>The Local Plan is one part of the Council's response to housing needs. The Council also has a range of other housing strategies and a specific local plan policy on affordable housing is not appropriate.</p>
<p>ANON-KSAR-NKA4-Y</p>	<p>Policy requirements are unsound due to the proportion being too high, and unaffordable from a developer's perspective resulting in schemes becoming a viability debate. Difficult economic times are likely to result in less developments coming forward and less affordable housing being produced. If the Council took a more reasoned approach of 25%, it would remove a lot of the tensions in the process and result in a higher number of affordable units being produced.</p> <p>The policy also takes no account of the fact that social housing providers often want a different unit mix to that of the market units. It would be more robust if the percentage of affordable housing was based on the overall number of habitable rooms.</p>	<p>Comments are noted - The Local Plan is informed by a viability assessment produced by professional consultants, using: a well-established methodology; tested through numerous examinations; and consistent with PPG principles; conducted through testing a mixture of site typologies and where appropriate more specific consideration of site allocation proposals that are intended to be key in supporting the planned delivery overall. Therefore, the level of achievable and viable affordable housing delivery has been established.</p> <p>The Viability Assessment is an iterative process and has been updated for the next stage of the Local Plan review process using the latest data available to ensure its robustness. Furthermore, the policy can be varied on the basis of an independently assessed viability statement confirming the need to. This</p>

		<p>will be part of the decision-making process and be determined by the decision maker as part of the planning balance exercise.</p>
<p>ANON-KSAR-NK2Q-D</p>	<p>Policy requirement for provision on sites of 10 units or more is welcomed, however, the policy fails to reflect the requirements of Build to Let housing of Paragraph 65 of the National Planning Policy Framework, which states the following:</p> <p>Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership 31 , unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. Exemptions to this 10% requirement should also be made where the site or proposed development:</p> <ul style="list-style-type: none"> (a) provides solely for Build to Rent homes; (b) provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students); (c) is proposed to be developed by people who wish to build or commission their own homes; or (d) is exclusively for affordable housing, an entry-level exception site or a rural exception site. <p>Thus, where a development is exclusively Build to Rent no affordable</p>	<p>Comments are not agreed. The specific reference to the NPPF refers to the need for 10% affordable home ownership, not all forms of affordable housing.</p>

	<p>housing should be required. Winchester District Local Plan should reflect this.</p>	
<p>ANON-KSAR-NK4R-G</p>	<p>We would 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 Paragraph: 002 Reference ID: 10-002-20190509. The evidence underpinning the Council's planning obligations and building requirements should therefore be robust.</p> <p>Specialist older persons' housing is more finely balanced than 'general needs' housing and older person's housing typologies should be robustly assessed separately in the Local Plan Viability Study. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG. If this is not done, the delivery of specialised housing for older people may be significantly delayed due to discussion regarding policy areas such as affordable housing, when considering the housing need for older persons identified within the SMHA para 6.28.</p> <p>To ensure the plan is found sound the council should widened the vibility assessment to include of typologies that includes older person's housing and then incorporated into policy.</p> <p>Policies also require a proportion of affordable homes to be provided as First homes, other affordable home ownership or social/affordable rent. The Local Plan should clarify that certain specialist housing schemes such as those meeting the needs of older people should be exempt from providing First homes and Starter homes on site.</p> <p>Ensure that the viability assessment is widened to include a number of typologies that includes older person's housing. The outcome of the assessment of viability of older persons housing should then be incorporated into Policy H6 Affordable Housing.</p>	<p>Comments are noted - The Local Plan is informed by a viability assessment produced by professional consultants, using: a well-established methodology; tested through numerous examinations; and consistent with PPG principles; conducted through testing a mixture of site typologies and where appropriate more specific consideration of site allocation proposals that are intended to be key in supporting the planned delivery overall.</p> <p>The Viability Assessment is an iterative process and will be updated for the next stage of the Local Plan review process using the latest data available to ensure its robustness and will include an extension of typologies ot include specialist forms of accommodation.</p> <p>Purpose built accommodation for the elderly is exempt from the provision of delivering affordable home ownership under para. 65 of the NPPF; it is therefore unnecessary to stipulate this within policy.</p>

	<p>Amend policy H5/H6 to ensure older people’s housing is exempt from delivering First Homes, Starter homes and Discount Market Sales onsite.</p>	<p>Comments on First Homes are noted. The SHMA update has highlighted issues for First Homes and why they are not suitable in the Winchester context, and so this policy requirement has been removed.</p> <p>Proposed Change:</p> <p>Amend the first bullet point after the third paragraph and delete the third bullet point after the third paragraph on policy H6 as follows:</p> <ul style="list-style-type: none"> • 2535% as First Homes<u>low-cost home ownership</u>; and • The remainder as other affordable low cost home ownership (with priority given to homes for Shared Ownership)
<p>ANON-KSAR-NKJ4-8</p>	<p>Concerns that the policy wording creates a lack of certainty in respect of the reduction to the requirement where developments are required to mitigate the impact of additional nitrates and phosphates. It is understood why the requirement may be reduced to ensure viability, however the proposal to reinstate a higher requirement in future is unlikely to work.</p> <p>It is not clear how changes in cost would be measured and monitored in practice, and therefore it is uncertain that schedules in a Section 106 Agreement would provide an effective ‘value capture’ mechanism for purposes envisaged.</p>	<p>The supporting text notes that any significant changes relating to the affordability of mitigation will be reported in the Authority Monitoring Report. Should that indicate that the costs of mitigation have changed significantly then that may, after taking into account other costs and values at that time, indicate that the additional 5% reduction in affordable housing</p>

	<p>It is suggested that the affordable housing tariff is set at 25% and 35% (respectively for previously developed and greenfield sites), with this matter being revisited within 5-years of the Plan's adoption, when WCC will undertake a review of the Plan.</p> <p>In order to off-set the current shortfall in affordable housing, the Local Plan should increase the overall housing requirement. The increase in market housing provision will facilitate the viability and supply of new affordable homes. Noting that the evidence base is unclear when the cost of mitigation will reduce an uplift in the overall housing requirement appears necessary to ensure that affordable housing needs are fully met.</p>	<p>requirement (or a proportion thereof) is removed. The mechanism for this will be determined at that time, but could include inclusion in the next Local Plan or other non-statutory process. In any case, such a measure will need to be supported by a full viability assessment.</p> <p>The Council's approach to the overall housing delivery is set out in the Housing Delivery Background paper and the responses to emerging Policy H1.</p>
ANON-KSAR-NKDH-P	<p>The requirement in rural areas is very different to Winchester. Rural locations have a requirement for 2 and 3 bed houses with min of two parking spaces. The proportion of shared equity should be 60% and rented 40%. The shared equity should be based on build cost % of value and properties should be rent proportion chargeable after 10 years and further increased after 15 years to encourage residents to move to open market to release for younger generation following on to have properties available. Properties should equally be prevented from extensions being added which moves properties out of starter home access.</p>	<p>The policy is informed by the evidence in the SHMA update. Should more recent evidence on local needs be available to inform planning applications, then this can be taken into account.</p> <p>The Council seeks to restrict the loss of smaller homes in the countryside under policy H8.</p>
ANON-KSAR-NKJV-A	<p>Supports the provision of a policy compliant level of affordable housing, reflecting the continued need for affordable homes in the district.</p> <p>It is noted that the affordable housing provision requires First Homes and Social Rent. To ensure that the right type of affordable homes are delivered, such targets should be applied flexibly based on local need and site specific circumstances. This will also ensure that the local plan is</p>	<p>The policy and supporting text allow for variation of affordable housing tenure where supported by evidence of need and if necessary viability. Comments on First Homes are noted. The SHMA update has highlighted issues for First Homes and why they are not suitable in the Winchester</p>

	<p>responsive to potential shifts or changes in local affordable housing need over the duration of the plan period, as referenced at paragraph 9.37.</p>	<p>context, and so this policy requirement has been removed.</p> <p>Proposed Change:</p> <p>Amend the first bullet point after the third paragraph and delete the third bullet point after the third paragraph on policy H6 as follows:</p> <ul style="list-style-type: none"> • 2535% as First Homes <u>low-cost home ownership</u>; and • The remainder as other affordable low cost home ownership (with priority given to homes for Shared Ownership)
<p>ANON-KSAR-NKUC-2</p>	<p>Supports policy but has concerns that the policy wording creates a lack of certainty where developments are required to mitigate the impact of additional nitrates and phosphates on the River Itchen SAC. The proposal to reinstate a higher requirement in future if the costs of nutrient-related mitigation reduce is not likely to be workable and effective.</p> <p>It is not clear how changes in cost would be measured and monitored in practice, and therefore it is uncertain that schedules in a Section 106 Agreement would provide an effective 'value capture' mechanism for purposes envisaged.</p>	<p>The supporting text notes that any significant changes relating to the affordability of mitigation will be reported in the Authorities Monitoring Report. Should that indicate that the costs of mitigation have changed significantly then that may, after taking into account other costs and values at that time, indicate that the additional 5% reduction in affordable housing requirement (or a proportion thereof) is removed. The mechanism for this will be determined at that time, but could include inclusion in the next</p>

	<p>Instead, it is suggested that the affordable housing tariff is simply set at 25% and 35% with this matter being revisited within 5-years of the Plan's adoption, when WCC will undertake a review of the Plan.</p> <p>To off-set the shortfall in affordable housing, the Local Plan should increase the overall housing requirement allocate additional land for development.</p> <p>Furthermore, the Plan should be revised to allocate additional sites that have the potential to provide on-site nutrient mitigation. Land South of Titchfield Lane is one such site and therefore merits proper consideration, as it could provide nutrient mitigation as an integral part of the scheme design, without significant impacts on build costs. It would therefore also be possible to provide 40% affordable housing, in accordance with the proposed policy requirement.</p>	<p>Local Plan or other non-statutory process. In any case, such a measure will need to be supported by a full viability assessment.</p> <p>The Council's approach to the overall housing delivery is set out in the Housing Background paper and the responses to emerging Policy H1.</p>
ANON-KSAR-N8M8-V	<p>(Please note the response to this policy includes a table that should be referenced within the representations report submitted separately to this consultation. This on-line format for making submissions does not adequately support the presentation of such material, which is central to the points being made. The content of the table is provided alongside the text hereby submitted)</p> <p>Policy H6 – Affordable Housing provides the latest policy response to the 'key priority' identified earlier in the Draft Local Plan. The challenge of providing sufficient levels of affordable housing to meet needs arising within Winchester district and at Winchester Town specifically has been a long established and chronic problem that remains unresolved. Reference to past rates of delivery compared to need is illuminating:</p> <p>Table 9: Winchester District Affordable Housing Requirement/Delivery 2011-21 (AMR/SHMA – WCC)</p> <p>2011/12 2012/13 2013/14 2014/15 2015/16 2016/17 2017/18 2018/19</p>	<p>The Council's approach to the overall housing delivery is set out in the Housing Background paper and the responses to emerging Policy H1. This also outlines the extent to which the Government's "standard method" has already increased the housing requirement above and beyond that indicated by the population projections for district. There is therefore already a significant amount of additional housing included in the assessment of need which, together with a buffer to include a contribution for unmet needs arising in neighbouring authorities, includes a significant increase in</p>

<p>2019/20 2020/21 Total Total housing completions 317 204 470 262 421 555 547 810 636 804 5026 Total AH completions 71 68 149 82 92 153 169 283 142 300 1509 SHMA requirement 519 519 519 519 519 519 519 519 343 343 4838 SHMA Shortfall -448 -451 -370 -437 -427 -366 -350 -236 -201 -43 -3329 % AH achieved 22% 33% 32% 31% 22% 28% 31% 35% 22% 37% 30%</p> <p>The delivery of affordable housing across the district over the last decade has fallen significantly short of the Council's own published SHMA requirement (although it is notable that delivery has improved in recent years as the MDA allocated within the adopted development plan are being built out) and has failed to respond adequately to need. The table above shows that not once in the preceding ten-year period has the policy objective of 40% been achieved, which is a clear demonstration that the policies pursued by the Council have not been effective.</p> <p>The Council began examining affordable housing delivery against the adopted spatial strategy in its 2020/21 AMR, as a consequence there is currently only one year of data to analyse: this shows the MDAs (policies W2, SH2 and SH3) delivered 158 of the 300 affordable homes constructed that year, 53% of the affordable housing completions in the district.</p> <p>Across the three MDAs an average of 43% of new homes delivered have been affordable, compared to just 22% at Winchester Town, and 36% within the MTRA demonstrating clearly the comparative effectiveness of the MDA strategy.</p> <p>The paragraphs preceding Policy H6 recognise and assess the problems faced by those trying to access the housing market in Winchester and</p>	<p>growth in this area which will deliver additional affordable housing.</p> <p>The emerging development strategy does include significant development in Winchester Town, including a large strategic site at Sir John Moore Barracks.</p>
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note at paragraph 9.31 that the affordability of housing in Winchester district continues to be a major issue. Therefore the delivery of affordable homes remains a critical priority. These statements naturally beg the question: what therefore does the Council propose to do about this issue in policy-making terms that differs from the measures that have been taken before that have demonstrably failed to resolve the major/critical issue that the Council recognises and classifies as a 'key priority' it must tackle through the policies of this new Local Plan?

The supporting text notes that viability has proved to be a significant challenge in the past meaning that many schemes that were relied upon to deliver housing as components of the overall housing strategy failed to do so. The Plan recognises that small housing sites and previously developed sites identified for residential use are subject to greater challenges in respect of their viability and so are less likely to deliver affordable housing, or to do so in quantities that meet the overall policy requirement. In the face of a deepening affordability crisis, it naturally calls into question the Council's continuing over-reliance on windfall sites as a key component of the proposed housing delivery strategy. In the case of Winchester Town windfalls are the second largest delivery component behind the already committed Barton Farm/Kings Barton MDA. Such a strategy offers little prospect of the Council's policy on affordable housing requirements being met (as past evidence demonstrates).

The Draft Plan recognises that the main sources of affordable housing supply will be from larger market-led developments where the viability of provision is more assured and the evidence provided above bears this out.

Having regard to the foregoing this demonstrates in compelling fashion why the Council should re-think its overall strategy and commit to

	<p>delivering MDA scale growth at Winchester Town where affordability is most challenging and where the opportunity exists to most effectively address the priorities that the Council has identified as objectives for the Local Plan – the climate emergency and the affordability of housing. The two are inextricably linked and should be tackled by a positive and proactive planning policy framework with focussed strategic scale growth at Winchester Town.</p> <p>Vistry and Taylor Wimpey are able to commit to achieving full policy compliance in respect of affordable housing delivery if their land interests at North Winchester are incorporated into the Local Plan.</p> <p>The delivery of affordable housing across the district over the last decade has fallen significantly short of the Council’s own published SHMA requirement and has failed to respond adequately to need - 40% delivery of affordable housing has not been achieved in any of the years during this period.</p> <p>Across the three MDAs an average of 43% of new homes delivered have been affordable, compared to just 22% at Winchester Town, and 36% within the MTRA demonstrating clearly the comparative effectiveness of the MDA strategy.</p> <p>The affordability of housing in Winchester district continues to be a major issue; what therefore does the Council propose to do about this issue in policy-making terms that differs from the measures that have been taken before?</p> <p>Viability and an over reliance on windfall development has historically proven to be an issue. The Draft Plan recognises that the main sources of affordable housing supply will be from larger market-led developments where the viability of provision is more assured.</p>	
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	<p>Having regard to this the Council should re-think its overall strategy and commit to delivering MDA scale growth at Winchester Town where affordability is most challenging and where the opportunity exists to most effectively address the plan's priorities.</p>	
ANON-KSAR-N8YU-5	<p>I support this policy. However, the method of calculating prices of "affordable" housing does not make them truly affordable in Winchester. Following the changes put forward by the Secretary of State for Levelling Up, Housing & Communities on 5 December, WCC should increase the proportion of affordable housing. Completely separate from "affordable" housing, an identified number or proportion of social housing, based on local need, should be included in the LP.</p>	<p>The definition of affordable housing is outlined within Annex 2 of the NPPF.</p> <p>The updated SHMA provides an assessment of the need of various affordable housing products. The Plan strategy is to focus primarily on affordable rent to maximise the number of units which can be delivered on market-led housing schemes.</p>
ANON-KSAR-N8QS-U	<p>The approach proposed leads to significant distortions not only in the location, but the timing and tenure of housing delivery.</p> <p>With regard to location, this means that a very large proportion of the supply that is demonstrably able to meet supply in the first 7-8 years of the plan especially is in locations adjoin the PfSH HMAs at North Whiteley and West of Waterlooville. Substantial commitments also exist in a string of relatively small settlements from Coldens Common South East towards Wickham and Denmead, south of the National Park. With the exception of Bartons Farm at Winchester, these commitments accounts for the vast majority of housing supply in the initial years of the plan. Notably they support a trajectory that substantially over-delivers against the nominal housing need of the District – a quantum that pays minimal account to the needs of PfSH, for which much of this quantum was justified in the last local plan review.</p>	<p>The Council's approach to the overall housing delivery is set out in the Housing Background paper and the responses to emerging Policy H1. This also outlines the extent to which the Government's "standard method" has already increased the housing requirement above and beyond that indicated by the population projections for district. There is therefore already a significant amount of additional housing included in the assessment of need which, together with a buffer to include a contribution for unmet needs arising in neighbouring authorities, includes a significant increase in</p>

	<p>In effect, the approach re-hypothecates development sited to meet the needs of PfSH HMAs on the very edge of the plan area to meeting the needs of the plan area at large, and Winchester city implicitly. While arithmetically the administrative “redirection” of this substantial development “pipeline” serves to very greatly attenuate the need to undertake the challenging task of finding suitable new sites that needs those needs arising in the centre of the plan area sustainably, it is not justified.</p> <p>Nor does it create a sustainable patter of development, given that the location of new housing largely is in places far distant to the economic and demographic heart of the plan area at Winchester. If in facy development in North Whitely and West of Waterlooovile is predominantly going to meet the City’s needs, as opposed to the adjoining HMAs it begs the question as to how those resulting patterns of movements over relatively long distances, can be sustainably accommodated.</p> <p>There is a clear implication for affordable housing delivery. The SHMA indicates that over 43% of the entire development quantum is required as affordable tenures. However, the existing commitments will deliver far below that figure. Small sites under 10 dwellings will deliver none, and windfalls may well deliver little or nothing depending on their size and development viability.</p> <p>Affordability in Winchester and especially in the City itself – presents in our view a compelling reason why the Council needs to do its utmost to boost housing supply in the plan area, and in the City of Winchester in particular. The affordability ratio, published by the Office for National Statistics (ONS) is based on the house price to workplace-based earnings for each LPA. For Winchester this ratio has been increasing from an already exceptionally high level, since 2014, to the point where it stands at 14.14. This places Winchester among the least affordable 40 local authority districts (LADs) in England, of 330 in total, and in the worst</p>	<p>growth in this area which will deliver additional affordable housing. The Council’s own housing build strategy sets out its proposals for additional housing to help meet affordable housing needs.</p>
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20 outside the Greater London Authority.

Economically and socially this is evidently unsustainable. Among other things, it creates a situation where to find affordable accommodation, locally-employed staff are having to commute great distances, especially from the north, around Basingstoke and Andover, but beyond into East Wiltshire. The vast majority of this is by car. This is very evident in Census results from 2011 and we have no doubt will be no better - and probably a great deal worse - when the results of the 2021 survey are published.

At section 1.2 and later at para 9.8 the council itself recognises that this is a “key issue” from the District. It forms a key part of the prioritisation framework for the plan as a whole. At paragraph 9.31 the language is stronger stating that “the affordability of housing in Winchester district continues to be a major issue and therefore the delivery of affordable homes remains a critical priority of the new Local Plan”

It ought to follow then, that the plan takes vigorous and focused action to address the issue, by seeking to substantially boost housing supply, and especially affordable housing tenures.

However, it is far from clear that the LPR is seeking to do this. Largely it consists largely of a “roll forward” of existing LP allocations and a wide range of other policies by 8 years. Over 70% of the overall provision, equivalent to all of the delivery required in the first ten years of the plan, is accounted for by completions since 2019, commitments and allocations already made in the existing Local Plan with a horizon of 2031. Only 7% of the identifiable requirements of the plan - as they are currently determined - involve new allocations.

The only significant sites in and near Winchester including Sir John Moore Barracks are PDL and are likely to support relatively modest levels of affordable housing on viability grounds. Certainly there is no

	<p>credible prospect of the entirety of the housing on these sites being affordable, which starts to be the implication if the affordable housing requirement in the SHMA is to be met. So, in practice, the current strategy is likely to lead not only to an inadequate supply across all tenures in and adjoin Winchester, but a particular suppression of affordable housing delivery. It ought to be relatively straightforward for the Council to re-visit this matter and look at credible and transparent assumptions about affordable housing delivery across the housing trajectory in and adjoining Winchester, to fully expose this risk.</p>	
<p>ANON-KSAR-N85K-Q</p>	<p>Concerns that the policy wording creates a lack of certainty in respect of the reduction to the requirement where developments are required to mitigate the impact of additional nitrates and phosphates. It is understood why the requirement may be reduced to ensure viability, however the proposal to reinstate a higher requirement in future is unlikely to work.</p> <p>It is not clear how changes in cost would be measured and monitored in practice, and therefore it is uncertain that schedules in a Section 106 Agreement would provide an effective 'value capture' mechanism for purposes envisaged.</p> <p>It is suggested that the affordable housing tariff is set at 25% and 35% (respectively for previously developed and greenfield sites), with this matter being revisited within 5-years of the Plan's adoption, when WCC will undertake a review of the Plan.</p> <p>In order to off-set the current shortfall in affordable housing, the Local Plan should increase the overall housing requirement. The increase in market housing provision will facilitate the viability and supply of new affordable homes. Noting that the evidence base is unclear when the cost of mitigation will reduce an uplift in the overall housing requirement appears necessary to ensure that affordable housing needs are fully met.</p>	<p>The supporting text notes that any significant changes relating to the affordability of mitigation will be reported in the Authority Monitoring Report. Should that indicate that the costs of mitigation have changed significantly then that may, after taking into account other costs and values at that time, indicate that the additional 5% reduction in affordable housing requirement (or a proportion thereof) is removed. The mechanism for this will be determined at that time, but could include inclusion in the next Local Plan or other non-statutory process. In any case, such a measure will need to be supported by a full viability assessment.</p> <p>The Council's approach to the overall housing delivery is set out in the Housing Delivery Background paper</p>

		and the responses to emerging Policy H1.
<p>ANON-KSAR-N8YM-W;</p> <p>ANON-KSAR-NKAB-D</p>	<p>BSP support the provision of a policy compliant level of affordable housing, reflecting the continued need for affordable homes in the district.</p> <p>It is noted that for market led housing schemes, targets are provided for affordable housing provision based on First Homes and Social Rent. To ensure that the right type of affordable homes are delivered in the right locations, such targets should be applied flexibly based on local need and site specific circumstances. This will also ensure that the local plan is responsive to potential shifts or changes in local affordable housing need over the duration of the plan period.</p>	<p>Comments on First Homes are noted. The SHMA update has highlighted issues for First Homes and why they are not suitable in the Winchester context, and so this policy requirement has been removed.</p> <p>Proposed Change:</p> <p>Amend the first bullet point after the third paragraph and delete the third bullet point after the third paragraph on policy H6 as follows:</p> <ul style="list-style-type: none"> • 2535% as First Homes <u>low-cost home ownership</u>; and • The remainder as other affordable low cost home ownership (with priority given to homes for Shared Ownership) <p>The policy does allow for evidence of local needs to also be taken into account when considering tenure mix as and when sites come forward for development.</p>

<p>ANON- KSAR- NKME-V</p>	<p>National policy and local priorities in relation to affordable housing are likely to change during the lifetime of the plan. It is welcomed that the overall approach to affordable housing provision is being consulted upon, and that this has been subject to viability appraisal. However given a range of uncertainties, including a changing picture in terms of the cost of mitigation required to achieve nutrient neutrality, biodiversity net gain, and requirements in terms of energy efficiency and on-site energy generation, there remains a need for flexibility so that the policy can be effective over the full period of the plan.</p>	<p>Comments are noted.</p> <p>The Local Plan is informed by a viability assessment produced by professional consultants, using: a well-established methodology; tested through numerous examinations; and consistent with PPG principles; conducted through testing a mixture of site typologies and where appropriate more specific consideration of site allocation proposals that are intended to be key in supporting the planned delivery overall. Therefore, the level of achievable and viable affordable housing delivery has been established. The Viability Assessment is an iterative process and has been updated for the next stage of the Local Plan review process. This will also use the most up-to-date information and consider the implications of BNG in practice.</p> <p>Additionally, the policy can be varied on the basis of an independently assessed viability statement confirming the need to do so.</p>
<p>ANON- KSAR- N81F-E</p>	<p>Bargate Homes support the provision of a policy compliant level of affordable housing, reflecting the continued need for affordable homes in the district.</p>	<p>Comments on specific development costs are noted. These have been considered by the Council's viability</p>

	<p>Clearly housing affordability within Winchester Town is a growing issue. New housing at the edge of the settlement will be an important source of both market and affordable housing and should be pursued in order to address travel to work patterns and affordability issues, contributing significantly to the social and economic objectives and representing sustainable development, provided the sites are suitable for housing, as the opportunity at Salters Lane is.</p> <p>It is noted that for market led housing schemes, targets are provided for affordable housing provision based on First Homes and Social Rent. To ensure that the right type of affordable homes are delivered in the right locations, such targets should be applied flexibly based on local need and site specific circumstances. This will also ensure that the local plan is responsive to potential shifts or changes in local affordable housing need over the duration of the plan period.</p> <p>A review has also been undertaken of the Local Plan Viability Study – Interim Stage 1 Report (October 2022). The viability study is, necessarily, high level at this stage and we note the work will be built on during the Regulation 18 and Regulation 19 stages.</p> <p>Bargate Homes welcome the emerging conclusion the current target of 40% affordable housing district-wide is likely to be challenging in viability terms, given the cumulative financial impact of nutrient neutrality and LETI standards. The suggested differential approach to affordable housing provision is supported in principle but we consider this does not go far enough, particularly given the changed economic context since the study was commissioned. We consider that:</p> <p>The 50-unit mixed PDL typology tested is unviable in all scenarios at 30% AH at the upper end of the Benchmark Land Value range proposed.</p>	<p>consultants and the updated viability assessment sets out costs which are considered reasonable and appropriate given recent experience of development economics and the costs of mitigating planning impacts.</p>
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	<p>The BLV range for PDL is far too broad to draw meaningful viability conclusions and further evidence is required to support the emerging policy position.</p> <p>Viability also needs to be tested on greenfield sites at a BLV of £700,000 per hectare.</p> <p>The 5% allowance for LETI standards appears to be modest and further work is required to justify this.</p> <p>Similarly, the assumed nitrate and phosphate cost (£12k per dwelling) is modest. Viability should be tested at £15k per dwelling.</p> <p>Several of the standard viability appraisals inputs should be amended to reflect current and forecast market norms. In particular, viability should be tested on the assumption of:</p> <p>Developer's Profit – 20% of GDV on private sales (DSP assumption 17.5%) Development Finance – 7.5% (DSP assumption 6.5%) Contingency Allowance – 7.5% (DSP assumption 5%) Legal fees on sale - £1,000 per private unit (DSP assumption £750) Sales rate of 0.5 dwellings per outlet per week (DSP assumption unclear, but a delivery rate of 2.3 dwellings per week modelled at SJM Barracks).</p> <p>Accordingly, Bargate Homes consider it likely that AH provision of 25% will be challenging in certain scenarios and we will provide further commentary on viability during the Regulation 18 and Regulation 19 stages.</p>	
ANON-KSAR-N8XH-Q	Whilst I broadly support the proposals for Affordable Housing, the inclusion of Social Housing is needed.	Comments are noted –affordable housing is defined in Annex 2 of the NPPF and this includes social rent.

		The affordable tenure split in this policy is informed by the SHMA and ongoing viability work, and is considered to be the best approach.
ANON-KSAR-N8XP-Y	Time for really affordable housing that locals can afford!!!! Developers want to build expensive homes because they are more profitable- some even build a few affordable houses in a much cheaper location as a get out!!!	Comments are noted –affordable housing is defined in Annex 2 of the NPPF and this includes social rent. The affordable tenure split in this policy is informed by the SHMA and ongoing viability work, and is considered to be the best approach.
ANON-KSAR-N85J-P	<p>Bloor Homes support in principle the prioritisation of delivery affordable housing, however raise several concerns regarding the delivery due to the implications of other policies. The consultation document states in multiple locations that the delivery of affordable housing is key including in the Foreword which notes “we also face a challenge of affordability. It’s harder and harder for all ages, and especially younger people, to find a suitable house they can afford” (Paragraph 1.2) and on page 171 which states “the affordability of housing in Winchester district continues to be a major issue and therefore the delivery of affordable homes remains a critical priority of the new Local Plan” (Paragraph 9.31, emphasis added).</p> <p>Whilst it is noted that the standard methodology includes an uplift for affordability, the need in Winchester is so great that an uplift in housing numbers is also necessary to provide sufficient affordable dwellings over the Plan Period.</p> <p>The Winchester Strategic Housing Market Assessment (SHMA) was published by Icenl in February 2020 to form part of the evidence base of the new Winchester Local Plan. It is noted that this document could be considered out of date due to the significant economic changes since its publication, including inflation and increased interest rates. As the Local</p>	<p>The Council’s approach to the overall housing delivery is set out in the Housing Background paper and the responses to emerging Policy H1. This is informed by an updated SHMA.</p> <p>This also outlines the extent to which the Government’s “standard method” has already increased the housing requirement above and beyond that indicated by the population projections for district. There is therefore already a significant amount of additional housing included in the assessment of need which, together with a buffer to include a contribution for unmet needs arising in neighbouring authorities, includes a significant increase in growth in this area which will deliver additional affordable housing.</p>

	<p>Plan is not due for adoption until August 2024 at the earliest it would be at least four years old by this time. It is recommended that the SHMA should be updated to inform the Regulation 19 Draft Local Plan.</p> <p>Notwithstanding this, in relation to affordable housing the SHMA looks at need within the 17-year period from 2019 to 2036 (Paragraph 5.6).</p> <p>The methodology used to estimate the rented affordable housing need within the SHMA reviewed the following:</p> <ul style="list-style-type: none"> • Current need: an estimation of the number of households who have a need now; • Gross Need: Projected newly forming households in need based on projections with an affordability test, and estimating existing households that will fall into need; • Review of the supply of affordable housing based on the likely number that will become available from the existing social housing stock; and • Estimate of the overall need: subtracting the supply from the gross need and then converted into annual flows. <p>The SHMA states that there is a need for 220 new dwellings per annum to be provided, a total of around 3,750 over the 17-year period 2019-2036. These needs are for rented housing targeted at households who cannot afford to buy or rent in the open market (Paragraph 5.50).</p> <p>In relation to affordable home ownership products the SHMA established an estimate of the number of households living in the private rented sector (PRS) and assess the number of newly formed households which rent but which are looking to buy and may be impacted by barriers such as income, lack of deposit or difficulties obtaining a mortgage. The SHMA therefore concludes that there is a need for around 123 affordable home ownership dwellings per annum in the 2019-2036 period.</p>	<p>The scale and distribution of housing is addressed in the Development Strategy and Site Selection Background Paper.</p>
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	<p>Overall the SHMA states a requirement for 343 new affordable dwellings per annum in the plan period.</p> <p>It should be noted that this specifically relates to the number of new affordable dwellings required, as the existing supply of affordable dwellings from the likely number of homes that will become available from the existing social housing stock was already considered as part of the SHMA calculation.</p> <p>The SHMA therefore concludes: “The NPPF advises that at least 10% of all new housing on larger sites should be for affordable home ownership unless this would exceed the level of affordable housing required in the area and the evidence within this report is considered to provide sufficient evidence to justify this. However, given the clear and acute need for affordable rented housing, the Council should look to seek as much rented affordable products as possible (subject to viability)” (Page 48) (own emphasis added).</p> <p>Draft Policy H6 seeks affordable housing from development sites of 10 dwellings or more (or sites of over 0.5ha), requiring at least 40% provision on greenfield sites and 30% provision on previously developed land in recognition of the increased development costs. In the short term however, where development is required to mitigate the impact of additional phosphates on the River Itchen Special Area of Conservation (SAC), the proportion of affordable housing will be reduced to no less than 35% on greenfield sites and 25% on previously developed land subject to viability.</p> <p>The emerging Local Plan states a standard methodology requirement of 14,178 dwellings over the period 2019-2039, with an additional buffer of 1,450 dwellings, creating an overall requirement of 15,628 dwellings.</p>	
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	<p>In order to meet the SHMA requirement of 343 affordable dwellings per annum, this means affordable houses should make up over 43.9% of the Local Plan housing. The majority of this affordable housing should be within Winchester Town, as the SHMA identifies this is the area with the greatest need from existing households and newly formed households in the authority area.</p> <p>Draft Strategic Policy H2 states that the indicative phasing of the Plan will be as follows:</p> <ul style="list-style-type: none">• Approximately 4,700 dwellings (averaging 940 dwellings per annum) between 2019/20 and 2023/24• Approximately 5,150 dwellings (averaging 1,030 dwellings per annum) between 2024/25 and 2028/29• Approximately 3,610 dwellings (averaging 722 dwellings per annum) between 2029/30 and 2033/34• Approximately 2,160 dwellings (averaging 432 dwellings per annum) between 2034/35 and 2038/39 <p>In order to achieve the required 343 affordable rent and home ownership dwellings per annum this would require the following percentages:</p> <ul style="list-style-type: none">• 36.5% between 2019/20 and 2023/24• 33.3% between 2024/25 and 2028/29• 47.5% between 2029/30 and 2033/34• 79.4% between 2034/35 and 2038/39 <p>The percentages required to deliver the number of affordable homes between 2029/30-2038/39 are therefore significantly higher than the proposed draft Policy H6 requirements, and would likely not be achievable on the majority of development sites for reasons of viability.</p>	
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	<p>Furthermore the Regulation 18 Draft Plan states that no greenfield land will be released for development until 2030, meaning that before this date sites should only be required to deliver 25%-30% (depending on phosphates).</p> <p>Therefore overall across the plan period the quantum of affordable housing required to meet the demand in the District for both affordable rent and affordable home ownership will not be met by the current housing requirement and draft spatial development policies.</p> <p>However, this matter is exacerbated by the supply for the emerging Local Plan which is heavily reliant on existing commitments. Table H2 within the consultation document states that over 10,969 dwellings will be delivered through completions since the start of the Local Plan period (2019-2021), outstanding planning permissions, and other commitments such as previous Local Plan allocations.</p> <p>This accounts for over 70% of the overall provision, equivalent to all of the delivery required in the first ten-years of the plan. In order to provide the required affordable housing for this period (343 dpa x 10 years = 3,430) the existing sites would need to be delivering an average of 31.3% affordable housing.</p> <p>According to the recent Authority Monitoring Reports (AMRs) from 2019/20 and 2020/21 there are 37 major sites with planning consent that will be contributing to the Local Plan housing requirement from the base date of 2019. In total these sites will deliver 9,035 (although not all of this will be within the Plan Period as some completions occurred before 2019), with 7,956 net dwellings remaining on these sites according to the 2021/22 AMR.</p>	
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	<p>Of these sites five agreed off-site contributions for affordable housing, however the other developments averaged only 29.6% affordable housing (2,624 affordable housing from 8,878 total consented dwellings).</p> <p>In addition, the Local Plan commitments are also made up of small sites. According to recent AMRs there were 78 completions from small sites in 2019/2020 and 108 completions from small sites in 2020/21. The latest AMR also states that 487 dwellings are anticipated from small sites with planning permission in the new Local Plan Period.</p> <p>Therefore of the 10,969 dwellings committed in the Local Plan 673 dwellings will come forward on sites too small to deliver affordable housing, and the remaining will be delivered at a rate of around 29.6% affordable housing, therefore providing only 3,048 affordable dwellings, a shortfall of nearly 400 affordable dwellings for this period.</p> <p>Small sites which would by definition be too small to be required to provide affordable housing, also make the anticipated windfall delivery as stated in Table H3 of the Regulation 18 consultation (Page 166).</p> <p>Therefore from the 1,975 windfall development included in the Draft Plan none are anticipated to deliver affordable housing.</p> <p>Overall it can be calculated that only 3,048 affordable dwellings will be provided from completions since the start of the Local Plan Period, outstanding planning permissions, other commitments, and windfall developments, a delivery of approximately 24%.</p> <p>Given that these sources make up nearly 83% of the Local Plan housing provision (12,944 dwellings of 15,629) this falls significantly short of the 343 affordable dpa required in the District.</p>	
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The Local Plan states that only 2,685 dwellings are anticipated to come forward through new allocations rather than from existing commitments or windfall sites. However a further 3,554 affordable dwellings are required to meet the total affordable requirement detailed within the SHMA.

Therefore even if the allocations in the Local Plan provided 100% affordable housing this would still not be sufficient to fulfil the requirement for affordable housing.

The only way for the required affordable housing to be delivered is to increase the housing provision in Local Plan, and in turn increase the number of additional allocations made in the Local Plan. Based on the evidence base published in support of the Regulation 18 consultation:

- 343 affordable dwellings are required per annum across the Local Plan Period;
- This would require over 43.9% of the dwellings in the emerging Local Plan to be delivered as affordable housing;
- Of the 10,969 dwellings committed in the Local Plan only 3,048 will be affordable dwellings, due to sites size and signed Section 106 agreements. This equates to only 28%;
- From the 1,975 windfall development included in the consultation Plan approximately 1,329 are anticipated from small sites which would not deliver affordable housing;
- The remaining 2,658 dwellings to be allocated in the Local Plan do not provide sufficient affordable housing and;
- The Local Plan is anticipated to have a deficit of 2,700 – 2,900 affordable dwellings over the plan period.

The consultation document recognises affordability as a Key Issue in Paragraph 9.8, however the proposed spatial policies do not allow for the

	<p>required delivery of affordable dwellings. It is not a question of viability, but due to the way development has been planned, with a heavy reliance on existing commitments and small sites. Paragraph 9.35 of the emerging Local Plan states “It is likely the single largest source of supply for new affordable dwellings will be the proportion secured as part of larger market-led housing schemes”. The emerging Plan also acknowledges that a greater proportion of affordable housing can be achieved on greenfield sites, yet the emerging Local doesn’t allocate any new strategic greenfield sites. Bloor consider that Manor Parks is an optimal location to deliver a policy compliant level of affordable housing, in a sustainable location where affordable housing need is the most acute in the District, ensuring it provides a significant contribution to this identified shortfall.</p> <p>Further analysis of the above points is set out within the submitted (emailed) representations titled ‘Manor Parks Regulation 18 Representations’ and accompanying appendices.</p>	
ANON-KSAR-N83C-D	<p>We feel that the policy approach would be improved by seeking financial contributions for affordable housing on sites of 10 units or less, on a £ per sq m basis. This means that affordable needs are being address by all housing development, whilst also providing a mechanism for collecting funds to assist with delivering affordable housing. For example, paragraph 5.54 of the West Oxfordshire Local Plan 2018 sets out an affordable housing contribution of £100 per sq m, enabling the viability of small scale schemes and encouraging them to come forward, without providing a management problem of, say, just 4 affordable units out of 10. This is a sound and effective approach, which has passed examination by an Inspector.</p>	<p>Comments are noted, but this approach is not applicable in with Winchester Plan area, as it is not designated a rural area under the Housing Act 1985 and affordable housing can only be sought on market led sites of 10 dwellings or more.</p>
ANON-KSAR-N8VD-H	<p>However, as currently drafted, Policy H6 of the plan (which deals with affordable housing) does not accord with para 65 of the NPPF and applies to all developments in the district which increase the supply of housing by ten dwellings or more, irrespective of whether the scheme</p>	<p>Comments are noted – the exemptions in para 65 of the NPPF are extant regardless of inclusion</p>

	<p>seeks to provide housing for specific groups. Consequently, policy H6 does not accord with national planning policy and it needs to be redrafted accordingly.</p>	<p>within the policy; therefore, there is no need to amend the policy wording.</p>
<p>ANON-KSAR-N8VR-Y</p>	<p>The proportion allocated to First Homes/Affordable home ownership is too high. In terms of the goal to make affordable homes "available in perpetuity" would that be possible if the occupiers have the right to ownership (either in whole or in part)? The goal of "in perpetuity" is supported but the demand for properties in the affordable sector is for rented homes not those available for "ownership". In a recent exercise to find tenants for five affordable rent homes in Wickham, the Land Trust had applications from over 90 individuals/families. The proportion of rented affordable needs to be much higher than 65% - suggest 85 -90%</p>	<p>Comments on First Homes are noted. The SHMA update has highlighted issues for First Homes and why they are not suitable in the Winchester context, and so this policy requirement has been removed.</p> <p>Proposed Change:</p> <p>Amend the first bullet point after the third paragraph and delete the third bullet point after the third paragraph on policy H6 as follows:</p> <ul style="list-style-type: none"> • 2535% as First Homes<u>low-cost home ownership</u>; and • The remainder as other affordable low cost home ownership (with priority given to homes for Shared Ownership) <p>The policy has been revised and updated in line with the evidence set out in the 2024 SHMA update. It also allows for local evidence of needs to be considered in decisions on planning applications.</p>

<p>ANON- KSAR- N81U-W</p>	<p>The policy identifies that in the short-term an alternative approach will be applied whereby lower levels of affordable housing will be sought where development is required to mitigate the impact of additional phosphates. Greater clarity required regarding 'short-term' and when this will cease.</p>	<p>The supporting text notes that any significant changes relating to the affordability of mitigation will be reported in the Authority Monitoring Report. Should that indicate that the costs of mitigation have changed significantly then that may, after taking into account other costs and values at that time, indicate that the additional 5% reduction in affordable housing requirement (or a proportion thereof) is removed. The mechanism for this will be determined at that time, but could include inclusion in the next Local Plan or other non-statutory process. In any case, such a measure will need to be supported by a full viability assessment.</p>
<p>BHLF- KSAR- N8TT-Y</p>	<p>Affordable housing: object. The last data I saw showed that the income of some 25% of households nationally was insufficient to enter the private housing market, to rent or to buy. The percentage is probably different for Winchester. The plan fails to cater for these households for whom even the "affordable" element of the additional housing provision will be out of reach.</p>	<p>Comments are noted - the definition of affordable housing is outlined within Annex 2 of the NPPF National Planning Policy Framework.</p> <p>The policy is informed by the evidence in the SHMA update, which outlines the needs for a variety of types of housing including low cost home ownership. The mix of housing proposed is considered to be the best approach to maximise delivery of the number of units.</p>

<p>BHLF- KSAR- N8RP-S</p>	<p>Supports the policy provision for reduction on brownfield land; flexibility in areas affected by nutrient neutrality; and the increase in provision where nutrient mitigation reduces. Consider removing wording “in the short term” on the basis of sewerage companies’ system upgrades to account for nutrient pollution.</p> <p>Requests the Council reconsider whether First Homes is affordable across the district, and therefore to deliver a justified and effective policy whether it could be removed to better meet the national policy requirement for housing proposals to contribute to creating mixed and balanced communities.</p> <p>The policy expectation that rent levels are maintained up to the maximum LHA level is not constructive, as this unnecessarily fetters Registered Providers’ ability to increase rent across a development’s lifetime in line with national policy and inflation and should be removed.</p> <p>The policy refers to retaining all affordable housing in perpetuity; however this term is not universal in the NPPF glossary definition of affordable housing and should be removed.</p>	<p>It is considered helpful to retint he words “in the short term” as this correctly outlines the council’s expectation that such reductions in affordable housing expectations will only apply while the costs of nutrient mitigation remain at this level. The policy wording indicates to landowners that these expectations will change as nutrient mitigation costs decrease, which is considered helpful and appropriate in ensuring that the potential costs of affordable housing are well known and understood by all parties as sites come forward.</p> <p>Comments on rent levels are noted. Following consideration and discussion with housing colleagues, it is proposed to amend criterion iv of Policy H6 as follows:</p> <p>Comments on First Homes are noted. The SHMA update has highlighted issued for First Homes and why they are not suitable in the Winchester context, and so this policy requirement has been removed.</p> <p>Proposed Change:</p>
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		<p>Amend second bullet point following fourth paragraph of Policy H6 as follows –</p> <p>At least 65% as Social Rent or Affordable Rent (with rent levels being priced and maintained at levels which are in the range from a Living Rent up to the a maximum of the Local Housing Allowance level <u>or 80% of market rent where the percentage of affordable housing on site exceeds the required level under this policy). Rent levels different from this requirement should be agreed via an evidenced based viability assessment)</u> ; and</p>
<p>BHLF- KSAR- N86N-U</p>	<p>We welcome the emerging conclusion the current target of 40% affordable housing district-wide is likely to be challenging in viability terms, given the cumulative financial impact of nutrient neutrality and LETI standards. The suggested differential approach to affordable housing provision is supported in principle but we consider this does not go far enough, particularly given the changed economic context since the study was commissioned. We consider that:</p> <ul style="list-style-type: none"> •The 50-unit mixed PDL typology tested is unviable in all scenarios at 30% AH at the upper end of the Benchmark Land Value range proposed. The BLV range for PDL is far too broad to draw meaningful viability conclusions and further evidence is required to support the emerging 	<p>Comments on specific development costs are noted. These have been considered by the Council's viability consultants and the updated viability assessment sets out costs which are considered reasonable and appropriate given recent experience of development economics and the costs of mitigating planning impacts.</p> <p>As stated within the policy, affordable housing should be “indiscernible from,</p>

	<p>policy position.</p> <ul style="list-style-type: none"> • Viability also needs to be tested on greenfield sites at a BLV of £700,000 per hectare. • The 5% allowance for LETI standards appears to be modest and further work is required to justify this. • Similarly, the assumed nitrate and phosphate cost (£12k per dwelling) is modest. Viability should be tested at £15k per dwelling. • Several of the standard viability appraisals inputs should be amended to reflect current and forecast market norms. In particular, viability should be tested on the assumption of: <ul style="list-style-type: none"> o Developer's Profit – 20% of GDV on private sales (DSP assumption 17.5%) o Development Finance – 7.5% (DSP assumption 6.5%) o Contingency Allowance – 7.5% (DSP assumption 5%) o Legal fees on sale - £1,000 per private unit (DSP assumption £750) o Sales rate of 0.5 dwellings per outlet per week (DSP assumption unclear, but a delivery rate of 2.3 dwellings per week modelled at SJM Barracks). <p>We consider it likely that AH provision of 25% will be challenging in certain scenarios and we will provide further commentary on viability during the Regulation 18 and Regulation 19 stages.</p> <p>The policy should also acknowledge that management requirements for affordable homes influences the location and design and should be supported in appropriately scaled clusters, integrated with the wider development.</p>	<p>well integrated with and dispersed throughout the market housing". This does not prevent clusters where appropriate for management or other relevant reasons.</p>
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Comments which didn't answer H6 - affordable housing		
Respondent number	Comment	Officer comment
BHLF- KSAR- N8T2-W	I am very much in agreement with the response of Olivers Battery Parish Council. I especially agree with their comments regarding Affordable housing (policy H6)	Comments are noted.
BHLF- KSAR- N8RJ-K	<p>Supports policy but has concerns that the policy wording creates a lack of certainty where developments are required to mitigate the impact of additional nitrates and phosphates on the River Itchen SAC. The proposal to reinstate a higher requirement in future if the costs of nutrient-related mitigation reduce is not likely to be workable and effective.</p> <p>It is not clear how changes in cost would be measured and monitored in-practice, and therefore it is uncertain that schedules in a Section 106 Agreement would provide an effective 'value capture' mechanism for purposes envisaged.</p> <p>Instead, it is suggested that the affordable housing tariff is simply set at 25% and 35% with this matter being revisited within 5-years of the Plan's adoption, when WCC will undertake a review of the Plan.</p> <p>To off-set the shortfall in affordable housing, the Local Plan should increase the overall housing requirement allocate additional land for development.</p> <p>Furthermore, the Plan should be revised to allocate additional sites that have the potential to provide on-site nutrient mitigation. Land South of Titchfield Lane is one such site and therefore merits proper</p>	<p>The supporting text notes that any significant changes relating to the affordability of mitigation will be reported in the Authorities Monitoring Report. Should that indicate that the costs of mitigation have changed significantly then that may, after taking into account other costs and values at that time, indicate that the additional 5% reduction in affordable housing requirement (or a proportion thereof) is removed. The mechanism for this will be determined at that time, but could include inclusion in the next Local Plan or other non-statutory process. In any case, such a measure will need to be supported by a full viability assessment.</p> <p>The Council's approach to the overall housing delivery is set out in the Housing Background paper and the responses to emerging Policy H1.</p>

	consideration, as it could provide nutrient mitigation as an integral part of the scheme design, without significant impacts on build costs. It would therefore also be possible to provide 40% affordable housing, in accordance with the proposed policy requirement.	
BHLF- KSAR- N8RU-X	Affordable housing – A special note is needed on this topic; definitions are something of a linguistic jungle. We do not have sufficient expertise to judge these but ask that WCC clearly spells out what its priorities are and what it is actually doing, especially regarding social or affordable rented housing, let by the local authority or private, registered providers, which could be the highest priority in view of high local housing prices.	<p>Comments are noted – the policy is necessarily technical as it set out the councils; expectations for the delivery of affordable housing on larger market-led housing schemes. Further information on the Council’s priorities is set out in the Council’s housing strategy. However, it is considered appropriate to clarify in the policy how the affordable housing element of larger schemes should be delivered.</p> <p>Proposed Change:</p> <p>Add the following sentence to the end of the sixth paragraph of Policy H6 –</p> <p><u>Provision should be by a Registered Provider (regulated by the Regulator of Social Housing), unless otherwise agreed.</u></p>
BHLF- KSAR- N87Z-8	Affordable Housing provides the latest policy response to the ‘key priority’ identified earlier in the Draft Local Plan. The challenge of providing sufficient levels of affordable housing to meet needs arising within Winchester district and at Winchester Town specifically has been a long established and chronic problem that remains unresolved.	The Council’s approach to the overall housing delivery is set out in the Housing Background paper and the responses to emerging Policy H1. This also outlines the extent to which the Government’s

	<p>Reference to past rates of delivery compared to need is illuminating:</p> <p>The delivery of affordable housing across the district over the last decade has fallen significantly short of the Council’s own published SHMA requirement (although it is notable that delivery has improved in recent years as the MDA allocated within the adopted development plan are being built out) and has failed to respond adequately to need. The table above shows that not once in the preceding ten-year period has the policy objective of 40% been achieved, which is a clear demonstration that the policies pursued by the Council have not been effective.</p> <p>The Council began examining affordable housing delivery against the adopted spatial strategy in its 2020/21 AMR, as a consequence there is currently only one year of data to analyse: this shows the MDAs (policies W2, SH2 and SH3) delivered 158 of the 300 affordable homes constructed that year, 53% of the affordable housing completions in the district.</p> <p>Across the three MDAs an average of 43% of new homes delivered have been affordable, compared to just 22% at Winchester Town, and 36% within the MTRA24 demonstrating clearly the comparative effectiveness of the MDA strategy.</p> <p>The paragraphs preceding Policy H6 recognise and assess the problems faced by those trying to access the housing market in Winchester and note at paragraph 9.31 that the affordability of housing in Winchester district continues to be a major issue..therefore the delivery of affordable homes remains a critical priority. These statements naturally beg the question: what therefore does the Council propose to do about this issue in policymaking terms that</p>	<p>”standard method” has already increased the housing requirement above and beyond that indicated by the population projections for district. There is therefore already a significant amount of additional housing included in the assessment of need which, together with a buffer to include a contribution for unmet needs arising in neighbouring authorities, includes a significant increase in growth in this area which will deliver additional affordable housing.</p> <p>The emerging development strategy does include significant development in Winchester Town, including a large strategic site at Sir John Moore Barracks.</p>
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	<p>differs from the measures that have been taken before that have demonstrably failed to resolve the major/critical issue that the Council recognises and classifies as a 'key priority' it must tackle through the policies of this new Local Plan?</p> <p>The supporting text notes that viability has proved to be a significant challenge in the past meaning that many schemes that were relied upon to deliver housing as components of the overall housing strategy failed to do so.</p> <p>The Plan recognises that small housing sites and previously developed sites²⁶ identified for residential use are subject to greater challenges in respect of their viability and so are less likely to deliver affordable housing, or to do so in quantities that meet the overall policy requirement. In the face of a deepening affordability crisis, it naturally calls into question the Council's continuing over-reliance on windfall sites as a key component of the proposed housing delivery strategy. In the case of Winchester Town windfalls are the second largest delivery component behind the already committed Barton Farm/Kings Barton MDA. Such a strategy offers little prospect of the Council's policy on affordable housing requirements being met (as past evidence demonstrates).</p> <p>The Draft Plan recognises that the main sources of affordable housing supply will be from larger market-led developments where the viability of provision is more assured²⁷ and the evidence provided above bears this out.</p> <p>Having regard to the foregoing this demonstrates in compelling fashion why the Council should re-think its overall strategy and commit to delivering MDA scale growth at Winchester Town where affordability is most challenging and where the opportunity exists to</p>	
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	<p>most effectively address the priorities that the Council has identified as objectives for the Local Plan – the climate emergency and the affordability of housing. The two are inextricably linked and should be tackled by a positive and proactive planning policy framework with focussed strategic scale growth at Winchester Town.</p> <p>Vistry and Taylor Wimpey are able to commit to achieving full policy compliance in respect of affordable housing delivery if their land interests at North Winchester are incorporated into the Local Plan.</p>	
<p>BHLF- KSAR- N8ZD-N</p>	<p>Supports policy but has concerns that the policy wording creates a lack of certainty where developments are required to mitigate the impact of additional nitrates and phosphates on the River Itchen SAC. The proposal to reinstate a higher requirement in future if the costs of nutrient-related mitigation reduce is not likely to be workable and effective.</p> <p>It is not clear how changes in cost would be measured and monitored in-practice, and therefore it is uncertain that schedules in a Section 106 Agreement would provide an effective ‘value capture’ mechanism for purposes envisaged.</p> <p>Instead, it is suggested that the affordable housing tariff is simply set at 25% and 35% with this matter being revisited within 5-years of the Plan’s adoption, when WCC will undertake a review of the Plan.</p> <p>To off-set the shortfall in affordable housing, the Local Plan should increase the overall housing requirement allocate additional land for development.</p>	<p>The supporting text notes that any significant changes relating to the affordability of mitigation will be reported in the Authorities Monitoring Report. Should that indicate that the costs of mitigation have changed significantly then that may, after taking into account other costs and values at that time, indicate that the additional 5% reduction in affordable housing requirement (or a proportion thereof) is removed. The mechanism for this will be determined at that time, but could include inclusion in the next Local Plan or other non-statutory process. In any case, such a measure will need to be supported by a full viability assessment.</p> <p>The Council’s approach to the overall housing delivery is set out in the Housing Delivery Background paper and the responses to emerging Policy H1.</p>

<p>BHLF- KSAR- N8ZZ-B</p>	<p>Draft Policy H6 seeks affordable housing from development sites of 10 dwellings or more (on sites of over 0.5ha), requiring at least 40% provision on greenfield sites and 30% provision on previously developed land in recognition of the increased development costs. In the short term however, where development is required to mitigate the impact of additional phosphates on the River Itchen Special Area of Conservation (SAC), the proportion of affordable housing will be reduced to no less than 35% on greenfield sites and 25% on previously developed land subject to viability.</p> <p>The emerging Local Plan states a standard methodology requirement of 14,178 dwellings over the period 2019-2039, with an additional buffer of 1,450 dwellings, creating an overall requirement of 15,628 dwellings.</p> <p>In order to meet the SHMA requirement of 343 affordable dwellings per annum, this means affordable houses should make up over 43.9% of the Local Plan housing.</p> <p>Draft Strategic Policy H2 states that the indicative phasing of the Plan will be as follows:</p> <ul style="list-style-type: none"> ▪ Approximately 4,700 dwellings (averaging 940 dwellings per annum) between 2019/20 and 2023/24 ▪ Approximately 5,150 dwellings (averaging 1,030 dwellings per annum) between 2024/25 and 2028/29 ▪ Approximately 3,610 dwellings (averaging 722 dwellings per annum) between 2029/30 and 2033/34 ▪ Approximately 2,160 dwellings (averaging 432 dwellings per annum) between 2034/35 and 2038/39 <p>In order to achieve the required 343 affordable rent and home ownership dwellings per annum this would</p>	<p>The Council's approach to the overall housing delivery is set out in the Housing Background paper and the responses to emerging Policy H1. This also outlines the extent to which the Government's "standard method" has already increased the housing requirement above and beyond that indicated by the population projections for district. There is therefore already a significant amount of additional housing included in the assessment of need which, together with a buffer to include a contribution for unmet needs arising in neighbouring authorities, includes a significant increase in growth in this area which will deliver additional affordable housing.</p> <p>The Council's own housing build strategy sets out its proposals for additional housing to help meet affordable housing needs.</p>
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	<p>require the following percentages:</p> <ul style="list-style-type: none"> ▪ 36.5% between 2019/20 and 2023/24 ▪ 33.3% between 2024/25 and 2028/29 ▪ 47.5% between 2029/30 and 2033/34 ▪ 79.4% between 2034/35 and 2038/39 <p>The percentages required to deliver the number of affordable homes between 2029/30-2038/39 is therefore significantly higher than the proposed draft Policy H6 requirements and would likely not be achievable on the majority of development sites for reasons of viability.</p> <p>Therefore, overall, across the plan period the quantum of affordable housing required to meet the demand in the District for both affordable rent and affordable home ownership will not be met by the current housing requirement and draft spatial development policies.</p> <p>The only way for the required affordable housing to be delivered is to increase the housing provision in Local Plan, and in turn increase the number of additional allocations made in the Local Plan.</p> <p>Affordability The affordability ratio for Winchester it is currently 14.14 which is in the highest 40 authorities in the country (330 in total) and is in the highest 20 authorities outside of London. The issue of affordability is recognised within the Regulation 18 Consultation document, which states: “We also face a challenge of affordability. It’s harder and harder for all ages, and especially younger people, to find a suitable house they can afford”, (Foreword – Paragraph 1.2), and it is listed as a ‘Key Issue’ in Paragraph 9.8.</p> <p>The Local Plan is not due for adoption until August 2024 at the</p>	
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	<p>earliest, based on the currently published Local Development Scheme (July 2021), and the current Regulation 18 consultation is already behind schedule. Therefore, it is highly likely that the affordability ratio will increase prior to adoption of the draft Local Plan, and this would result in the publication of a higher standard methodology figure for Winchester.</p> <p>Therefore, whilst the use of the standard method is welcomed and supported in the draft Local Plan, there should be more emphasis that this is a minimum figure, and an uplift should be included as set out within the PPG. This uplift should in part reflect the poor affordability in Winchester, which is likely to increase as we enter times of current economic uncertainty and rising interest rates.</p>	
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Comments from other topics		
ANON-KSAR-NKYT-Q	Only social housing should be permitted either for re-purposing of existing buildings, whether originally classified for housing or not. Affordable housing is NOT affordable in any part of Winchester District, rural, suburban or urban and should not be permitted.	The updated SHMA sets out the needs for various types of housing which the local plan is expected to address. That include affordable housing.
ANON-KSAR-NK1Z-N	Shedfield Parish Council The requirement to meet Local Need is acknowledged, however these sites are often being developed with no real requirement for those with links to the area.	Comments are noted – the Council’s Lettings Policy and the Hampshire Home Choice Allocations Framework provides further details regarding lettings and how this works, whereby at para 11.1 (4) states a requirement for consideration is to have a local connection

	Recommendations	Officer response
Comments from SA	None	
Comments from HRA	None	

Policy H6 Affordable housing

Amendments to policy

In order to help meet affordable housing needs, all development which increases the supply of housing by 10 dwellings or more (or is on sites of over 0.5 hectares) will be expected to provide at least

- i. 40% of the gross number of dwellings as affordable housing.
- ii. On previously developed land, in recognition of the increased development costs including costs of land, the proportion of affordable housing will be no less than 30%.

In the short term, where development is required to mitigate the impact of additional phosphates on the River Itchen SAC (see policy NE16), the proportion of affordable housing will be reduced to no less than

- iii. 35% on greenfield sites
- iv. 25% on previously developed land.

All affordable housing will be secured by use of a s106 agreement, which should include a requirement to increase of provision of affordable housing up to the 40% overall target (30% for previously developed sites) if the costs of nitrate and phosphate mitigation reduces significantly.

For market led housing schemes, the affordable housing should be provided in accordance with the following proportions:

- v. ~~25~~**35%** as ~~First Homes~~**low-cost home ownership**; and
- vi. ~~At least 65% as Social Rent or Affordable Rent (with rent levels being priced and maintained at levels which are in the range from a Living Rent up to the a maximum of the Local Housing Allowance level~~ **or 80% of market rent where the percentage of affordable housing on site exceeds the required level under this policy). Rent levels different from this requirement should be agreed via an evidenced based viability assessment)** ; and
- vii. ~~The remainder as other affordable~~ **low cost** home ownership (with priority given to homes for Shared Ownership)

Affordable housing should be provided on-site, indiscernible from, well integrated with and dispersed throughout the market housing, unless off-site provision would better meet priority housing needs and support the creation of inclusive and mixed communities.

Affordable housing should remain available in perpetuity. **Provision should be by a Registered Provider (regulated by the Regulator of Social Housing), unless otherwise agreed**

Where schemes do not provide the full level of affordable housing expected, as set out above in this policy, applicants will be required to submit an 'open book' viability assessment that sets out how the particular circumstances justify the need for viability assessment and why an exception to policy should be made. In such cases, the council will commission if necessary an independent review of the submitted viability study, for which the applicant will bear the cost. Such proposals will only be acceptable where the viability case is accepted by the council, and it has been demonstrated that the maximum viable level of affordable housing is provided, and the approach contributes towards creating mixed and balanced communities.

Developments that seek to avoid the requirements of this policy by failing to make efficient use of land or by artificially subdividing land into smaller sites will not be permitted.