# HOMES FOR ALL





















## BACKGROUND

#### 9.1

One of the aims of the Council Plan is to provide 'Homes for All' and the Government has also made it very clear that it wants to boost the supply of new homes, to about 300,000 homes per annum nationally. Local plans are required to be based on evidence and to identify and plan for the various housing needs arising. It is also very important to deliver the right types and sizes of homes, including affordable homes, in locations that are sustainable. A significant amount of development is already planned in Winchester District and the minimum amount of additional housing that is required in the future will be set by the Government.



## 9.2

Various key evidence studies have been undertaken in relation to housing issues affecting the district:

- Future Local Housing Need and Population Profile Assessment (2020)
- Winchester District Strategic Housing Market Assessment (2020)
- Settlement Hierarchy Review (2021 and 2022)
- Assessment of Windfall Trends and Potential (2021)
- Strategic Housing and Employment Land Availability Assessment (2021)
- Winchester Local Plan Viability Assessment
- Gypsy and Traveller Accommodation Assessment
- Brownfield Register (2021)



#### 9.3

The number of homes that are needed is an important and often controversial issue (the term 'dwelling' is often used as it covers houses, flats and specialist accommodation). The minimum housing requirement for the district is set by Government, based on a 'Standard Method' which is calculated taking account of expected future household growth and local housing affordability. These factors can change annually and the Government has also proposed a more fundamental review of the Standard Method, although it does not currently seem to be taking this forward, so the Local Plan is currently based on the 'Standard Method' of calculating a housing figure.

#### 9.4

The 'Future Local Housing Need and Population Profile Assessment' estimates what the Standard Method requirement will be at the point at which it can be fixed (when the Local Plan is submitted to be examined by an Inspector). This concluded the Council should plan for a district-wide housing need of 664 dwellings per annum and the current (March 2022) Standard Method figure is 715 dwellings per annum. The Strategic Housing Market Assessment (SHMA) assesses in detail the various types and sizes of homes that will be needed, and the Gypsy and Traveller Accommodation Assessment (GTAA) establishes the need for homes for gypsies, travellers and travelling showpeople.

## 9.5

The scope to use existing Local Plan allocations and planning consents to meet future housing requirements has been assessed, as well as the potential for the use of 'previously developed land' (Brownfield Land Register 2021) and windfall development (as defined in the Assessment of Windfall Trends and Potential 2021). This enables the Local Plan to identify and plan for any shortfall between the housing needed and existing 'commitments'. The Council undertakes regular 'calls for sites' and these are recorded in the Strategic Housing and **Employment Land Availability Assessment** (SHELAA), the most recent being in 2021. The SHELAA documents landowners' or developers' aspirations as to which sites they would like the Council to allocate for development in the new Local Plan, but not all the SHELAA sites will be needed. Inclusion in the SHELAA does not mean a site is considered by the council as suitable for development or will be allocated.

### 9.6

The Local Plan sets out a development strategy based on a sustainable settlement hierarchy (informed by the Settlement Hierarchy Review). Sites have been selected for allocation based on whether they would help deliver the Local Plan strategy, an assessment of their benefits and impacts (including Sustainability Appraisal and viability assessment) and whether they can provide the types of housing needed in various locations.



9.1 9.6

## HOW WILL THIS TOPIC HELP DELIVER THE LOCAL PLAN VISION?

#### 9.7

The Local Plan Vision includes a commitment to address the needs of the area and sets out the future sought for the various communities in it. Additional housing in the right location can improve the sustainability of communities, including the regeneration of brownfield land, enhancing the viability of services such as shops and improving community cohesion through providing a range of housing to meet various needs.

# What are we aiming to achieve



- To provide adequate homes to meet the variety of expected housing needs over the Local Plan period up to 2039, in terms of quantity, type and tenure
- To maintain an adequate housing supply over the Plan period, including meeting the national 'Housing Delivery Test' and maintaining at least 5 years' supply of deliverable housing land
- To ensure that housing is distributed so as to help achieve sustainable development, combining economic, social and environmental aims
- To set out clear requirements for new residential development in terms of affordable housing provision, housing mix, and the provision of specialist types of housing.

## Key Issues:

#### 9.8

A number of key issues relating to the Homes for All topic were identified in the Strategic Issues and Priorities consultation document (SIP), published in February 2021. In particular, four possible 'spatial distribution' options were set out, looking at alternative ways of provided the level of housing likely to be needed. Comments were invited on these options and on a series of questions which aimed to elicit views on other key issues, identified as:

- i. 'Homes for All' is a key element of the Council Plan and Winchester 2030 Vision;
- Housing affordability and the effect on development viability and infrastructure provision;
- iii. Increasing the supply of new homes to meet the Standard Method need, with a significant amount of development already planned:

- iv. Addressing climate change, including the types of houses and where they are located;
- v. Providing housing for all sectors of community (e.g. young people, older persons' housing, care accommodation, 'self and custom build');
- vi. Meeting the accommodation needs of gypsies, travellers and travelling showpeople;
- vii. The role of community-led housing and the planning policies needed to provide it;
- viii. Delivering the right types and sizes of homes in the locations that meet the needs of the district;
- ix. Prioritising brownfield / previously developed land before determining how much greenfield land is released for development.



## HOW WILL THIS TOPIC HELP DELIVER THE LOCAL PLAN VISION?

#### 9.9

The Strategic Issues and Priorities consultation document (SIP) set out four possible 'spatial distribution' options:

#### 9.10

Approach 1 received the most support. It performed well in terms of its potential to support existing settlements, use of brownfield sites and reducing the need to travel. Approaches 2 and 4 were also fairly well-supported. Approach 3 received substantial objection and its promotion of large-scale greenfield development is at odds with priorities of maintaining the viability of existing centres, reducing travel and carbon emissions, and making best use of brownfield land.

#### 9.11

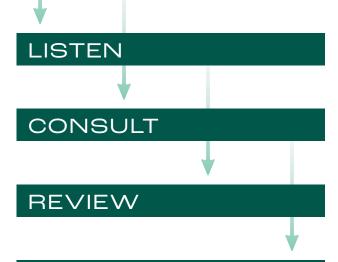
The Local Plan is required to plan for at least the level of housing established using the Standard Method, and to take account of the housing needs of other authorities that cannot meet their own needs in full. It is for the Local Plan to establish a sustainable strategy for accommodating this development. Taking account of the response to the SIP consultation, Sustainability Appraisal of the options, the evidence base and updated information on housing requirements and supply, the approach proposed below has been developed, based on Approach 1 but updated and modified to include elements of Approaches 2 and 4.

#### 9.12

The evidence base (in particular the Winchester District Strategic Housing Market Assessment) confirms the scale of need for the various types of housing. In addition, the National Planning Policy Framework (NPPF) requires that 10% of the overall number of homes provided on larger sites should be an affordable home ownership product. 'First Homes' are now

## **OPTIONS**

- Approach 1: A development strategy based on the approach in the existing Local Plan of distributing development to a sustainable hierarchy of settlements
- Approach 2: To focus development on Winchester itself and other larger and more sustainable settlements
- Approach 3: A strategy that includes one or more completely new strategic allocations or new settlements
- Approach 4: A strategy of dispersing development around the district largely in proportion to the size of existing settlements



## **UPDATE**

the Government's preferred discounted market tenure, with a requirement that these form at least 25% of all affordable housing delivered by developers through planning obligations. The remaining types of affordable housing to be delivered can be determined by the Local Plan, which can also change the minimum discount required for First Homes and set eligibility criteria.



## HOUSING PROVISION

#### 9.13

The Local Plan must allocate enough land to accommodate the area's housing needs and to meet the needs of specific groups (e.g. affordable housing, homes for older people and the needs of gypsies and travellers). Housing is also required to ensure that communities remain sustainable, that local needs in terms of housing mix and range of tenures are met and that the district can maintain its economic vitality.

#### 9.14

The Government has made it very clear that it wants to boost the supply and delivery of new homes and it expects the 'Standard Method' to be used as the starting point to set the housing requirement for the district. In addition, the 'Duty to Cooperate' requires that account is taken of any needs that cannot be met by neighbouring areas in establishing the housing requirement. These requirements should be the basis for the Local Plan unless there is clear evidence of a lack of suitable and available sites. The Standard Method calculation changes annually, with the position at March 2022 being as follows:

Table H1 – Standard Method Annual Need

Years of Plan Period	Standard Method Need	x Number of Years
2019-2020	666	666 x 1 = 666
2020-2021	692	692 x 1 = 692
2021-2022	665	665 x 1 = 665
2022-2039	715	715 x 17 = 12,155
Total		14,178

#### 9.15

The Standard Method need is therefore currently 14,178 dwellings for the District over the Local Plan period to 2039 (see Table H1 above). Within southern Hampshire there are a number of authorities that appear unable to meet their Standard Method housing need in full that may ask the City Council to assist under the Duty to Cooperate. The Partnership for South Hampshire (PfSH) is working to establish the scale of any shortfall in provision and to develop a Joint Strategy to address this, but this has not been completed in time to inform this draft Local Plan. Therefore a 'buffer' of about 1,450 dwellings is provided to cater for potential future increases in the Standard Method and, in the spirit of cooperation required by government policy, to help contribute towards the PfSH shortfall.



9.9

## HOUSING PROVISION

#### 9.16

When assessing how much of the housing growth the council has to plan for needs to be provided on new site allocations in this Plan, the amount of housing already in the pipeline is taken into consideration. There are a large number of sites which already have consent for residential development, some of which have been completed since the start of the Local Plan period (2019), or which are allocated by the existing Local Plan but have not yet been developed. The evidence also shows that 'windfall' development (sites that have not been previously allocated by local plans but come forward for development) makes a substantial contribution to housing provision and that this will continue (Assessment of Windfall Trends and Potential 2021). These commitments and

windfall sites will continue to deliver the existing Local Plan's spatial strategy for the district over much of the plan period, especially as the three 'strategic allocations' continue to be built out: Berewood (West of Waterlooville, including Newlands), Kings Barton (Barton Farm) and North Whiteley.

#### 9.17

This Local Plan therefore carries forward the existing Local Plan's spatial strategy to an extent, but evolves this to provide for future housing needs in those locations which are the most sustainable and which can best meet the district's needs. Table H2 below illustrates the overall position in terms of housing need and supply for Winchester District.

Table H2 – Housing Need and Provision

Winchester District Housing Need			
Standard Method need for Plan period 2019-2039 (715 x 20 years)	14,178		
'Buffer' (for Standard Method changes / unmet need in neigh- bouring authorities)	1,450		
Total Housing Requirement	15,628		

Winchester District Housing Provision				
Completions since start of Local Plan period (2019-2021)	1,517			
Outstanding planning permissions	8,560			
Other Commitments (previous Local Plans incl. SDNP)	892			
Windfall development	1,975			
Additional allocations made in this Local Plan	2,685			
Total Housing Provision *	15,629			

<sup>\*</sup> Includes 500 dwellings within South Downs National Park part of Winchester District, as agreed with South Downs National Park Authority.



#### 9.18

Table H2 shows that sufficient housing provision is proposed to meet the Winchester District housing requirement, which includes 500 dwellings within the South Downs National Park part of the district and a 'buffer' of 1,450 dwellings in case of changes to the Standard Method or as a contribution towards the unmet needs of neighbouring areas in South Hampshire. Some 64% of the requirement is met by dwellings that have either been completed or which already have planning consent. A further 12% are expected from windfall development over the Plan period and this is based on cautious assumptions derived from the Assessment of Windfall Trends and Potential 2021. Therefore, less than 25% of provision is from Local Plan allocations (either carried forward or new), giving a high level of certainty over the delivery of this additional housing.

#### 9.19

As a result it is not necessary to include a 'buffer' to allow for non-delivery, especially given the high levels of housing provision expected in the early years of the Plan period. If issues arise with delivery of the additional housing these can be addressed through the phasing provisions of this Plan or future updates or reviews of the Plan, which are required to be carried out every 5 years.

# Strategic Policy H1

## **Housing Provision**

Housing will be permitted to provide for the scale, types and tenures of housing needed in the district over the Local Plan period (2019-2039), including a contribution towards the unmet needs of adjoining areas. Provision is made for the development of about 15,620 dwellings (net) in this period, by prioritising suitable previously-developed land within defined settlement boundaries, completion of strategic allocations at Kings Barton (North Winchester), Berewood (West of Waterlooville, including Newlands) and North Whiteley, and delivery of sites allocated within and adjoining the

most sustainable settlements, in accordance with the Local Plan's spatial strategy (set out in Policy SP2).

Housing development will be distributed between the three spatial areas as follows:

- i. Winchester Town5,670 dwellings
- ii. South Hampshire Urban Areas5,700 dwellings
- iii. Market Towns and Rural Area4,250 dwellings (of which 500 to be delivered in the South Downs National Park Local Plan area)



9.19

## HOUSING PROVISION

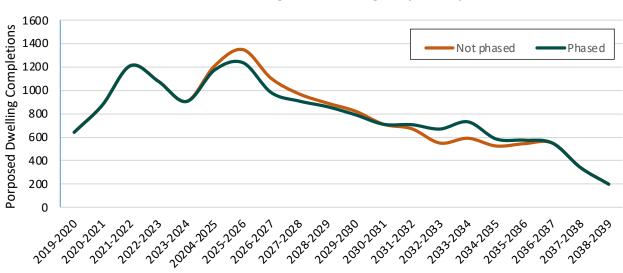
#### 9.20

Policy SP2 sets out the development strategy for the district and Policy H1 sets out how this will be achieved in terms of housing provision. The total provision of about 15,620 dwellings relates to Winchester District. The Council has agreed with the South Downs National Park Authority that about 500 dwellings will be provided within the National Park part of the district, which will come forward through the existing South Downs Local Plan (which covers the period to 2033) or a subsequent review.

#### 9.21

A large part of the housing supply benefits from planning consent, or has already been completed. Allowance is also made for windfall development, which the evidence expects to be a reliable source of housing supply. There is no scope to phase these elements of the housing supply, so it is expected that most housing from these sources will be developed in the first half of the Local Plan period (2019-2029). The strategic allocations, along with new allocated sites and some windfall provision, will continue to be built out into the second half of the Plan period, but it is necessary to phase the greenfield allocations towards the latter parts of the Plan period so as to maintain a reasonable level of provision in these phases and prevent all housing provision from being built out in the early years of the Local Plan.

## Effect of Phasing on Housing Trajectory



## **Strategic Policy H2**

## Housing Phasing and Supply

About 15,620 dwellings (net) will be provided within the district during the Plan period (2019-2039), with indicative phasing as follows:

- i. Approximately 4,700 dwellings (averaging 940 dwellings per annum) between 2019/20 and 2023/24
- ii. Approximately 5,150 dwellings (averaging 1,030 dwellings per annum) between 2024/25 and 2028/29
- iii. Approximately 3,610 dwellings (averaging 722 dwellings per annum) between 2029/30 and 2033/34
- iv. Approximately 2,160 dwellings (averaging 432 dwellings per annum) between 2034/35 and 2038/39

Phasing will be applied as set out in the relevant site allocation policies. so as to prioritise the development of previously developed land and achieve a suitable housing trajectory. by holding back most allocated greenfield sites until the later parts of the Plan period. Sites will not be permitted in advance of the specified phasing unless they are needed to overcome a District-level housing land supply shortfall or would deliver housing which is demonstrated to be in priority need in the locality at the time.

#### 9.22

Permission will not be granted for the development of sites in advance of this phasing unless the Council is having difficulty in demonstrating an adequate 5-year housing land supply, which is not expected to be the situation, or the site would meet a particular local priority for housing. Brownfield sites, which often have a long lead in time in terms of delivery have been specifically phased towards the earlier parts of the Plan period, as are sites meeting specialist needs such as older persons' or student housing.

#### 9.23

The NPPF expects that at least 10% of the housing requirement (about 1,570 dwellings) should be provided on sites no larger than 1 hectare. In Winchester District about 40% of the housing requirement will be provided on three strategic-scale sites over the Plan period. Nevertheless, it is expected that the Government's aspiration can be exceeded when account is taken of

Table H3 – Delivery of Small Housing Sites

Expected source of small sites	Dwellings*	
Completions 2019-2021 (sites under 10 dwellings)	245	
Planning consents at April 2021 (sites under 10 dwellings)	487	
Windfall allowance (all assumed to be sites under 1ha.)	1,975	
Local Plan allocations under 1ha. (policy W3 and CC4 only)	40	
Winchester District Total	2,747	

Figures include SDNP part of Winchester District and exclude 'communal' dwellings.

existing completions and commitments on smaller sites, windfall sites and Local Plan allocations, which total over 2,700 dwellings or 17% of the housing requirement.



9.23

## HOUSING PROVISION

## **Strategic Policy H3**

## **Spatial Housing Distribution**

In order to achieve the housing proposed for each spatial area (Policy H1) housing development will be permitted to achieve the following distribution (2019-2039):

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Spatial Area	Settlements / Area	Housing Provision	New Allocations Proposed
Winchester Town			
	Winchester	5,670	1460
South Hampshire Urban Areas		5,700	440
	West of Waterlooville, including Newlands		
	Whiteley		
Market Towns and Rural Area		4,250	785
	Market Towns:	1380	200
	Bishops Waltham New Alresford		
	Larger Rural Settle- ments:	1410	490
	Colden Common Denmead Kings Worthy Wickham		
	Intermediate Rural Settlements:	510	95
	Hursley Otterbourne South Wonston Sutton Scotney Swan- more Waltham Chase		
	Remaining Rural Area	950 (500* in SDNP area, 450** in remaining area)	0
		100 millionianing area,	

<sup>\*</sup> Agreed with SDNP Authority



 $<sup>^{**}</sup>$  Based on completions, commitments and windfall - no expectation of additional housing to be identified.

#### 9.24

The distribution of housing in Policy H3 is based on the sustainable development strategy (Policy SP2) and reflects the high level of existing commitments, especially within the three strategic sites: Berewood (West of Waterlooville, including Newlands), North Whiteley and Kings Barton (North Winchester). There is limited scope for intensification or expansion of the strategic sites in the South Hampshire Urban Areas so only modest additional growth beyond existing commitments is proposed.

#### 9.25

Winchester Town is the most sustainable settlement in the district, albeit also heavily constrained, so substantial new sites are allocated and some existing allocations have been carried forward with increased. Much of this can be accommodated on previously developed sites, including Sir John Moore Barracks, and land within the built-up area.

#### 9.26

The market towns and rural area contains a large number of settlements of varying sizes and types, as well as large areas of countryside. The various settlements have been assessed and a sustainable settlement hierarchy is set out in Policy H3. The more sustainable 'market towns' have a higher overall housing provision with new allocations for an additional approximately 100 dwellings each. At the next level, the larger rural settlements, require new

allocations of 85-200 dwellings each. The smaller 'intermediate' rural settlements have modest housing provision, as they do not benefit from significant commitments or completions. In the remaining rural area, planning policies allow for modest development within defined settlements, which is reflected in the windfall allowance for this area, and provision made through the South Downs National Park Local Plan.

#### 9.27

The area outside of defined settlement boundaries is defined as 'countryside' in policy terms and Policy SP3 applies to these areas. 'Settlement boundaries' are a key tool within the development plan and indicate where built development is, in principle, acceptable. Most settlement boundaries were reviewed in the current Local Plan and these have been further reviewed as necessary in considering site allocations. Settlement boundaries are not appropriate for some smaller or more dispersed villages and limited infilling development may be allowed in these settlements. Outside these provisions built development, especially for housing, is normally only permitted where there is a particular need for it which cannot be met within a built-up area. Policy H4 lists those settlements within the Plan area with settlement boundaries (as defined on the Policies Map) and those where infilling may be permitted.



9.27

## HOUSING PROVISION

## Policy H4

## **Development Within Settlements**

Development that accords with the Development Plan will be permitted within the defined boundaries of the following settlements, as shown on the Policies Map:

Bishop's Waltham, Colden Common, Compton Down, Denmead, Hursley, Kings Worthy, Knowle, Littleton, Micheldever, Micheldever Station, New Alresford, Old Alresford, Otterbourne, South Wonston, Southdown, Southwick, Sparsholt, Sutton Scotney, Swanmore, Waltham Chase, Whiteley, Wickham, Winchester Town.

Within the following settlements, which have no defined settlement boundary, development and redevelopment that consists of infilling of a small site within a continuously developed road frontage may be supported, where this would be of a form compatible with the character of the village and not involve the loss of important gaps between developed areas:

Bighton, Bishops Sutton, Compton Street, Crawley, Curbridge, Curdridge, Durley, Durley Street, East Stratton, Gundleton, Headbourne Worthy, Hundred Acres, Newtown, North Boarhunt, Northbrook, Northington and Swarraton, Otterbourne Hill. Shawford, Shedfield, Shirrell Heath, Soberton Heath, Stoke Charity, Wonston, Woodmancott.

Other development proposals may be supported to reinforce a settlement's role and function, to meet a community need or to realise local community aspirations. These should be community-led and identified through a Neighbourhood Plan or other process which demonstrates clear community support.

Elsewhere, countryside policies will apply and only development appropriate to a countryside location will be permitted, as specified in Policy SP3.

## MEETING HOUSING NEEDS

#### 9.28

The Council commissioned a Strategic Housing Market Assessment (SHMA) to consider the housing needs of the district as a whole, with focused information for the Local Plan area. The SHMA identified three sub-markets which demonstrate different characteristics – Winchester Town, the northern sub- area and the southern sub-area. This district-level study may be supplemented as time goes on with more localised assessment of need, for instance to inform Neighbourhood Plans.

Various components of housing need were considered in line with national planning policy and planning practice guidance. The SHMA considered the need for each of the following potential components of future housing needs in turn —

- Affordable Housing -
- Older persons housing Needs & those with difficulties
- Need for different sizes of homes
- Family Households
- Younger People
- Student Accommodation
- Service Families
- Build to Rent
- Self-build and Custom housebuilding
- Community led Housing

#### 9.29

The full evidence, and resulting conclusions and recommendations to the Council, are set out in the SHMA document. It has provided the basis for the following policy approach to meeting housing needs.

#### 9.30

The criteria set out in Policy H5 requires details of marketing undertaken to demonstrate that purchasers of self or custom build housing have been sought. The exercise should be able to demonstrate that the price and terms on which the land or premises were marketed were reasonable by comparison with similar examples of serviced plots in the local area. Information should be provided detailing any interest received from potential buyers since the marketing commenced. Where interest has been received and that interest has not been pursued, this must be documented.



9.28 -9.30

#### HOUSING PROVISION

## Strategic Policy H5

## Meeting housing needs

Development proposals will be supported where they provide housing of a type, size and tenure that contributes towards meeting housing

#### Dwelling size and tenure

All dwellings will be expected to meet the nationally described space standard.

Development proposals should deliver a range of types and sizes to meet housing need in accordance with the most recent evidence. Unless compelling evidence is provided to the contrary, proposals should include a reasonable mix of dwelling sizes. For development of 10 dwellings or more, this should include the following (part dwellings rounded up) -

- i. At least 30 % of affordable dwellings for rent should be 3 bedrooms or more:
- ii. At least 65% of affordable home ownership dwellings should 2 or 3 bedroomed houses, subject to Government requirements for the provision of 'First Homes'; and
- iii. At least 30% of market housing should be 1 or 2 bedrooms.

To ensure the requirement for smaller dwellings is being met, dwellings with multiple reception rooms which are capable of being used as bedrooms will, for the purposes of this policy, be considered to have additional bedrooms1.

## Self-build and custom-build housing

To improve choice and variety of new housing, proposals for self-build and custom-build homes that comply with other policies in this plan will be supported.

To support self-build and custom housing, on sites of 50 dwellings or more developers should provide at least 6% of serviced dwelling plots for sale to self-builders for a period of 12 months per plot. Any serviced plot which remains unsold after 12 months of marketing at or below market value can be made available on the open market or built out and sold by the developer.

Where a proposal's characteristics make it unsuitable for self/custom build provision, for example, specialist/older person accommodation, exemption from the policy will be considered on an individual basis.

#### Accessible and adaptable homes

All affordable dwellings, and 25% of market dwellings should be built to accessible and adaptable standards to meet the requirements of Building Regulations M4(2), subject to site suitability.

For schemes of 50 dwellings or more, 4% of all dwellings should be built as wheelchair user dwellings to meet the requirements of Building Regulations M4(3), subject to site suitability.



## Strategic Policy H5

Meeting housing needs - continued

## Specialist and Supported Housing

Proposals for well-designed specialist and supported housing (including older persons housing) will be supported where there is an identified need, the site is in accordance with other policies and is an appropriate location to allow integration into the local community, in close proximity to local facilities and services, and can be easily accessed by sustainable transport and an appropriate tenure mix is provided.

Schemes of 50 dwellings or more should be include an element designed and marketed to meet the needs of older persons, or other local specialist needs, and affordable units should be provided in the same proportion as the requirements for the site as a whole. The amount of specialist and supported housing should be in line with local needs. market intelligence and site viability. In applying this policy the Council will take account of the nature of the scheme and the practicalities of providing and managing affordable units.

#### **Build to Rent**

Proposals for Build to Rent housing will be supported where the site accords with other policies and is in an appropriate location and 20% of the Build to Rent units are provided (and maintained in perpetuity) at affordable private rents (at least a 20% discount to market rents inclusive of service charge).



Policy H5

<sup>1</sup> typically, dwellings with more reception rooms than bedrooms will be considered to have one additional bedroom for the purposes of this policy.

## DELIVERING AFFORDABLE HOUSING

#### 9.31

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. The context in which we are delivering affordable housing has changed since the preparation of the current Local Plan. Since 2018, national policy means that Local Plan policies need to define clear requirements for affordable housing provision as part of market housing schemes. The viability of affordable housing provision, and other policy requirements, has to be considered at the plan making stage rather than establishing a policy target and then assessing viability at the planning application stage which will determine the percentage of homes that a market housing scheme is able to provide.

#### 9.32

In addition to the costs of providing affordable housing, this upfront assessment of viability includes factors such as this plan's more ambitious policy requirements for carbon reduction, the differences in development costs between greenfield and brownfield sites, the need to achieve biodiversity net gain and the costs of addressing excess nitrates and phosphates in parts of the district. These different factors affect the viability of development because of their impact on developer costs.

#### 9.33

Experience has shown that it was not possible to achieve the full 40% affordable housing target in the current Local Plan in every case and the proportion of affordable homes was reduced where it could be shown that meeting the target would render the scheme economically unviable. The new Local plan policy sets clear requirements up-front, as opposed to a target, which reflects our current understanding of development costs. based on the location within the district and whether the site is on greenfield or previously developed land.

## 9.34

The most recent assessment of need is set out in the Strategic Housing Market Assessment produced by Iceni Projects Limited. It is important that all reasonable steps are taken to deliver affordable housing – through requiring affordable housing as part of market-led housing schemes, considering rural exception sites and supporting where appropriate proposals led by registered providers and community land trusts to meet specific community needs. The Council has adopted a housing strategy which seeks to accelerate and to maximise the supply of high quality affordable housing across the district.

#### 9.35

It is likely that the single largest source of supply for new affordable dwellings will be the proportion secured as part of larger market-led housing schemes. National policy indicates that where justified by need, affordable housing can be required providing it is supported by evidence on development viability. Therefore the evidence to date has considered both the need for various types of affordable housing and the potential impact upon development viability.

#### 9.36

In terms of need, the definition stated in national policy of affordable housing includes Affordable and Social Rent, shared ownership and low cost home ownership. National Planning Policy advises that at least 10% of all new housing on larger sites should be affordable home ownership. National Planning Guidance states that First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations. Full details about the identified needs for various types of affordable housing is set out in the Strategic Housing Market Assessment.

#### 9.37

It is important that affordable homes are provided that meet a wide range of community requirements and that a range of types and sizes are provided. The priority will be the provision of affordable housing in line with the most recent evidence of need.

#### 9.38

Affordable housing needs exist across the district, including the market towns and rural areas. New affordable housing will be actively encouraged in rural areas to meet local housing needs and help sustain rural communities and services. Community led initiatives will be supported where they are consistent with the policies contained in this Plan.

## 9.39

In order to ensure affordable homes are suitable and available for those in housing need, and are managed effectively, affordable housing should normally be designed to at least the Homes England's minimum standards, be provided by a Registered Provider/WCC that has local management arrangements acceptable to the Council, and that aligns to Council policies with respect to household eligibility, lettings and sales of the properties.

#### 9.40

In terms of viability, the Council has commissioned a Viability Study that analyses the economic capacity of new development to provide affordable housing, taking into account market conditions and the requirements for other planning contributions, including S106 contributions, the Community Infrastructure Levy, the factors which add to developer costs set out in 9.32, and development economics. That assessment has shown that, in general terms, larger development sites (i.e. those that exceed the threshold for contributing towards affordable housing) should be able to support delivery of 40% of the total number of units as affordable housing, in line with the types of tenure identified in the SHMA. This is however, subject to significant caveats as set out below.



9.31 -9.40

## DELIVERING AFFORDABLE HOUSING

#### 9.41

The council is mindful that the characteristics of individual sites and local market conditions can impact on site viability. By exception, where applicants can justify that a bespoke viability approach is required, then this will need to be supported by a statement evidencing why. Where specific viability challenges are identified, and evidenced by an applicant in relation to individual development proposals, this will be taken into account when considering that proposal and an open-book process should be adopted by applicants.

## 9.42

Delivering affordable housing depends upon other costs the development will be required to bear. Maximising the redevelopment of previously developed land is a key objective of the Plan, as these sites are often in the most sustainable locations and reduce the requirement for greenfield development. However, these sites are typically more costly to develop. The viability evidence indicates that the increased costs associated with previously developed sites reduce the viability of development to the extent that the affordable housing requirement can be reduced by 10%. This will ensure that the previously developed sites continue to come forward and make a contribution towards affordable housing.

#### 9.43

Policy NE16 sets out the requirements to mitigate the impact of additional nutrients resulting from development. Across the plan area there is a need to mitigate the impacts of additional nitrogen, for which the methods and costs of appropriate

mitigation is relatively well understood. In March 2022 Natural England advised that in relation to development which affects the River Itchen catchment area (which covers a significant part of the district), the impacts of additional phosphorus on the quality of the water environment also requires mitigation. The viability work done to date, based on the best understanding of the likely costs, indicates that in the affected areas the estimated costs of mitigation will reduce development viability level so that affordable housing should be reduced by 5%. The evidence of the potential methods to address this issue and costs associated with phosphorus mitigation are still evolving.

#### 9.44

The Government has recently announced measures which are intended to support the delivery of strategic mitigation solutions, and reduce the impact of new development on the quality of the water environment in the first place by 2030, but the impact of these in relation to development viability are not yet known so cannot be quantified at the present time. Given this uncertainty it is considered appropriate that agreements to secure affordable housing include measures to secure further contributions to affordable housing should those costs reduce significantly. Any significant changes relating to the affordability of mitigation will be reported in the Authority Monitoring Report. Further iterations of this Plan will reflect additional experience and understanding of development viability, including mitigating the impacts of phosphorus and reductions in sustainable construction costs, and therefore how this impacts on the costs of development in the affected area.



## Policy H6

## Affordable housing

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

- 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% as First Homes; 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 maximum Local Housing Allowance level); and

vii.The remainder as other affordable home 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.

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.



9.41 -9.44

## DELIVERING AFFORDABLE HOUSING

#### 9.45

In order to maximise affordable housing provision, and to meet particular local needs as quickly as possible, the Council will be prepared to consider further affordable housing development on land where planning permission would not normally be granted, on what is referred to as 'exception sites'. The local needs to which this policy approach relates will be those arising from the Parish or settlement to which a proposal relates.

#### 9.46

It is expected that in most cases this will mean that sites are developed exclusively for affordable housing that meets priority needs, and mainly comprise housing for rent. Where for the reasons set out in Policy H7 the need to generate additional value through cross subsidy is accepted the Council may, exceptionally, be prepared to allow additional forms of tenure.

#### 9.47

However, the aim of this policy is to deliver significant additional affordable housing and it is only by achieving this policy objective that exceptions to normal policy can be justified. If the proportion of affordable housing falls below a certain point then the balance between the benefits of achieving affordable housing outweigh the detrimental impact on the countryside. Therefore, no less than 70% of the homes proposed should meet priority local affordable housing needs.

#### 9.48

The remaining element of housing should still take the form of affordable housing to meet local needs, albeit those of a lesser priority. However, with justification, this could exceptionally include open market housing. Applicants should examine alternatives in a sequential way giving priority to providing affordable housing that meets the greatest local housing need. Where it is claimed there are financial reasons for requiring alternative forms of housing this will need to be assessed as part of an open-book process. The same approach will be taken to all sites brought forward under this policy, including windfall and allocated sites.

#### 9.49

It is envisaged that most sites coming forward will relate to smaller settlements, where such development can not only meet specific housing needs, but can also help sustain rural communities and their services. However, the policy also allows appropriate development in relation to larger settlements where the provision of affordable housing is the prime objective (although in such cases development should still be small in scale). In determining whether a site may be suitable as an 'exception site' regard will be had to the suitability and availability of other sites that have the potential to meet local housing needs.



#### 9.50

It is important that the need for affordable housing in an existing settlement (or group of settlements) is well evidenced. This will normally be by reference to the Councils' Housing Register, in so far as it relates to the settlement or group of settlements. In some cases a local needs survey or data collection may be required. Land may be allocated by the local planning authority in order to meet the objectives of this policy or communities themselves may allocate suitable land through a Neighbourhood Planning process or as part of Community Right to Build proposals or similar community led initiatives.

#### 9.51

In response to community representation and because of the exceptional nature of these sites, priority for the occupation of affordable homes provided under this policy will be given to local households. This means those households in housing need that have a local connection to the settlement or group of settlements to which the development relates.

## 9.52

Evidence of suitable community involvement, including the Parish Council(s), and support for a scheme will be required if proposals are to be favourably considered. The Council is able to offer support in researching local housing needs, generating and assessing options, community involvement and scheme delivery.



9.52

## DELIVERING AFFORDABLE HOUSING

## Policy H7

## Affordable Housing Exception Sites to Meet Local Needs

In order to maximise affordable housing provision to meet identified affordable housing needs the Local Planning Authority will exceptionally grant permission or allocate sites for the provision of affordable housing to meet the specific local needs of particular settlements, on land where housing development would not normally be permitted.

Development will only be permitted where:

- i. The applicant can demonstrate that the proposal is community-driven and has community support;
- ii. The proposal is suitable in terms of its location, size and tenure to meet an identified local housing need that cannot be met within the policies applying to the settlement to which that need relates;
- iii. The scheme is of a design and character appropriate to its location and avoids harm to the character of the area or to other planning objectives, taking account of the policy objective to maximise affordable housing provision;
- iv. The affordable housing is secured to meet long-term affordable housing needs, and will remain available in perpetuity (subject to any legislative requirements);

Subject to the needs of the local community the affordable homes should be for rent (with rent levels being determined by reference to local incomes of those in priority housing need). In exceptional circumstances a modest element of other tenures may be allowed on the most suitable identified sites in order to enable a development to proceed. providing no less than 70% of the homes proposed meet priority local affordable housing needs.

In these circumstances the applicant should demonstrate that alternative forms of housing are required due to the economics of provision. The quantity, tenure and type of that housing should be limited to that which allows the affordable housing development to proceed.



#### 9.53

Permitted development rights generally allow for a reasonable extension to be made to a property, often at ground and roof level. It is therefore reasonable that any further extensions should be subject to consideration by the local planning authority. In Winchester District, the availability of smaller-scale dwellings in countryside locations is an area of concern. Policy H8 is aimed at retaining the existing stock of smaller dwellings where possible, whilst allowing for some degree of enlargement of the dwellings.

#### 9.54

The SHMA refers to the presence of a high proportion of larger detached houses within the rural area, when compared to the district as a whole. There is a particular bias towards houses with 4 or more bedrooms and a correspondingly lower percentage of smaller (1-3 bedroom) properties. Particularly in the countryside, where new housing is generally inappropriate, the loss of smaller dwellings is difficult to rectify. There is a need to retain the limited existing stock of smaller dwellings that do exist in the countryside and it is therefore important to apply policies to achieve this.

## 9.55

New housing only adds about 1% to the housing stock each year, so the vast majority of housing in the district consists of existing dwellings. The opportunities for achieving a greater housing mix are more limited in the countryside as larger developments, which provide the best opportunities for achieving a mix of dwellings as sought under Policy H5, are unlikely to be permitted. Small dwellings that are extended disproportionately, or replaced by larger dwellings, are unlikely to be replaced readily, or within the vicinity. It is therefore considered important that small dwellings be retained wherever possible, in order to maximise the variety in the housing stock.

#### 9.56

The retention of smaller dwellings also has an effect on the provision of more affordable housing in the district. Average house prices in the Winchester District are significantly above the average for the country and for the South East as a whole. Smaller dwellings will, by their very nature, attract a lesser value than would a similarly located larger property. Therefore the retention of smaller dwellings is seen as an important component of maintaining a supply of relatively affordable dwellings. In this context 'affordable' is defined as being relative to the market price that may be achieved on an unfettered development, rather than as referred to in Policies H5 and H6.

#### 9.57

It is recognised that the smaller dwellings subject to this policy may not be affordable for all persons in housing need and may still have an above average market price. However, this is to be viewed in the context of the average house prices in the local area and the fact that a smaller dwelling may be, to some extent, relatively affordable.



# POLICY

## DELIVERING AFFORDABLE HOUSING

#### 9.58

This policy applies to dwellings that were up to 120 sq.m. gross floorspace, from April 2017 (when this policy was first adopted as part of the development plan for the district) or when originally constructed, whichever is the later. The 25% increase is an absolute increase in gross floorspace, applied to the size of the dwelling as originally constructed or on adoption of this Plan (whichever is later), irrespective of any subsequent additions or permitted development rights that may pertain to the property. In some instances, this may mean that no further extensions above permitted development allowances will be permitted under this policy. In order to achieve the aim of retaining smaller dwellings in the countryside, the Council will not generally permit further extensions once the 25% limit has been reached. Some permitted development rights may need to be removed to achieve this aim and a planning condition to achieve this may be needed in some cases.

#### 9.59

When calculating the size of dwellings, buildings should be measured externally. Outbuildings and detached garages will not be included in the calculation, although integral garages and other buildings originally attached to the dwelling and forming part of the usable living space will. Any roof spaces that form habitable rooms will comprise part of this calculation. If the original size of the dwelling cannot be confirmed, the planning authority will make a judgement based on the best evidence available at the time of an application.

## **Policy H8**

## Small Dwellings in the Countryside

The extension and replacement of existing smaller dwellings in the countryside will be limited so as to retain the stock of such dwellings within the district.

Dwellings with gross external floorspace of up to 120 sq.m. as at April 2017, or as originally constructed –

whichever is the later – will be permitted to extend by up to 25% of their original size This also applies to any replacement of such dwellings.

The Planning Authority will consider restricting permitted development rights in order to prevent further extensions which would exceed this provision.

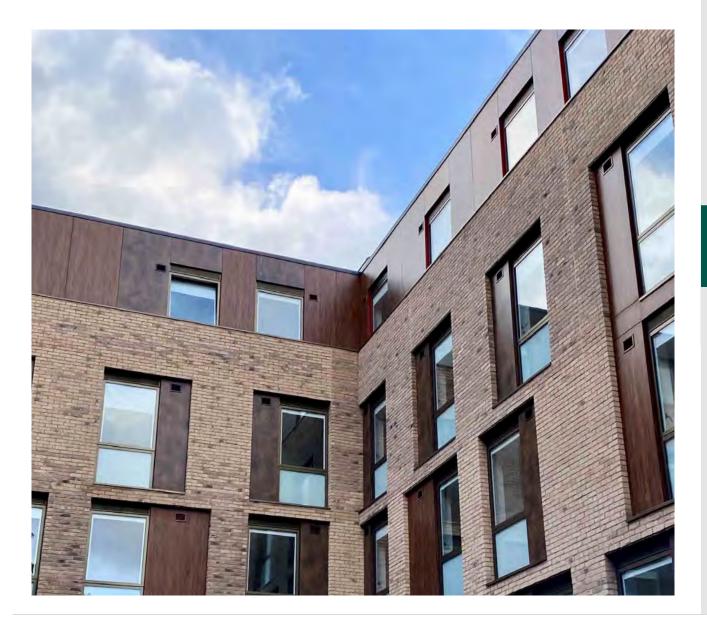


# STUDENT ACCOMMODATION AND HOUSES IN MULTIPLE OCCUPANCY (HMOS)

# What are we aiming to achieve



- To provide adequate homes to meet the need for student accommodation over the Local Plan period
- To avoid the loss of important housing types, such as family and affordable housing, to student accommodation
- To protect the character of areas where student accommodation is proposed.





9.58 9.59

## STUDENT ACCOMMODATION AND HOUSES IN MULTIPLE OCCUPANCY (HMOS)

#### Student Accommodation

#### 9.60

There are two main higher education establishments in Winchester, the University of Winchester and the University of Southampton (Winchester School of Art), with Sparsholt College also located in the district. The City Council recognises the important contribution that higher education establishments and their students make to Winchester by supporting the local economy and labour market, culture, research, and contributing to mixed communities. Both the University of Winchester and Southampton University have plans to expand their academic activities within Winchester. The City Council supports these aims and policies W10 and W11 identify broad locations suitable for the expansion of the Universities in Winchester, at Romsey Road and River Park.

#### 9.61

As well as expanding and improving academic facilities, it is important that corresponding provision is made for the accommodation needs of students. Dedicated student housing provision helps to avoid the need for students to commute into and out of Winchester, reduces pressure on the stock of family and specialist housing and potentially allows existing houses in multiple occupation (HMOs) to revert to family homes or other types of accommodation. The SIP consultation asked about the provision of housing for students and the responses show support for greater provision of purpose-built student accommodation, but also seek greater control over student housing (HMOs) in existing residential neighbourhoods.

#### 9.62

Accordingly, policy H9 promotes the development of purpose-built student accommodation in suitable locations, where there is easy access to the establishments being served by active travel modes or public transport and where this would not be harmful to established residential neighbourhoods. Whilst it is envisaged that there will be limited parking for occupiers, there will be a need for parking to service the accommodation and facilitate changeover. Student accommodation will be resisted in locations which do not meet the criteria of policy H9 and policy H10 provides controls over houses in multiple occupation (HMOs) where necessary.



## Policy H9

## Purpose Built Student Accommodation

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

- i. The type of student accommodation proposed would meet a need in the locality resulting from a shortfall of existing provision or planned expansion by an academic institution, or would secure the release of family housing from HMO use:
- ii. The location of the accommodation is easily accessible to the establishment it is planned to serve by walking, cycling or existing / proposed public transport;
- iii. Adequate cycle and car parking provision is made within the development, designed to encourage active travel, discourage private car use, and avoid unacceptable increases in on-street parking in the surrounding area;

- iv. Proposals are compatible with, and consider the impact upon the surrounding area in terms of their design, scale, layout, and impact on residential amenity through noise and disturbance:
- v. The proposal is not on a site allocated for other uses, or where there are policies in place to protect the existing uses such as open space, employment or facilities and services:
- vi. Adequate provision is made for recycling and refuse storage / disposal.
- vii.A management plan or other controls will be put in place prior to occupation of any accommodation, to ensure the scheme is occupied and operated as permitted and managed effectively so as to ensure a safe and pleasant living environment for students and the local community.



9.60 9.62

## STUDENT ACCOMMODATION

#### 9.63

The University of Winchester has almost 7,000 full time students (2019/20 data) and is developing a 'Masterplan Vision' to set out a proposed development framework for the University's campus, including a long-term aim of reaching 10,000 students. Policy W11 identifies a 'broad location' for change and growth which includes land at and adjoining the University campus for such development. The Policy also covers the existing Royal Hampshire County Hospital site, where change is also anticipated. It is expected that development, redevelopment and conversions in this location will include provision for a substantial increase of student bedspaces and general housing, resulting in an overall increase of about 200 dwelling equivalents.

#### 9.64

Southampton University also plans to expand Winchester School of Art on the former River Park Leisure Centre site. primarily for additional academic space. The University's campus and land at the former River Park Leisure Centre is also identified as a location for change and growth (see Policy W10). This will also need a masterplan to show how it can be developed in accordance with the requirements of Policy H9 and achieve an increase in student housing accommodation to support it and prevent students from commuting into the town. It is estimated that an additional approximately 350-400 student bedspaces (about 100 dwelling equivalents) will be provided nearby but not on the site covered by policy W10.

#### 9.65

Provision by the Universities is generally aimed at 1st year students, with the accommodation needs of other students often met by various specialist private providers of purpose built schemes, sometimes in conjunction with the Universities and sometimes speculatively. As of April 2021 there were 240 student beds under construction or with planning consent and a further application for almost 160 beds under consideration. There is therefore scope for substantial new student accommodation, either committed, planned directly by the Universities, or likely to be provided privately. This will not only help to support the expansion plans of the Universities, but could help to reduce the number of houses in multiple occupation (HMOs), which are substantial in parts of Winchester like Stanmore.

#### 9.66

Policy H9 facilitates such development while seeking to ensure it meets local needs and is appropriately located, designed and managed. Where sites are not on or adjoining an education campus they should be very well related to it, ideally to allow residents to walk to their destination (normally within 400 metres). Otherwise there should be good cycle links or direct and frequent public transport connections or other sustainable travel arrangements put in place, with car parking limited so as to minimise traffic generation. Purpose built student accommodation usually involves substantial buildings which require careful location and design. It is inevitable that these will often appear



different to surrounding development and this is acknowledged, but it is still necessary for it to maintain amenity and privacy for nearby residents and avoid harm to the townscape of the area in which it would be located. This applies not just to the original design, but also to the operation of the accommodation, which needs appropriate management.

#### 9.67

Many students find accommodation in 'houses in multiple occupation' (HMOs), which are typically former family houses that have been converted to provide student bedrooms. This has been a particular issue in Stanmore where over 20% of properties were estimated to be HMOs when the Council introduced a policy to control these (Policy WIN9, Local Plan Part 2, 2017). This policy works in conjunction with 'Article 4 Directions' which can be made in areas where the uncontrolled growth of HMOs is causing concern. A direction restricts permitted development rights relating to the formation of new HMOs and in so doing brings them within the scope of planning control. Applications for additional units can then be assessed against policy to ensure an appropriate balance of housing stock is maintained in neighbourhoods affected by increasing numbers of HMOs. Article 4 Directions have been made, but not vet confirmed and introduced in Stanmore (2016) and Winnall (2018), with a further Direction for the Chalk Ridge (Winnall) planned. The policy covers the whole of Winchester and enables controls to be applied elsewhere if needed.



9.63 9.67

## HOUSES IN MULTIPLE OCCUPATION (HMOS)

#### 9.68

The approach of using Article 4 Directions and Local Plan policy thresholds has been effective and is carried forward by Policy H10, with the addition of a criterion referring to protecting the amenities of residents and the surrounding area. Further Directions may be applied as necessary in areas with an existing or potential over-concentration of HMOs, such that local communities have well-founded concerns over amenity and the availability of family housing. Directions remove permitted development rights for changes of use from a dwelling-house (Use Class C3) to use as a HMO by not more than six residents (Use Class C4) within the area covered by the Direction. As indicated above this brings such changes within planning control (use by over 6 usually residents requires consent anyway), allowing applications to be judged against the criteria in Policy H10.

#### 9.69

The policy aims to prevent the overconcentration of HMOs in any one street and area but exceptionally a single existing dwelling may be in an area dominated by HMOs and rendered unsuitable for continued use as a dwelling allowing permission to be given for a change of use of that property to an HMO. If so, evidence should be provided to show why continued use as a dwelling is not realistic and that reasonable attempts have been made to use the property or to market it at a reasonable price, based on the local property market and provisions of Policy H10. Parking provision for HMOs should accord with local standards, taking into consideration the amount of parking available on and off site, existing parking pressures and the proposed number of bedrooms and expected occupancy.



## Policy H<sub>10</sub>

Houses in Multiple Occupation (HMOs)

In order to retain a balanced housing stock, the Council will designate Article 4 Directions in order to restrict permitted development rights in relation to the creation of houses in multiple occupation (HMOs). In areas subject to such a Direction, proposals for the conversion of dwellings to houses in multiple occupation will be permitted where the proposal accords with the Development Plan, provided

- i. Would not create an over concentration of HMOs, with no more than 20% of all properties in the total designated area being HMOs, or no more than 25% of the properties on any one street in use as HMOs;
- ii. Would not result in a dwelling being bounded by HMOs on both sides, or a continuous line of 3 or more HMOs. Exceptionally, the change of use of an existing dwelling to an HMO may also be permitted where its suitability for continued use is seriously compromised because of existing domination by HMOs;
- iii. Would not be detrimental to the amenities of nearby residents or the overall character and amenity of the surrounding area;
- iv. Provides adequate cycle and vehicle parking to meet the needs of the development taking into consideration the availability and adequacy of on-street parking.

'Dwellings' are defined as housing within Use Class C3 and Houses in Multiple Occupation are within Use Class C4 (up to 6 residents) or Sui Generis (over 6 residents).



9.68 9.69

## HOUSES IN MULTIPLE OCCUPATION

#### 9.70

Due to the need to resist general housing development in the countryside, proposals for dwellings will only be permitted where there is a clear and proven need for accommodation for agricultural, forestry or other essential rural workers. In order for the principle of development to be accepted, there has to be a functional need for the operation of the unit that a full-time worker be present i.e. that it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times. Where a functional need is demonstrated it will be necessary to assess whether this could be fulfilled by existing dwellings on the unit, or other existing accommodation in the area, which is suitable and available for occupation by the workers concerned. Account will be taken of existing dwellings that may have been disposed of or otherwise separated from the holding.

#### 9.71

As permanent dwellings will only be permitted to fulfil the needs of an established and viable agricultural or forestry enterprise, it will be necessary to demonstrate that the business is an ongoing concern. To establish this, evidence of the financial viability of the enterprise will be required. New accommodation will therefore normally be granted initially on a temporary basis (generally three years), at the end of which period the need for a continuing residence should be assessed. If, as a result of this assessment, a permanent residence is justified, an application for a new dwelling can be considered.

#### 9.72

As dwellings will initially be granted on a temporary basis, they will therefore generally take the form of temporary accommodation such as mobile homes or caravans. These buildings will be required to be removed at the expiration of the temporary permission.

#### 9.73

Given the potential intrusion of a new building in the countryside, the design and siting of the dwelling should be as sensitive as possible. Siting close to existing farm buildings will generally be preferable in terms of limiting visual impact, where this is possible. The conversion, or part conversion, of existing buildings will generally be preferable to new constructions. Dwellings that are unusually large in relation to the agricultural needs of the unit, or unusually expensive to construct in relation to the income the unit can sustain, will not be permitted.

#### 9.74

Each case will be considered on its merits in relation to the size and nature of the holding, the management responsibilities of the worker, the income derived, and the likely future productivity and viability. Normally dwellings will be expected to be within the range 120m2 - 150m2 floor area (externally measured), the typical size of a 3 - 4 bedroom house. Dwellings for farm employees should normally be close to 120m2, whereas dwellings for farmers with management responsibilities, requiring office space, should not exceed 150m2. Restrictions may be placed on permitted development rights in order to keep the scale of the dwelling proportionate to the functional need and level of viability.



#### 9.75

Any new dwellings permitted under this policy will be to meet the functional need of the business, rather than the personal circumstances of any occupants of the dwelling. Where housing is permitted in accordance with this policy, the future occupancy of the dwelling(s) will be limited by condition to persons solely or mainly employed, or last employed, in the locality in agriculture or forestry, or a widow or widower of such persons.

#### 9.76

Where dwellings exist on the holdings that are unrestricted, but essential to the operation of the holding, occupancy conditions may be placed on these dwellings. Planning obligations may also be sought to restrict the future subdivision of holdings or the separation of dwellings from land or buildings.

## 9.77

Applications for the removal of occupancy conditions will be considered with regard to the present and expected future need for such dwellings in the location, rather than the needs of the existing or prospective occupiers.

#### 9.78

Applicants will need to demonstrate why the dwelling is no longer required for its original purpose. Where occupancy conditions are removed, permission will not be granted for any new agricultural or forestry workers dwellings on the holding or on any new holdings created by its subdivision.

#### 9.79

Uses other than those of agriculture or forestry will not normally justify on-site accommodation as they will not normally have an essential need to locate onsite. Operators of other enterprises in rural locations, such as equestrian businesses, should have regard to the adequacy of accommodation when setting up or developing the business. Where applications for new dwellings are made, applicants will need to demonstrate why the accommodation is necessary and show that suitable accommodation cannot be secured within a reasonable distance of the site, in accordance with Policy H11.



9.70 -9.79

## HOUSES IN MULTIPLE OCCUPATION

## **Policy H11**

## Housing for Essential Rural Workers

New permanent dwellings will generally only be permitted in the countryside to support existing agricultural/forestry activities on wellestablished agricultural or forestry enterprises. Proposals should demonstrate that:

- i. There is a clearly established existing functional need;
- ii. The need relates to a full-time worker, or one who is primarily employed in the agriculture/ forestry enterprise, and does not relate to a part-time requirement;
- iii. The unit and the agricultural/ forestry activity concerned have been established for at least three years, have been profitable for at least one of them, are currently financially sound, and have a clear prospect of remaining so;
- iv. The functional need could not be fulfilled by another existing dwelling on the unit, or any other existing accommodation in the area which is suitable and available for occupation by the workers concerned;

- v. The dwelling is sited so as to meet the identified functional need and is well-related to existing farm buildings or other dwellings;
- vi. The dwelling is of a size appropriate to the productivity of the holding (normally 120 sq.m. -150 sq.m. including office space).

The design of the dwelling should reflect local distinctiveness and the rural character of its surroundings.

All dwellings permitted under this policy will be subject to occupancy conditions restricting the occupancy of the dwelling to a person solely or mainly employed, or last employed, in agriculture or forestry and any resident dependants.

Before permitting new permanent agricultural dwellings, a temporary building should first be established for at least three years to fulfil criterion (iii).

Before permitting a temporary dwelling the local planning authority will need to be satisfied that there is:



# Housing for Essential Rural Workers - continued

- i. Clear evidence of a firm intention and ability to develop the enterprise concerned;
- ii. Clear evidence that the proposed enterprise has been planned on a sound financial basis;
- iii. A functional need for the accommodation, which cannot be satisfied by existing nearby accommodation.

Temporary agricultural dwellings will be subject to occupancy conditions and will only generally be permitted for a period of up to three years, after which time the needs of the holding will be reviewed.

Temporary permissions will not normally be renewed and it is expected that a permanent dwelling will be constructed in its place, or in the immediate location, should the need for long-term accommodation be demonstrated and the proposal fulfils criteria (i) - (vi) above for a permanent dwelling.

Occupancy conditions on essential rural workers dwellings will only be removed where the local planning authority is satisfied that the long-term need for the dwelling has ceased and there is no evidence of a continuing need for housing for workers solely or mainly employed in agriculture or forestry on the holding or in the surrounding area.

New housing in the countryside other than for agricultural or forestry workers (or replacement dwellings) will generally not be permitted. Where other rural workers claim to have essential accommodation needs. (e.g. in equestrian enterprises) these should normally be met within the existing housing stock. When applications for such dwellings are made they will be subject to the tests and requirements of this policy, where references to agriculture and forestry should be taken to apply to the particular enterprise concerned as appropriate.



Policy

# What are we aiming to achieve



- i. To provide adequate accommodation to meet the need for the district's gypsies, travellers and travelling showpeople over the Local Plan period
- ii. To maintain an adequate supply of traveller pitches and plots over the Plan period, to maintain at least 5 years' supply of deliverable land
- iii. To protect the character of areas where traveller accommodation is proposed and avoid the overconcentration of traveller sites or other harmful effects to the 'settled' community

# Traveller Accommodation

# 9.80

Local Authorities are required by Government to assess the accommodation requirements of gypsies and travellers and to develop a strategy that addresses any unmet need identified. Opinion Research Services (ORS) were appointed to undertake a comprehensive accommodation needs assessment of gypsies and travellers in Winchester District. The resulting Winchester GTAA covers the whole area of the district, where the council is the housing authority, which differs from the Local Plan area that excludes the part of the district covered by the South Downs National Park. Traveller needs within the National Park Authority's area will be addressed in that Authority's future Local Plan, with the Winchester Local Plan dealing with needs outside the SDNP part of the district.

# 9.81

The Winchester Gypsy and Traveller Accommodation Assessment (GTAA) included stakeholder engagement and surveys of travelling communities, specifically interviewing as many of the identified travelling community within the district as possible. The GTAA assesses the need for pitches and plots based on current and future needs, taking account of the results of the interviews and expected household formation. The needs are broken down into those arising from gypsies and travellers and from travelling showpeople, and those relating to travellers that meet the Government's definition of 'travelling' (Planning Policy for Travellers Sites – PPTS 2015). The travellers identified by the GTAA in the district tend to be those with longterm cultural links to travelling, such as Romany gypsies and travelling showpeople. The majority of sites are small family sites and much of the future need is for this type of provision. The GTAA did not identify any needs arising from other types of traveller such as New Age travellers.



# 9.82

The GTAA breaks also down the overall gypsy and traveller and travelling showpersons need into 4 year bands (starting at the base date of July 2022). The current need takes into account unauthorised pitches, pitches with temporary planning permission, concealed and doubled-up households and movement from bricks and mortar in the first 4 years. The total net new household formation is then applied proportionately across the remaining 4 year bands.

# 9.83

This results in the following pitch and plot needs for the Local Plan period to 2039, broken into gypsy and travellers pitches and travelling showpersons' plots (excluding South Downs National Park needs). The requirements in Table H3 relate to the needs of travellers that meet the Planning Policy for Travellers Sites definition of 'travelling', but there are also a considerable number of travellers that do not currently meet the definition (nonnomadic' travellers) or whose status is unknown.

Table H3 – Traveller Pitch / Plot Needs by 4-Year Period

Pitches / by 5-Year	Plots Nee Period	ded		Total
2022- 2026	2027- 2031	2032- 2036	2037- 2039*	2019- 2039
Gypsy and Traveller Pitches				
79	14	15	7	115
Travelling Showpersons' Plots				
21	2	3	1	27

<sup>\*</sup> Extrapolated to 2039 as GTAA covers the period to 2038



9.80 9.83

# Policy H12

# Provision for Gypsies, Travellers and Travelling Showpeople

Planning permission will be granted for pitches to meet gypsy and traveller accommodation needs for the area covered by this Plan, as identified by the most recently-published Gypsy and Traveller Accommodation Assessment (GTAA). Policies are included within this Plan to facilitate adequate provision and consent will granted for pitches and plots which accord with these policies, subject to the following criteria:

- i. Sites should be well related to existing communities to encourage social inclusion and sustainable patterns of living, while being located so as to minimise tension with the settled community and avoiding sites being overconcentrated in any one location or disproportionate in size to nearby communities. Harmful impacts on nearby residential properties by noise and light, vehicle movements and other activities should be avoided;
- ii. Sites should be accessible to local services such as schools, health and community services by public transport, on foot or by cycle, but avoid placing an unreasonable burden on local facilities and services;

- iii. Sites should be clearly defined by physical features, where possible, and not unduly intrusive. Additional landscaping should be provided as necessary to screen views into/out of the site and provide privacy for occupiers. This and any security measures should respect the character of the site and local landscape.
- iv. Sites and the layout proposed should avoid harm to the significance or setting of heritage assets or biodiversity interests;
- v. Sites should be capable of accommodating the proposed uses to acceptable standards and provide facilities appropriate to the type and size of the site, including:
  - Water supply, foul water drainage and recycling/waste management. Details should be provided of wastewater infrastructure, including a foul drainage assessment and surface water drainage, incorporating SUDS where possible. Waste should be stored appropriately for disposal and able to be collected in an efficient manner.
  - Open space within the site for safe children's play, located to avoid conflict with vehicles on the site;
  - Safe vehicular access from the public highway and adequate provision for parking, turning and safe manoeuvring of vehicles within the site (taking account of



# Provision for Gypsies, Travellers and Travelling Showpeople - continued

site size and impact). No vehicle over 3.5 tonnes should be stationed, parked or stored on site, unless necessary for the use of a travelling showpersons site;

- In rural locations, any permanent built structures should be restricted to essential facilities such as a small amenity block;
- No commercial activities should take place on the land, including the storage and sorting of materials, other than as necessary for a site's use as a travelling showpersons site;
- Minimise external lighting to avoid a detrimental impact on the surrounding locality;
- Plots for travelling showpersons should have adequate space for the storage and maintenance of equipment and be laid out to avoid conflict between vehicles and residents.
- vi. Proposals should be consistent with other policies such as on design, flood risk, contamination, protection of the natural and built environment or agricultural land quality and protect areas designated for their local, national or international importance, such as Gaps and the South Downs National Park.

Proposals for transit sites and sites for non-nomadic travellers will be considered on an individual basis, taking account of evidence of need and the criteria above, as relevant.



Policy H12

# 9.84

The majority of the need for additional gypsy and traveller pitches arises in the first 4-year period, due particularly to shortterm needs arising from unauthorised developments or concealed and doubled-up households. In particular, unauthorised development at Carousel Park (Micheldever) and the Firgrove Lane area (North Boarhunt) accounts for much of the short-term pitch need. Many of the unauthorised pitches on these sites appear to be occupied by people that are not travellers, or who do not meet the Government definition of 'travelling' and whose needs are, therefore, covered by the general housing policies of this Plan. The Council is in the process of taking enforcement action to regularise the situation on these sites, and other unauthorised developments.

# 9.85

The medium and long-term needs for gypsy and traveller pitches tend to arise primarily from the future needs of teenage children on existing sites, who will be establishing their own households over the Plan period, and from other new household provision. The GTAA includes an assessment of the scope to meet these needs by delivering additional pitches through the intensification or expansion of existing traveller sites. This concludes that there may be scope to meet the need for about 20 additional pitches in this way and policies H14 and H15 provide for site intensification or expansion respectively. In addition, the Council is seeking to bring the former public site at Tynefield (Whiteley) back into use and to expand the number of pitches provided to about 30 (policy H18).

# 9.86

The various 'calls for sites' that have been undertaken through the SHELAA (Strategic Housing and Employment Land Availability Assessment) have not resulted in any suitable new traveller sites being promoted. Therefore, this Plan is not able to make any additional traveller site allocations, but does reaffirm allocations for a number of existing sites. It also seeks to safeguard all existing authorised traveller sites, and any that may be permitted in the future, so as to maintain the existing stock of pitches (policy H13).

# 9.87

The need for plots for travelling showpeople is much more modest and there are no existing unauthorised sites. Most future needs are from teenage children on existing sites and other new household provision. The pitch deliverability assessment that is included in the GTAA concludes that there is very limited scope to meet showpersons' needs in this way, amounting to about 5 additional plots. Policies H14 and H15 provide for site intensification or expansion respectively and policies H13, H16 and H17 seek to safeguard existing sites and achieve/ maintain full travelling showpersons' use of sites at The Nurseries, Shedfield and Carousel Park, Micheldever.



# 9.88

The results of the engagement together with the evidence studies have informed the proposed strategy to meet traveller needs, which involves:

- Safeguarding existing permitted and lawful sites (policy H13);
- Assessing the scope to intensify or expand existing family sites (policies H14, H15);
- Specific site allocation policies for larger or more complex sites (policies H16, H17, H18); and
- Providing for the intensification or limited expansion of existing lawful sites, where appropriate (policies H14, H15).

The identified needs are expected to be provided through the following sources of supply, with the details set out in the policies below.

Table H4 – Delivery of Traveller Pitches / Plots

Expected source of sites	Gypsy & Traveller Pitches	Travelling Show- persons Plots
Sites identified in GTAA Pitch Deliver- ability Assessment (policies H14 and H15)	20	0
Supply from site allocations (policies H16, H17, H18)	30	10
Supply from windfall and site intensification / expansion (policies H14 and H15)	65	17
Total	115	27

# 9.89

Policy H12 sets out the criteria that will be applied to applications for gypsy and traveller pitches or plots. Such applications may be permitted in accordance with policies H13 – H18 and the criteria of policy H12 will be applied in addition to any specific requirements of those policies. Policy H12 applies to all travellers but prioritises those meeting the definition of 'travelling' (Planning Policy for Traveller Sites 2015).

# 9.90

There are many existing sites which have permanent planning permission for traveller use. Some of these were granted permission several years ago, with conditions limiting occupation to those falling within the traveller definition applicable at the time and sometimes specific to named occupants. The GTAA highlights that some occupants are no longer travelling or their travelling status is unknown. However, the Council acknowledges that the sites in Policy H13 are well established and have a confirmed planning status for gypsy and traveller or travelling showpersons use.

# 9.91

Policy H13 therefore proposes that existing sites which have planning permission or lawful use for gypsy or traveller or travelling showperson use, and others that may be authorised in the future, are safeguarded. This will ensure that the permitted use as a traveller site is not lost through the grant of any subsequent planning permission, or relaxation of planning conditions, to allow for other types of development. The policy applies to the sites named below and identified on the policies map and includes the number of pitches specified in the planning permission. However, one pitch/plot may be able to accommodate more than one mobile home and touring caravan as specified in the permission. Where planning conditions are based on earlier definitions of travellers, these sites have potential to meet 'unknown' or 'nonnomadic traveller' needs.



9.84 -9.91

# **Policy H13**

# Safeguarding Traveller Sites

The existing gypsy and traveller and travelling showpersons sites listed below (which have permanent planning consent), and as shown on the Policies Map, will be safeguarded from alternative development, unless the site is no

longer required to meet any identified traveller needs. Other sites that are subsequently granted permanent planning permission for gypsy and traveller and travelling showpersons use will also be safeguarded in accordance with this policy.

Travelling Showpersons Sites		
Site	Location	No. of Authorised plots
W020	Carousel Park, Micheldever	9
W021	The Haven, Den- mead	1
W022	The Orchard (Or- chard Drive), Forest Road, Swanmore	4
W023	Plot 1, The Nurseries, Shedfield	2
W024	Plot 2, The Nurseries, Shedfield	1
	Plot 4, The Nurseries, Shedfield	1
W026	Grig Ranch, Wick- ham	1
W028	Stokes Yard, Waltham Chase	1
W029	The Vardo, Swan- more	1
	The Bungalow, North Boarhunt	2

Gypsy and Traveller Sites		
Site	Location	No. of Authorised pitches
W002	Ash Farm, Titch- field Lane, Wick- ham	2
W003	Westfork, Bunns Lane, Hambledon	1
W004	Joymont Farm, Curdridge Lane	1
W005	Ashbrook Stables, Main Road, Colden Common	1
W006	Barn Farm, The Lakes, Swanmore	5
W007	Windy Ridge, Old Mill Lane, Den- mead	1
W008	Travellers Rest, Bishops Sutton	1
W009	Greenacres (Rambling Renegade), Shedfield	1
W010	Opposite Wood- ward Farm (Fore- dean Stud), Upham	1

Gypsy and Traveller Sites		
W011	Riverside (Adj Chapel House), Highbridge	3
W012	Big Muddy Farm, Alma Lane, Upham	1
W013	Land west of Lasek, Bishops Wood Road, Mislingford	1
W016	Tynefield, Whiteley Lane, Whiteley	18
W017	Ourlands, East of Mayles Lane, Knowle	3
W018	Stablewood Farm, The Lakes, Swan- more	1
W082	Beacon (Bekon) Haven, Swanmore	6
W083	Bowen Farm, Curdridge	4
W084	Little Ranch, Fishers Pond	2
	The Paddock, Durley Street	4

Gypsy and Traveller Sites		
	1 & 2 Willow Park (adj Stablewood Farm), Swanmore	2
	The Old Piggery, North Boarhunt	4
	7 The Old Piggery, North Boarhunt	1
	East of The Old Piggery, North Boarhunt	1
	Fir Tree Farm, Swanmore	3
	Gold Oaks Farm, Upham	1
	Rose View (Straightpath Paddock), Shedfield	5
	Southwick Ranch, North Boarhunt	1



Policy H13

# 9.92

Most of the need for additional pitches and plots derives from families occupying existing sites, as listed in Policy H13 to the left. An assessment of the likely capacity and deliverability for additional pitches on existing sites has been carried out which confirms that there is some capacity for appropriate intensification or expansion of some existing sites (GTAA 2022). Policy H14 below provides for the intensification of existing sites and Policy H15 would allow for expansion of an existing site or the establishment of a new site in exceptional circumstances, where necessary to meet identified needs for additional accommodation and where this can meet relevant criteria.

# 9.93

Where there is a demonstrable need for an additional pitch/plot on those sites safeguarded by this Local Plan, or for the provision of an extended or additional site, the applicant will be expected to demonstrate the need and that the lack of alternative accommodation requires an additional pitch/plot. In these circumstances the granting of any subsequent planning permission will be conditioned to limit its occupation by travellers (in accordance with the definition in the PPTS and any subsequent revision) to specifically meet the need demonstrated.

# **Policy H14**

# Authorised Traveller Site Intensification

The Local Planning Authority will consider proposals for the additional provision of pitches/plots through intensification within sites covered by Policy H13 above, on a case by case basis and in accordance with the criteria set out in Policy H12.

It will be necessary for the applicant to demonstrate the need for the additional provision in relation to local traveller needs identified in the Gypsy and Traveller Accommodation Assessment, the requirements of Policy H12, the lack of alternative provision, and the specific circumstances of the applicant that warrant intensification. Proposals should protect the living environment of existing and new residents on the site

# POLICY

# 9.94

Proposals for traveller accommodation should normally be on the sites safeguarded for traveller use by this Plan (Policy H13) or in locations where residential development is otherwise permitted (Policy H4). However, it is acknowledged that there may be cases where an exception to countryside policies (Policy SP3) may be justified, for example to meet the remaining needs of travelling households with a clear need to be located in the area. Where these meet the definition of travellers (PPTS Annex 1) but have not been able to find a suitable site within a settlement boundary or through infilling, in accordance with Policy H4, permission may exceptionally be granted on suitable sites within the countryside. There should be evidence to show that sites complying with Policy H4 have been sought, why these are not suitable or available, and the proposed site should be in a sustainable location and meet the criteria of Policy H12.

# Policy H15

# Authorised New / Expanded Traveller Sites

Proposals for new traveller sites, including expansion of the sites safeguarded in Policy H13, will be permitted within the settlement boundaries or through infilling, in accordance with Policy H4.

Sites outside the provisions of Policy H4 (other than appropriate intensification under Policy H14) will only be permitted exceptionally, where they meet an identified need for pitch or plot provision and are for occupation by persons who:

- Are defined as gypsies and travellers or travelling showpeople (Planning Policy for Traveller Sites 2015 Annex 1 or a subsequent revision); and
- Can demonstrate personal circumstances that show a strong need to be located in the area; and
- There is a lack of other suitable accommodation.

Sites should be in sustainable locations well related to existing communities and comply with the requirements of Policy H12.

# 9.95

Most current and future traveller accommodation needs are expected to be met through the intensification or expansion of existing sites, or exceptionally by permitting new sites that meet the requirements of Policy H15. There are two key travelling showpersons' sites and one substantial gypsy and traveller site that are allocated or protected by existing planning policies:

- The Nurseries, Shedfield;
- Carousel Park, Micheldever
- Tynefield, Whiteley

# 9.96

The Nurseries is largely occupied but not all plots are currently authorised. The existing allocation of the site for travelling showpersons' use is maintained so as to allow for the remaining plots to be authorised and there may be potential capacity within the site for further plots, subject to any necessary access improvements. Policy H16 therefore allocates the site for travelling showpersons' use and enforcement action will be considered if necessary to secure and retain this use for the whole site.



Land at The Nurseries, Shedfield (as shown on the maps below) is allocated for travelling showpersons' use. The whole site should be occupied by people meeting the definition of travelling showpeople, and comply with the following requirements:

- Provide suitable landscape proposals, particularly along the western boundary of the site and between the plots, to screen views and reinforce the site's visual containment;
- Avoid further expansion beyond the currently defined extent of the site;
- Consider opportunities for limited intensification, in accordance with Policy H14, subject to any necessary improvements to the access in terms of visibility;
- Satisfy the requirements of Policy H12.





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9.95 9.96

# 9.97

Carousel Park has consent for 9 large travelling showpersons' plots but most plots are not being used for travelling showpersons' purposes and have been subdivided. Given the need for travelling showpersons' plots and the difficulty in finding suitable potential sites, it is important that all the original permitted plots are made available and retained for showpersons' use. Enforcement action is being taken to reinstate the travelling showpersons' use. The disputed use and occupancy of the site makes it difficult to determine how many additional

showpersons' plots would be made available on completion of the enforcement process, but it is estimated there will be a gain of at least 8 showpersons' plots. Any changes that may result from the enforcement process, including potential intensification, should retain the use of the site for travelling showpersons, ensure an acceptable living and working environment, and meet the requirements of Policy H12.

# Carousel Park, Micheldever

Land at Carousel Park, Micheldever (as shown on the maps below) is allocated for travelling showpersons' use. The site should be occupied by people meeting the definition of travelling showpeople, and comply with the following requirements:

- Protect the biodiversity of Black Wood (an adjacent Site of Importance for Nature Conservation - SINC) and reinforce the site's visual containment by providing and retaining a bund and landscaping around the whole site boundary;
- Avoid further expansion or intensification beyond the currentlydefined extent of the site;
- Satisfy the requirements of Policy H12.





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9.97

# 9.98

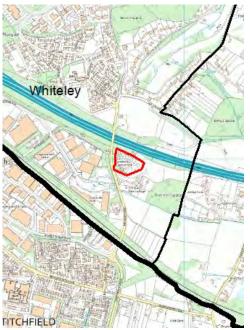
Tynefield has consent for 20 traveller pitches and was previously operated as a public site by Hampshire County Council for 18 pitches. The GTAA 2022 considers the potential to bring this vacant site back into traveller use and for intensification. It is estimated that the site could be reconfigured to accommodate about 30

pitches. The site was vacant at the time of the Gypsy and Traveller Accommodation Assessment (GTAA), so bringing it back into use and reconfiguring the site could make a substantial contribution to meeting future needs for gypsy and traveller accommodation.

# **Policy H18**

Land at Tynefield, Whiteley (as shown on the maps below) is allocated for gypsy and traveller use. The site should be occupied by people meeting the definition of travellers and comply with the following requirements:

- Be redeveloped to provide about 30 gypsy and traveller pitches, laid out to achieve satisfactory living standards and minimise disturbance form the nearby M27 motorway;
- Satisfy the requirements of Policy H12.





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