

Draft Affordable Homes in New Development Supplementary Planning Document

Summary of Representations and Draft Response

1. Hart District Council consulted on a Draft Affordable Homes in New Development Supplementary Planning Document for six-weeks from 8 November 2024 to 20 December 2024 (under Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012).
2. This document provides a summary of the representations received and the proposed response to each comment made.
3. Where changes to the SPD are proposed in response to representations received these are set out in the final column as part of the Draft Council's response. Deletions are struck through and new text is underlined.
4. 16 respondents made representations:
 - Abri (Registered Provider)
 - Anchor (Registered Provider)
 - Crookham Village Parish Council
 - Eversley Parish Council
 - Hampshire County Council Public Health Authority
 - Historic England
 - Hook Parish Council
 - NHS property services
 - Police and Crime Commissioner
 - South East Water
 - Spelthorne Borough Council
 - 5 individuals

Summary of Representations and Hart District Council's Draft Response

Row number	Consultee and rep no.	Issue raised	HDC's draft response
1	001-Individual respondent 1/01	In my view at least 20% of all new developments should be affordable homes for first time buyers etc.	No change. This would require a change of policy in the local plan, supported by fresh evidence. However, Policy H2 of the Local Plan does require 35% of homes on major development (sites of 10 or more homes) to be of an affordable home ownership tenure. This will usually be shared ownership.
2	002-Individual respondent 2/01	Any affordable homes must be situated in an urban area with transport links.	No change. Transport links are important but affordable homes are needed in smaller towns and villages not just in urban areas.
3	002-Individual respondent 2/02	The 10 homes limit is a good starting point but as I have noted previously once planning is agreed developers change the format/layout to suit their profits. Hart planning enforcement seems slow and inefficient allowing disputes to get acceptance by default. Costs for review by an inspector should be reduced if the planning is more proactive.	No change. Perceptions around enforcement etc. are noted but these are not matters that suggest a change is needed to the SPD.

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4	003-Police and Crime Commissioner- Hampshire and Isle of Wight 003/01	<p>It is our position that Policing, crime, crime prevention and consideration of Blue Light services in general within the current planning regulations are insufficient to meet the demands of a modern and growing society. We would welcome a further discussion with you regarding the proposals, what they may mean for policing and to explore what opportunities may be available to enhance public safety and public confidence as communities develop.</p> <p>We are pleased to see that there is reference to crime prevention and anti-social behaviour within your plan, however we would encourage you to consider a broader approach to how Policing can be better integrated into your plans to protect new and developing communities.</p> <p>Whilst we appreciate that the current NPPF does not specifically stipulate that plans must consider the Emergency Services, it is our response that we wish to be engaged with regards what opportunities may exist with regard S.106 and CIL contributions from any proposed developments within your plan.</p> <p>Through various groups, including the Association of Police & Crime Commissioners and National Police Estates Group, Police & Crime Commissioner Donna Jones has lobbied central government for amendments to the proposed NPPF to ensure that Blue Light Services are included as a statutory consideration for local authorities when setting out their planning objectives, subject to the various regulatory demands authorities are required to abide by.</p> <p>We would welcome a further discussion with you regarding the proposals, what they may mean for policing and to explore what</p>	<p>No change.</p> <p>These matters fall outside the remit of the SPD on affordable homes and are more for the next local plan.</p>

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		opportunities may be available to enhance public safety and public confidence as communities develop.	
5	004-Individual respondent 004/01	I think this policy reads well and I strongly support building inclusive developments so that communities can include everyone, and that everyone gets a good standard of housing.	Support noted.
6	004-Individual respondent 004/02	<p>I am bemused by the note in one of the supplementary documents that "Any objections to the Council's conclusion that the SPD is unlikely to result in any significant environmental effects will be considered after the consultation period has closed and prior to the finalisation of the SPD"</p> <p>Surely any building development has an environmental effect - we know that developments often impact on flooding for example, where natural surfaces are covered with non-porous material; and can destroy important habitats and impeded wildlife corridors. There is also an increasing trend for people to use plastic grass or pave over their gardens in order to keep things low-maintenance. I would hope that any development policy would discuss and mitigate against these impacts, and push developers to include the maximum possible outside space per dwelling, rather than squash them in with small, overlooked gardens that end up lacking natural light and with no wildlife corridors.</p>	<p>No change.</p> <p>The respondent has confused the outcome of a Strategic Environmental Assessment (SEA) Screening Opinion for this SPD with the environmental effects of actual development on the ground.</p> <p>The SEA screening process determined that the SPD will not in itself result in any significant environment effects because it does not allocate or lead to any additional development. Rather, it will influence the delivery of affordable homes on sites that would be developed in any event.</p>
7	005- Crookham Village Parish Council 005/01	Crookham Village Parish Council supports the overall thrust of the proposals but is concerned that there seems to have been little consideration of the potential effect of the associated increase in costs for the developer on provision of essential infrastructure and services to support the development.	<p>No change.</p> <p>The approach set out in the draft SPD is supported by recent evidence related to viability: Viability Findings Note - Impact of social</p>

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			<p>rented homes on development viability.</p> <p>Current policies to require necessary infrastructure remain in place.</p> <p>If the applicant robustly demonstrates that the full affordable housing requirement is unviable in addition to necessary infrastructure, then a reduced affordable housing provision can be negotiated.</p> <p>Further information on viability can be found in the Council's Viability Appraisals for New Development Supplementary Planning Document.</p>
8	007 – Spelthorne Borough Council 007/01	Welcome the reference under 3.6 to the proposed reforms to the NPPF and assume when these are confirmed the SPD will be updated accordingly.	Correct that the SPD will be updated accordingly – these are shown as “Other Modifications” i.e. changes made to the SPD <i>not</i> in response to comments received through consultation.
9	008 –Hampshire County Council - Public Health Authority 008/01	<p>Whilst the County Council does not have statutory housing duties, it recognises that the provision and design of homes plays an important role in achieving healthy places.</p> <p>The NPPF states that planning policies should aim to achieve places and buildings which address identified local health and well-being needs.</p>	<p>No change.</p> <p>This general comment sets the context for subsequent representations on different parts of the SPD.</p>

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10	008 – Hampshire County Council - Public Health Authority 008/02	Paras 3.1-3.5 SPD could make clear reference to NPPF Section 8 “Promoting healthy and safe communities” which addresses the health and wellbeing of the Hart population.	Proposed amendment. Section 8 of the NPPF does not actually refer to affordable housing in the context of promoting healthy and safe communities, although mixed and balanced communities coupled with good design and other factors do contribute positively. Amend para 2.1 as follows: 2.1 The delivery of mixed and balanced communities is a key element of good planning <u>and helps to promote healthy and safe communities</u> . The provision of a choice of new homes, including well-integrated affordable homes is integral to this.
11	008 – Hampshire County Council - Public Health Authority 008/03	Paras 3.7-3.8 Recommend including references to the Joint Strategic Needs Assessment (JSNA) Joint Strategic Needs Assessment (JSNA) Health and social care Hampshire County Council (hants.gov.uk) and the Hampshire Public Health Strategy Public Health-Strategy 2023.pdf (hants.gov.uk) within this section of the SPD. These key documents are essential to help support affordable housing needs and the health and wellbeing objectives within the Hart Local Plan.	No change. These references are unnecessary for this SPD, but the evidence referred to may be used when preparing the next local plan.

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12	008 – Hampshire County Council - Public Health Authority 008/04	<p>Para 4.48</p> <p>The Public Health Authority recommends a requirement for private amenity for flats and apartments as there is a strong evidence linking usable outdoor amenity space and resident's health and well being. This has been borne out of experience and evidence from the COVID19 pandemic and is also set out within the Building for a Healthy Life Guidance (2020) design toolkit.</p>	<p>Proposed amendment.</p> <p>Agree that this is an important issue that could be emphasised more. Insert new paragraph after paragraph 4.48 as follows:</p> <p><u>Outdoor space and healthy living</u> Gardens and outdoor amenity space</p> <p>4.48 Private gardens should be provided for residents of all houses. Outdoor amenity space should also be provided for occupiers of flats, with private gardens provided where possible, particularly in relation to maisonettes and small blocks of flats. Where it is not possible to provide garden space for flats (whether that be private or communal), outdoor amenity space should be well designed and provided in the form of usable balconies or well-designed, easily accessible landscaped areas.</p> <p>New para:</p> <p><u>Provision of private outdoor amenity space is an important consideration in the design of a development. The</u></p>

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			<p><u>Public Health Authority has stated that there is strong evidence linking usable outdoor amenity space and residents' health and wellbeing which has been borne out of experience and evidence from the Covid 19 pandemic. The Building for a Healthy Life Design Toolkit states that people should be offered access to at least some private outdoor space, and that "This is particularly important for people's health and wellbeing especially when social distancing and travel restrictions are in place."</u></p>
13	008-Hampshire County Council - Public Health Authority 008/05	<p>Paras 4.44-4.45</p> <p>Advise inclusion of the HAPPI guidance in provision of specialist housing. This outlines best practice design approaches in relation to the layout, design and built form of housing for an ageing population HAPPI - Design - Topics - Resources - Housing LIN.</p>	<p>Proposed amendment.</p> <p>Agree to refer to this guidance within the section on Specialist housing by adding the following:</p> <p><u>Best Practice guidance on the planning and design of specialist accommodation for older people is available from Housing our Ageing Population Panel for Innovation (HAPPI)-Design Principles."</u></p>
14	008 Hampshire County Council -	Para 4.49	No change.

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	Public Health Authority 008/06	In 2021, around 20% of Hart's population was aged 65 years or older Hampshire Joint Strategic Needs Assessment. It was also reported that 11.6% of people aged 65 and over in Hart have moderate or severe frailty, 18.9% have reduced mobility, and 26.7% are experiencing falls. The draft outlines the application of Policy H2 of HLP32, which mandates that 15% of all affordable homes must be accessible and adaptable (Section 4.49). As part of a Future Local Plan review, it is advised that this percentage is reviewed, as 15% is relatively low considering these and other potential life-changing circumstances residents may face.	Agree that this is a matter for the next local plan.
15	008 Hampshire County Council - Public Health Authority 008/07	<p>Standards and Healthy Homes</p> <p>Public Health supports the Town and Country Planning Association's (TCPA) Healthy Homes Principles - Town and Country Planning Association (tcpa.org.uk) and would recommend that where possible the 11 principles are considered where appropriate. To assist the Health Foundation set out key health benefits of decent home standards Moving to healthy homes - The Health Foundation. A healthy home should be a safe and accessible environment, free from hazards. It should be efficiently heated to a healthy temperature, provide a sense of security, and have modern facilities.</p> <p>Healthy streets</p> <p>Recommend that the SPD considers Hampshire's recently adopted Local Transport Plan 4 (LTP4), in particular the health and wellbeing and climate thread which runs through the document as well as the approach to street design through the Healthy Streets approach What is Healthy Streets?</p>	<p>Proposed amendment.</p> <p>Agree to refer to this guidance in a new paragraph under the revised 'Outdoor space and healthy living' heading:</p> <p><u>Access to outdoor space is one factor in promoting healthy living but there are many other aspects to this. Some additional sources of guidance are listed below:</u></p> <ul style="list-style-type: none"> • Town and Country Planning Association: Healthy Homes Principles • The Health Foundation: Moving to healthy homes

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			<ul style="list-style-type: none"> • Healthy Streets (an aspect of the Hampshire Local Transport Plan 4)
16	008 Hampshire County Council - Public Health Authority 008/09	<p>Design and Placemaking</p> <p>Consideration of the wider neighbourhood and environments would be helpful within the draft affordable housing SPD, as the street and neighbourhood created is equally important to the home. An example of good practice is Fareham's Affordable housing SPD where the aspirations for healthy design outcomes, tenure blind design, cycle parking and Affordable Housing Topic Additional guidance and signposting space standards are set out within expanded guidance Affordable Housing SPD 2024.</p>	<p>No change.</p> <p>This would broaden the intended scope of the SPD and lead to delay. In any event the SPD does cover some of these issues (e.g. tenure blind) and cross refers to relevant national and local guidance including Building for a Health Life, 2020 and the National Design Guide 2021. Good design is a requirement of current local plan policy NBE9 Design, and the Council has an adopted SPD specifically on cycle and car parking with new development.</p>
17	008 Hampshire County Council - Public Health Authority 008/11	<p>Other design considerations include:</p> <ul style="list-style-type: none"> • Active travel requirements as this is an effective way to encourage more physical activity Active Travel Toolkit - The role of active travel in improving health - Sustrans.org.uk, which supports people to maintain a healthy body weight and is proven to help prevent and manage diseases such as heart, disease, stroke, diabetes, and some cancers. There are also benefits for mental health and wellbeing including coping with stress, 	<p>No change.</p> <p>Whilst the Council supports active travel and access to greenspace, a line has to be drawn as to the scope of guidance within the SPD, the purpose of which is to support Policy H2 Affordable Housing in the Local Plan.</p>

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		<p>improving concentration and sleep, and reducing symptoms of depression and stress.</p> <ul style="list-style-type: none"> • Access to public green space, particularly for developments that are in more deprived neighbourhoods. Living close to areas of localised green space, parks, woodland and other open space can improve physical and mental health regardless of social background Improving access to greenspace: 2020 review (publishing.service.gov.uk). Access to, and engagement with, the greenspace and natural environment is associated with numerous positive physical and mental health outcomes and can support a reduction in health inequalities. These include promoting healthier behaviours, such as physical activity and active travel, enabling greater social cohesion giving people a sense of familiarity, and supporting the development of skills and capabilities Improving access to greenspace: 2020 review (publishing.service.gov.uk). Greenspace also supports better mental health through reducing feelings of stress and anger, reducing loneliness, and improving confidence and self-esteem How nature benefits mental health - Mind, Urban green spaces and health: A review of evidence (World Health Organisation). • A range of play spaces for children of all ages and younger adults as regular participation in physical activity among children and young people is vital for healthy growth and development. 	<p>Active travel and greenspace are covered by other Local Plan policies on Transport, Green Infrastructure and Open Space, Sport and Recreation.</p> <p>The SPD cannot become a repository for links to documents addressing a myriad of different planning issues.</p>
18	009 Eversley Parish Council 009/01	EPC supports the concept of socially rented homes that allow residents to stay within their rural villages.	Support noted.

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19	011 Historic England 011/01	Our only comment is to suggest a slight amendment to paragraph 4.11 as follows: "In applying the above standards the Council will also take into account the context of the site, <u>the historic environment</u> and local character. However, if the site is in an area of low density development, then it should not automatically be concluded that a higher density development would result in harm."	No change. The proposed change is unnecessary. Paragraph 4.11 does not need to refer to all individual aspects that make up site context and character.
20	012 Hook Parish Council 012/01	Hook Parish Council is concerned generally about the high proportion of affordable housing proposed and if this will be successful.	No change. The percentage of affordable homes required in new developments is set by Policy H2 of the HLP32.
21	012 Hook Parish Council 012/02	1. There should perhaps be greater flexibility on provision of AH. - It may be useful if the SPD set out how the 40% can be achieved. Policy H2 suggests the "part dwellings" (decimals in the calculation) are delivered as an equivalent financial contribution (Policy H2f, and para 4.56 of the SPD repeats this), but there should be an opportunity for a rounded-up "over-provision" as well.	No change. It's not clear what is meant by greater flexibility being needed. Inherently there is flexibility within both the policy and guidance in many ways, but it is also important to provide policy and guidance so that developers and stakeholders can understand and work to the Council's expectations. Regarding 'rounding up' this cannot be introduced into the SPD as it would change the policy on which it is based. This is something that was considered at the Local Plan

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			examination and is not open to change through the SPD.
22	012 Hook Parish Council 12/04	<p>2. Clarify the term Social Rent.</p> <p>- Para 4.16 of the SPD sets out that: "A key purpose of the SPD is to clarify the Council's approach to the 65% affordable homes for rent ... The 65% 'affordable homes for rent' are required to be provided in the form of Social Rented homes."</p> <p>Unfortunately, the term Social Rent is not clearly defined in the main text or the glossary, it is just noted as being set lower than Affordable Rent (para 4.17).</p>	Social Rent has been more clearly defined in the December 2024 NPPF. This definition is repeated in the Glossary to the updated SPD (see "Other Modifications" row 10).
23	012 Hook Parish Council 12/05	<p>3. Ensure that AH cannot simply be provided as flats in schemes with houses.</p> <p>- The SPD (para 4.36) suggests if the market homes in a scheme are predominantly houses then the affordable homes should also be houses and not confined to flats. This could be stronger and clearer to ensure developers know they cannot simply accommodate all or even most the affordable housing in apartments. There is no sense of what proportion may be acceptable.</p> <p>4. The preference for 3 and 4 bed houses and not flats should be stronger.</p> <p>- The SPD reads that HDC prefer affordable houses to affordable flats and are not keen on 1-bed flats, but it is not explicit. It does however firmly state that all 3+ bed properties should be provided as houses (para 4.39) and that affordable housing should not comprise detached properties. Given the most acute affordable housing need is stated as 3 and 4- bed social rent housing, the</p>	<p>Proposed amendment.</p> <p>Agree there is scope to clarify the "Property types and sizes" section of the SPD as follows:</p> <p>Property types and sizes</p> <p>4.36 The types of affordable homes provided should normally reflect the types of market homes proposed for the site. For example, if the market homes are predominantly houses, then the affordable homes should also be predominantly houses. This will help to address local housing needs and to achieve a 'tenure-blind' development.</p>

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		<p>position on not favouring flats particularly for all social rent, should be made equally unequivocal.</p>	<p>4.37 The most acute affordable housing need is for Social Rented 3-bedroom and 4-bedroom houses. These should form part of the mix on suitable sites, particularly where 3-bedroom and 4-bedroom market houses are proposed.</p> <p>4.38 The Council prefers <u>To best address local needs the affordable homes should be provided as to be houses (as semi-detached or small rows of terraced homes) rather than flats (unless the site is better suited entirely for market and affordable flats).</u> In some instances, the Council may request bungalows, maisonettes or 1-bed houses to be delivered. <u>3 bedroom or larger homes must be provided as houses as these are to address the need for family homes where private garden space is particularly important.</u></p> <p>4.39 2-bedroom houses rather than 2-bedroom flats should be provided wherever possible,</p>

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			and all 3+ bedroom properties should be provided as houses.
24	014 Abri 014/01	As one of the largest housing providers based in the south of England, with over 400 homes in the district, we are proud to work collaboratively with the Council to deliver more homes for those in need, in communities where everybody has the opportunity to belong, grow and thrive. Our comments on the SPD focus on how this guidance can best support delivery.	No change. Comments noted.
25	014 Abri 014/02	As noted in para. 3.6 of the draft SPD, this guidance will now require some minor updates to reflect the newly published National Planning Policy Framework (NPPF) which amended the Annex 2 definition of affordable housing and policy expectations for how affordable housing is to be prioritised.	Correct that the SPD will be updated accordingly – these are shown as “Other Modifications” (i.e. changes made to the SPD <i>not</i> in response to comments received through consultation) in a separate schedule.
26	014 Abri 014/03	The planning protocol noted at paragraph 5.2 could also be updated to reflect the amended policy approach to the presumption in favour of sustainable development now set out in the NPPF which specifically highlights the provision of affordable homes as a benefit of development to be given particular weight.	Proposed amendment. The planning protocol document is separate from the SPD but agree to reflect this point in an update to Section 3 of the SPD which sets out the national planning policy context. New paragraph: <u>NPPF paragraph 11(d)ii highlights affordable housing as one of the key policies when determining planning applications under the ‘presumption in favour of sustainable</u>

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			development' (where there are <u>no relevant development plan policies, or the policies which are most important for determining the application are out-of-date).</u>
27	014 Abri 014/04	<p>Amount and tenure mix of affordable homes</p> <p>It is important to note that the role of supplementary planning documents is restricted to providing additional guidance on the interpretation of local plan policies, and not to provide further policies. The introduction of specific restrictions in such guidance is expressly noted in the national Planning Practice Guidance as not forming part of the development plan, though capable of being a material consideration, and “should not add unnecessarily to the financial burdens on development”.</p> <p>This is notable as the mandatory expression of tenure preference in this section of the draft SPD appears to go beyond this guidance, requiring viability appraisal for developments that propose to bring forward affordable rent or a mix of social and affordable rent. As Policy H2 seeks affordable housing “of a size and type which meets the requirements of those in housing need” there is scope within the policy to tailor tenure mix to local housing need. The amendments to the NPPF place an increased emphasis on the delivery of social rent and that is a material consideration, however any change to policy now needs to be undertaken through a review of the local plan policy. The guidance should be updated to reflect the Council’s preference instead of a requirement.</p>	<p>No change.</p> <p>The Council is not introducing a new development plan policy, it is clarifying how Policy H2 will be implemented, particularly regarding the 65% affordable homes for rent element of the tenure split in Policy H2.</p> <p>It is doing this through an SPD which by definition is a material consideration rather than a new policy.</p> <p>Local Plan Policy H2 and the supporting text remain in place.</p> <p>Para 138 of the supporting text states that the exact mix of affordable housing on each site in terms of types, sizes and tenures will be agreed through negotiation with the developer. It refers to various evidence and information that will feed into that negotiation</p>

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			<p>and encourages applicants to check the latest guidance. Footnote 8 refers to Hart's Informal Affordable Housing Development Guidance, August 2017 or subsequent updates. This SPD supersedes the previous informal guidance, provides greater clarity on the Council's expectations, is underpinned by relevant evidence and has gone through a statutory process.</p> <p>The SPD is not adding significant costs to development – the requirements remain 'subject to viability'. Whilst a viability appraisal might now be necessary where before it was not, this is not an unusual requirement where affordable housing is negotiated.</p>
28	014 Abri 014/05	<p>Content of Section 106 legal agreement. We ask that the guidance include reference to mortgagee in possession (MiP) clauses as these standard clauses enable Registered Providers such as Abri to provide for circumstances of defaults on loan payments or other loan or mortgage terms, while also allowing RPs to maximise the value of these homes, to secure further delivery. The inclusion of these standard clauses, supported by</p>	<p>Proposed amendment.</p> <p>Agree. The Council already uses the National Housing Federation wording in its Section 106 agreements to meet this requirement by the Registered Providers.</p>

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		the National Housing Federation, supports Homes England grant funding.	<p>Add bullet point to the list of matters a section 106 agreement will normally cover set out at para 5.11:</p> <ul style="list-style-type: none"> • <u>a standard Mortgagee in Possession (MIP) clause supported by the National Housing Federation.</u>
29	015 Individual Respondent 015/01	I think that you should build up rather than out. The flats will need to be sonically isolated from one another but they can be used to create communities and they are relatively easy to keep warm and cool. If you need help managing then contact Singapore, if you need help building then contact China.	<p>No change.</p> <p>This point is about options for housing growth in a wider sense rather than the application of the Council's current affordable housing policy.</p>
30	016 – Anchor 016/01	Para 2.4 - Consideration to include proximity to local amenities and services and good transport links.	<p>No change.</p> <p>Para 2.4 quotes the Corporate Plan which cannot be changed via this SPD.</p> <p>In any event the quote from the Corporate Plan does refer to “sustainable locations”. Ideally affordable is in proximity to service and good transport links but equally affordable homes are also needed in more rural settlements.</p>

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31	016 – Anchor 16/02	4.10 - Retirement/older persons housing mix to be different from general needs housing i.e. focus on predominantly 1 bed with some 2 beds.	<p>No change.</p> <p>This part of the SPD aims to ensure efficient use of land, avoiding low densities which might artificially generate numbers of homes below the 10-unit site size threshold that triggers the affordable housing policy.</p> <p>Retirement/older persons housing will generally by its nature deliver relatively high-density development as it is predominantly one and two-bed accommodation.</p>
32	016 – Anchor 16/03	4.14 - If local needs/demand supports this, will need some flexibility around this.	<p>No change.</p> <p>Paragraph 4.14 simply re-states the 65%:35% tenure mix enshrined in the HLP32 Policy H2 criterion (c).</p> <p>It is important that this start-point, with the 65% element being for social rented homes, is made clear.</p> <p>This does not remove the scope for flexibility where circumstances require.</p>
33	016 – Anchor 16/04	4.24 - Delivering affordable/social rent for older person, which is more expensive to build, land value is often required to be nil or £1 receipt to ensure developments are viable. If not, there is a	<p>No change.</p> <p>The draft SPD recognises the viability issues with older persons</p>

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		funding gap and funding from LA commuted sums or other pots is often required to ensure viability.	accommodation at paragraph 4.55 indicating that the affordable housing contribution, whether on or off-site, will be as much as is viable on a site-by-site basis informed by the viability assessment. Para. 4.55 also already encourages early discussions with the Council in these circumstances.
34	016 – Anchor 16/05	4.26 - Cannot emphasise enough that a joined-up approach with planning and housing strategy is required to ensure demand is reflected in planning.	No change. The Draft SPD was prepared jointly with Housing Strategy Officers, and there is joint working on planning applications. Nevertheless the comment is noted.
35	016 – Anchor 16/06	<p>Paragraph 4.33 states:</p> <p><i>“4.33 Blocks of flats should consist of homes of the same tenure, i.e., just rented, or just shared ownership and not a mix. A maximum of 12-15 flats should be provided together in one block. They should be well distributed across the whole site and across any given phase.”</i></p> <p>Is this approach flexible to meet future market demand with an older persons specialist accommodation in mind?</p> <p>Paragraph 4.40 states:</p>	<p>Proposed amendment.</p> <p>Add new paragraph after paragraph 4.55 to clarify that whilst the SPD will apply to some forms of older persons accommodation, flexibility may be justified for other forms of older persons accommodation such as Extra Care as follows:</p> <p><u>In cases of on-site provision, early discussions with the Council will clarify how the guidance in this SPD should be applied to that specific</u></p>

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		<p><i>“4.40 Where flats are considered acceptable, consideration should be given to the mix of 1 and 2-bed units. A small number of 1 bed flats within a block of 2-bed units may be acceptable if they are designed to minimise the risk of potential anti-social behaviour issues arising from households with children living in close proximity to households without children.”</i></p> <p>This doesn't take into consideration older persons specialist accommodation which would be predominantly 1 bed with some 2 beds, usually 80% 1 bed, 20% 2 bed, with some communal spaces.</p> <p>Paragraph 4.43 states:</p> <p><i>“4.43 Affordable homes should enable maximum occupancy levels as follows:</i></p> <ul style="list-style-type: none"> <i>• 1-bed homes accommodate 2-persons;</i> <i>• 2-bed homes accommodate 4-persons;</i> <i>• 3-bed homes accommodate 5 or 6 persons; and,</i> <i>• 4-bed homes accommodate 6, 7 or 8-persons.”</i> <p>In older persons accommodation sometimes a 2 bed property would be for 3 persons, not 4 as the 2nd bedroom may be a single room.</p>	<p>site or proposal. For example, the Council may take a more flexible approach in relation to supported accommodation such as Extra Care in terms of size, mix and occupancy. However, these matters will need to be looked at on a case-by-case basis. Best Practice guidance on the planning and design of specialist accommodation for older people is available from Housing our Ageing Population Panel for Innovation (HAPPI)-Design Principles.</p>
36	016 – Anchor 16/09	4.51 - it is more expensive to build M4(3) and consideration needs to be taken around funding this and viability.	No change.

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			<p>Noted. The SPD is referring to existing Local Plan Policy H2 regarding wheelchair user homes.</p> <p>Any costs associated with this would be factored into a viability assessment.</p> <p>The draft SPD does state at paragraph 4.52: "The requirement for wheelchair user homes Part M4(3) should be discussed with the Housing Strategy and Development Team via the planning application Case Officer as early as possible in the planning process and provided in accordance with the accessible homes guidance produced by the Council."</p>
37	016 – Anchor 16/10	4.55 - A financial contribution would affect viability.	<p>No change.</p> <p>Paragraph 4.55 of the SPD sets out that any contribution, whether on-site, off-site, or in the form of a financial contribution, would be as much as is viable and informed by a viability assessment.</p>
38	016 – Anchor 16/11	5.1 - Consider having a specialist planning officer for specialist older persons accommodation both retirement and extra care.	No change.

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			Comment noted, but this is not part of the current set-up for pre-application advice.
39	016 – Anchor 16/12	Para 6.7 Meeting LHA threshold is often challenging for older persons specialist housing, considering the design, layout, facilities and services in the buildings which brings with it a service charge. Is there is any flexibility for older persons specialist accommodation? Extra Care accommodation would expect to be exempt.	No change. Rather than change the guidance to cater for 'non-standard' circumstances, these matters should be discussed with the Council if there are genuine issues complying with the guidance.
40	016 – Anchor 16/13	Para. 6.10 Wouldn't want any affordable units tied up in the S106, however, can be reflected in the planning decision notice. We can't obtain grant funding for affordable units tied up in S106 which affects viability.	No change. It has been a long-standing approach of Homes England (and their predecessors the Homes and Communities Agency) that they will not provide grant funding for affordable homes delivered on S106 sites - i.e. on sites where in line with Local and National policy a proportion of affordable homes are required to be provided on site through a S106 legal agreement. In these cases, the cost of providing the affordable homes is expected to come off the land value.
41	017 Individual Respondent	...we object on the following basis:	No change.

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	017/01	This consultation should have been open for a 12-week period and not a lesser timeframe.	<p>The Council consulted on the draft AH SPD for a period of 6 weeks between the 8 November 2024 and the 20 December 2024.</p> <p>This exceeds the statutory 4-week consultation period required by the legislation set out at Regulation 12(b)(i) of the Town and Country Planning (Local Planning) (England) Regulations 2012.</p>
42	017 Individual Respondent 017/02	The calculations and formulas used are ad hoc and with no rhyme or reason, i.e. no valuer or financial institution in the Country calculates development land value at 38% of GDV. Why aren't RIC's valuation figures used in the formulas?	<p>No change.</p> <p>These comments relate to the Affordable Housing Financial Contributions Calculator and associated Affordable Housing Financial Contributions Technical Advice Note which did not form part of the consultation on the draft SPD.</p> <p>These comments would be relevant if or when the Affordable Housing Calculator is reviewed.</p>
43	017 Individual Respondent 017/03	We also believe the consultation technical note is contrary to the recently published NPPF in December by the Government especially relating to paragraphs 57, 58 and 59.	<p>No change</p> <p>Paragraphs 57-59 of the NPPF, 2025 specifically relate to planning conditions and obligations and their appropriate use in relation to planning permissions.</p>

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			<p>The SPD does comply with the NPPF in this regard.</p> <p>The comment made does not explain why they think the SPD is contrary to the NPPF.</p>
44	018 – South East Water 0818/01	<p>From a water supply perspective, we would like to emphasise the need for any properties to be as water efficient as possible, particularly with regards to new affordable homes and customers that may need support in keeping their water bills as low as possible. If possible, we would like to see this reflect in the SPD and supporting documentation as at present we couldn't see any reference to water supply or water efficiency within new homes or developments.</p> <p>As set out in our recently published Water Resources Management Plan (WRMP), here: https://www.southeastwater.co.uk/about/our-plans/future-water/, our aim of reducing household consumption to reach our per capita consumption ambition of 110 litres per person per day by 2050 requires the use of new approaches and technology, including smart metering. The savings are stretching and will be challenging to deliver especially given the impacts that affluence, temperature and rainfall have on our regional water use.</p> <p>It is recognised that, if we work in isolation, it is unlikely we will be able to achieve the levels of per capita consumption included in our forecast. Our ambitious water efficiency strategy, alongside the water labelling of all water using products (already committed to by government), will achieve the forecast per capita consumption reductions required in the shorter term. Longer term</p>	<p>No change</p> <p>The Council does recognise the need for water efficiency and already has a policy - NBE7- Sustainable Water Use in its adopted local plan which requires all new homes to meet the water efficiency standard of 110 litres/person/day.</p> <p>This could be an issue for the next local plan rather than this SPD.</p>

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		<p>we have made assumptions that wider initiatives will drive water efficiency, and examples include mandated water labelling (with minimum standards), stricter mandated building codes, design and regulations as well as national water efficiency messaging, policies and targets.</p> <p>South East Water strongly supports any commitment to sustainable design of new residential and commercial development. As the South East is an area of serious water stress, it's therefore appropriate to apply as a minimum the optional building regulations standard of 110 litres per person per day for new development as a minimum water efficiency standard. We believe, and strongly encourage local planning authorities to consider, that all new homes should be built to a minimum standard of 100 litres per person per day, and that proposals should demonstrate how the design will be achieved using the methodology set out in the Building Regulations, with the design performance presented as part of the Sustainability Statement.</p>	
45	019 – NHS Property Services 019/01	<p>NHS Property Services (NHSPS) manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare environments. We partner with local NHS Integrated Care Boards (ICBs) and wider NHS organisations to help them plan and manage their estates to unlock greater value and ensure every patient can get the care they need in the right place and space for them. NHSPS is part of the NHS and is wholly owned by the Department of Health and Social Care (DHSC) – all surplus funds are reinvested directly into the NHS to tackle the biggest estates challenges including space utilisation,</p>	<p>No change.</p> <p>The Council does appreciate the benefits of key worker housing and through its arms-length housing company, Butterwood Homes, provides a number of flats for key workers at Edenbrook Village, Fleet.</p> <p>However, key workers that meet the housing allocations criteria do of course qualify for affordable housing</p>

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		<p>quality, and access with the core objective to enable excellent patient care.</p> <p>Our detailed comments set out below are focused on ensuring that existing housing affordability issues for NHS workers as essential/key workers can also be addressed and considered within the SPD.</p> <p>As drafted, paragraph 2.6 highlights that one of the Council's four-year goals within the Corporate Plan identifies the need for more affordable homes for the local people and key workers. In undertaking further work on local housing needs, we suggest the Council consider the need for affordable housing for NHS staff and those employed by other health and care providers, as key workers in the local authority area. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff.</p> <p>Housing affordability and availability can play a significant role in determining people's choices about where they work, and even the career paths they choose to follow. As the population grows in areas of new housing development, additional health services are required, meaning the NHS must grow its workforce to adequately serve population growth. Ensuring that NHS staff have access to suitable housing at an affordable price within reasonable commuting distance of the communities they serve is an</p>	<p>that is provided with new development.</p>

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		<p>important factor in supporting the delivery of high-quality local healthcare services. We recommend that the Council:</p> <ul style="list-style-type: none"> • Engage with local NHS partners such as the local Integrated Care Board (ICB), NHS Trusts and other relevant Integrated Care System (ICS) partners. • Ensure that the local need for affordable housing for NHS staff is factored into housing needs assessments, and any other relevant evidence base studies that inform the local plan (for example employment or other economic policies). • Consider site selection and site allocation policies in relation to any identified need for affordable housing for NHS staff, particularly where sites are near large healthcare employers. 	