

The Rushmoor Plan: Affordable Housing Supplementary Planning Document (SPD)

Consultation Statement

Regulation 12 Town and Country Planning (Local Development) (England) Regulations 2012

Persons consulted when preparing the supplementary planning document

The Draft Affordable Housing SPD was subject to public consultation for a period of 6 weeks between 3 June 2019 and 15 July 2019. Copies of the draft document and supporting information (namely a Strategic Environmental Assessment Determination and the Statement of Matters and Availability (see Appendix 1)) were made available to view at the following locations during opening hours:

- Rushmoor Borough Council Offices
- Aldershot Library
- Farnborough Library

The SPD and supporting information were also made available to view online at <https://www.rushmoor.gov.uk/planningpolicyconsultations> (see Appendix 2) and also promoted on the Council's homepage (Appendix 3) and Planning service homepage (Appendix 4).

Representations were invited via post or via email.

Consultation emails

The Council notified all registered members on the Rushmoor Local Plan consultation database. The database covers a wide range of stakeholders including local residents, businesses, statutory bodies such as English Heritage and civic groups such as the Farnborough Society and Aldershot Civic Society. In total, there are approximately 900 contacts on the database. All members were contacted via email (see Appendix 5).

Documents available on the Council's website

Copies of the draft SPD and the Strategic Environmental Assessment Determination were made available to view/download on the Council's website at <https://www.rushmoor.gov.uk/planningpolicyconsultations>

Summary of the main issues raised by those persons

A total of five individuals and organisations responded to the draft SPD. The comments made are set out in full in the schedule attached as Appendix 6.

There was general support for the SPD with recognition that truly affordable homes can help to reduce inequalities and support broader health, social and economic benefits. In addition, support was expressed for the affordable homes to be tenure blind, although it was expressed that the requirement for even dispersal of affordable units across the site to be strengthened.

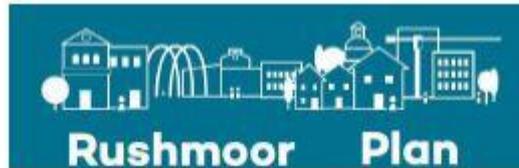
Concern was expressed that the recently adopted Local Plan is based on the 2012 NPPF and a SHMA published in 2016. As a result, neither relate to the revised version of the NPPF and specifically the definitions of affordable housing now set out in Annex 2.

A respondent suggests that the Council should consider producing a SHMA addendum, considering the extent of needs for affordable rent to buy, and how the SPD can better implement Policy LN2 in the context of the updated NPPF.

How those issues have been addressed in the supplementary planning document

The Officer comments relating to these concerns and how they have been addressed in the final version of the SPD can be found in Appendix 6.

Appendix 1 Statement of SPD Matters and Availability



Draft Affordable Housing Supplementary Planning Document (SPD)

Statement of SPD Matters and Availability

Regulation 12 Town and Country Planning (Local Development) (England) Regulations 2012
(as amended)

Title: Draft Affordable Housing Supplementary Planning Document (SPD)

Area Covered: Rushmoor Borough

Subject Matter: The Affordable Housing SPD seeks to provide further guidance to support the implementation of the affordable housing policy of the Rushmoor Local Plan (Policy LN2: Affordable Housing) and the housing delivery objectives of the Rushmoor Housing and Homelessness Strategy 2017-2022.

Representation Period: 03 June 2019 – 5pm 15 July 2019

Copies of the draft documents and the supporting information are available to view at:

- **Rushmoor Borough Council Offices** between 8:30am and 5pm Monday to Thursday, and between 8:30am and 4:30pm Friday
- **Aldershot Library**, 109 High Street, Aldershot, Hampshire GU11 1DQ at the following times:
 - Monday to Wednesday - 9.00am - 5pm
 - Thursday 9.00am - 7pm
 - Friday and Saturday 9.00am - 5pm
- **Farnborough Library**, Pinehurst, Farnborough, GU14 7JZ at the following times:
 - Monday to Thursday - 9.30am - 6pm
 - Friday - 9.30am - 7pm
 - Saturday 9.30am - 5pm
- **Online at** www.rushmoor.gov.uk/planningpolicyconsultations

Representations to be sent to:

Planning Policy, Rushmoor Borough Council, Council Offices, Farnborough Road,
Farnborough, Hants GU14 7JU

Or by email to planningpolicy@rushmoor.gov.uk

Adoption Notification: If you wish to be notified of the adoption of this SPD, please request this as part of your submissions.

Appendix 2 Planning Policy Consultations webpage

Planning policy consultations

You are in Planning
Planning policies
The Rushmoor Local Plan
Supplementary planning documents and advice notes
Get involved in developing our planning policies
Statement of Community Involvement
Planning policy consultations
Community Infrastructure Levy and planning obligations
National, regional and county planning policy documents
Neighbourhood planning
Former local plans and policies

We are consulting on the Draft Affordable Housing Supplementary Planning Document (SPD) and the Draft Statement of Community Involvement (SCI).

Current consultations

Draft Affordable Housing Supplementary Planning Document (SPD)

The purpose of the Draft Affordable Housing SPD is to provide further guidance to support the implementation of the affordable housing policy of the recently adopted Rushmoor Local Plan (Policy LN2: Affordable Housing) and the housing delivery objectives of the Rushmoor Housing and Homelessness Strategy 2017-2022.

You can read the The draft Affordable Housing SPD, Statement of Matters and Availability, and Strategic Environmental Assessment (SEA) Screening Assessment / Habitats Regulations Assessment (HRA) Screening Assessment below.

-  [Affordable Housing SPD - Consultation Draft \[729kb\]](#)
-  [Affordable Housing SPD - Statement of Matters and Availability \[151kb\]](#)
-  [Affordable Housing SPD - SEA HRA Screening \[322kb\]](#)

Draft Statement of Community Involvement (SCI)

The production of a Statement of Community Involvement (SCI) is a legal requirement and its purpose is to set out how people and groups can engage with the planning system in the best way.

Following the adoption of the Rushmoor Local Plan, we have produced a consultation draft SCI (2019), which you can read below:

-  [Draft Statement of Community Involvement 2019 \[855kb\]](#)
-  [SCI 2019 - Statement of Availability \[150kb\]](#)

Upon adoption, the Statement of Community Involvement (2019) will supersede the current SCI (2013).

Have your say

You will need to send your comments on the draft documents to us by using one of the methods below.

Email

planningpolicy@rushmoor.gov.uk

Post

Planning Policy
Rushmoor Borough Council
Council Offices
Farnborough Road
Farnborough
Hampshire
GU14 7JU

The closing date for both of the consultations is 5pm on Monday 15 July.

Related documents

-  [Affordable Housing SPD - Consultation Draft \[729kb\]](#)
-  [Affordable Housing SPD - Statement of Matters and Availability \[151kb\]](#)
-  [Affordable Housing SPD - SEA HRA Screening \[322kb\]](#)
-  [Draft Statement of Community Involvement 2019 \[855kb\]](#)
-  [SCI 2019 - Statement of Availability \[150kb\]](#)

[▶ Help with PDF documents](#)

Contacts

Planning policy

planningpolicy@rushmoor.gov.uk

Tel: 01252 398735

[▶ View full details](#)

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Appendix 3 Council homepage

The screenshot shows the Rushmoor Borough Council website in a browser. The address bar displays 'https://www.rushmoor.gov.uk/home'. The navigation menu includes: Home, Your Council, Environment, Planning, Housing and Benefits, Community and Leisure, Business and Licensing, Travel and Parking, Health and Support, Education, and About Rushmoor. A search bar is located in the top right corner with the text 'Do it online', 'A-Z', 'Enter a keyword', and 'Search'. The Rushmoor Borough Council logo is prominently displayed on the left side of the header.

Planning policy consultations

Have your say on planning policies about affordable housing and community involvement.

▶ Read more about Planning policy consultations

The banner features a background image of a public consultation display with various informational panels and a printer. Below the main text, there are four colored buttons: Aldershot Lido (pink), Planning policy consultations (blue, highlighted with a red border), Our parks and open spaces (orange), and Aldershot and Farnborough (green).

Latest news

Zero tolerance on littering leads to expensive court date for Farnborough man

A Farnborough man has been ordered by the courts to pay ...

Antisocial behaviour must stop

Unreasonable antisocial behaviour caused by a few ...

▶ See all news stories

In my area

Please enter your details below to find information about your area

Enter house number

Enter postcode

▶ Don't know your postcode?



Do it online

Pay for it	 Council tax	 Parking fine	 Planning fees
	Apply for it		
Report it	 Garden waste recycling	 Business rates	 Invoices

▶ See all online services

Top tasks

- ▶ Bin collections
- ▶ Planning
- ▶ Looking for a home
- ▶ Council tax
- ▶ Leisure facilities
- ▶ Registering to vote
- ▶ Jobs
- ▶ नेपालीमा जानकारी

Contact us

Appendix 4 Main Planning Service Webpage

https://www.rushmoor.gov.uk/planning

Planning - Rushmoor Boro...

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Planning Suggested Sites

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RUSHMOOR BOROUGH COUNCIL

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[Home](#) > [Planning](#)

Planning policy consultations

Have your say on planning policies about affordable housing and community involvement.

[Read more about Planning policy consultations](#)

Planning policy consultations

Recent planning applications

Do I need permission?

Public notice advertising



Do I need planning permission?

Find out if you need planning permission for building work, household projects and larger home extensions.



Planning applications

Find out about, and apply for, planning permission, search and view planning applications and decisions and make appeals.

Planning

In this section, you will find details about planning applications - including how to apply for planning permission and how to find out about applications - and building control.

You can also find out about our planning policies, Farnborough Airport, conservation areas, listed buildings and protected trees.

Appendix 5 Email to Consultees

From: Rushmoor Council Planning Policy Sent: Mon 03/06/2019
To:
Cc:
Subject: Rushmoor Borough Council Planning Policy Consultations

Message  SCI 2019 Statement of availability.pdf (154 KB)  Draft Affordable Housing SPD Statement of Matters and availability.pdf (155 KB)
 Rushmoor Borough Council Planning Policy Privacy Notice.pdf (152 KB)

Dear Sir / Madam,

We are contacting you as you have previously asked to be notified of planning policy consultations undertaken by Rushmoor Borough Council.

Current Planning Policy Consultations

The Council is currently consulting on the following planning policy documents for a period of six weeks:

- Draft Affordable Housing Supplementary Planning Document
- Draft Statement of Community Involvement (2019)

Details of where the documents can be viewed and how to respond can be found in the attached documents. Comments should be received by **5pm on Monday 15 July 2019**.

Future notifications

Following the adoption of the [Rushmoor Local Plan](#) on the 21st February 2019, we are also contacting you to confirm that you still wish to be kept informed of planning policy consultations undertaken by Rushmoor Borough Council. Please find attached our Privacy Notice of how we will use your information.

If you wish to remain on our planning policy consultation mailing list, please respond to this email by 5pm Monday 15 July 2019. If you do not contact us by this date, your details will be removed from our mailing list.

Regards

Planning Policy and Conservation Team
Council Offices
Famborough Road
Famborough
Hampshire
GU14 7JU

Appendix 6 Draft Affordable Housing Supplementary Planning Document – Consultation Responses and Officer Comments

Respondent	Response	Officer Comment
East Hampshire District Council	Thank you for consulting East Hampshire District Council. Officers have assessed the document and have no comments to make.	Comments noted.
Hampshire County Council – Public Health	<p>Truly affordable homes can help to reduce inequalities and support broader health, social and economic benefits. We therefore welcome and strongly support the proposed Affordable Housing SPD. We specifically note and support the following, with our additional recommendations added where relevant:</p> <ul style="list-style-type: none"> • Mix of affordable units – especially the requirement for two-bedroom homes to be able to accommodate up to four people to aid greater flexibility and the requirement for a tenure mix of 70% for social rent and 30% for intermediate products, as we believe that socially rented homes will benefit the most vulnerable in Rushmoor. • Affordability of rented units – we note and support the inclusion of a definition of “affordability” • Procuring a Registered Provider – we note and support the recommendation that developers embark on early engagement with registered social housing providers. We would also welcome a requirement that developers involve social housing providers in the earliest design stages so that innovative options for land use can be explored. A good example of this is Whitehill & Bordon Healthy New Town, where early engagement with the RP (Radian) resulted in the development of a 	<p>Support noted.</p> <p>It is not usually feasible for Registered Providers to be involved in the design stages of a development. However, we would be supportive of such an approach being taken for strategic residential led schemes that will deliver a mix of dwellings.</p>

Respondent	Response	Officer Comment
	<p>community café, operated by the RP, which is run for community benefit and incorporates a range of community uses.</p> <ul style="list-style-type: none"> • Accessible and Adaptable Homes - we note and support the requirements for affordable homes to be built to Building Regulations M4(2) • Internal Space Standards - we support the requirement for homes to be built to nationally described standards. There is good evidence that adequate space benefits health and wellbeing, not least through prevention of overcrowding. • Residential Amenity Space Standards - we support the requirement for affordable homes to meet the same residential amenity standards and those designed for private sale/rent. <p>Other Design considerations - we support the requirement for affordable homes to be built “tenure-blind”. We would like to see the requirement for even dispersal across a site to be strengthened. We also welcome and support the range of requirements outlined in points 3.26, 3.27 and 3.28 of the draft SPD.</p> <p>We question whether the SPD should include reference to existing policy on car parking. We would also like to see requirements for secure, covered cycle parking for all</p>	<p>Even dispersal is not always possible to disperse affordable units within a development and for management reasons such an approach may not be supported by Registered Providers. It is for this reason that the SPD states that ‘it is preferable if affordable units are dispersed throughout the development’.</p> <p>Appendix A of the Councils Car and Cycle parking standards Supplementary Planning Document (2017) sets out the parking standards that apply to residential dwellings. Principle 18 of the SPD states that ‘parking for cycles must be</p>

Respondent	Response	Officer Comment
	affordable homes, especially for flats, to avoid the storage of bicycles in hallways or on balconies.	secure, weather proof and accessible' with paragraphs 8.2 to 8.6 providing further guidance.
Historic England	We have no comments to make on the proposed SPD in historic environment terms. If any specific heritage issues arise as a result of the consultation, please not hesitate to contact us.	Noted
Natural England	Whilst we welcome the opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interest to any significant extent. We therefore do not wish to comment.	Noted
Tetlow King Planning (on behalf of Rentplus UK Ltd)	<p>The recently adopted Local Plan is based on the 2012 NPPF and a SHMA published in 2016. As a result, neither relate to the revised version of the NPPF and specifically the definitions of affordable housing now set out in Annex 2.</p> <p>The Local Plan states that a large proportion of intermediate (subsidised home ownership) housing is met through the private rented sector, but as agreed by PRS cannot truly meet needs due to inherent insecurity and myriad quality issues.</p> <p>The introduction of rent to buy in the national definition of affordable housing brings with it a recognition that many of those families previously assessed as requiring affordable rented housing may also have their needs met through rent to buy.</p>	<p>To ensure consistency with the updated NPPF, paragraph 2.1 (previously 3.1) of the SPD has been amended to state:</p> <p><i>The Local Plan is based on evidence contained in the Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment (SHMA) 2014-2032. Affordable housing should secure 70% for <u>subsidised rent (social rent or affordable rent models)</u> and 30% for intermediate housing (<u>low cost home ownership</u>). As private market rents are high in Rushmoor compared to local incomes, social rents should be offered wherever possible to support low-income households who live and work in the Borough.</i></p>

Respondent	Response	Officer Comment
	<p>We note the text at para 3.6 which seeks affordable rented housing that is genuinely affordable to local people – Rentplus homes are specifically tailored to meet local affordability constraints, working directly with each planning authority to set rent levels that meet local needs.</p> <p>We recommend that the Council seek an additional review of local affordability and how tenures such as rent to buy can help meet the full range of local housing needs.</p>	<p>To ensure greater consistency with the updated NPPF, paragraph 2.5 (previously 3.5) of the SPD has been amended to state:</p> <p><i>The Local Plan and its supporting evidence base identify that greatest need for affordable homes in the Borough is for social rented properties. Therefore, the starting point for a developer is to assume that tenure mix requirements will be 70% for <u>subsidised rent</u> and 30% for intermediate products (e.g. shared ownership). <u>The National Planning Policy Framework (2019) states that where major development involving the provision of housing is proposed, decisions should expect at least 10% of the homes to be available for affordable home ownership¹ as part of the overall affordable housing contribution from the site, unless this would significantly prejudice the ability to meet the identified affordable housing needs of specific groups or where the development is a type that is exempt². However, the exact affordable mix will be dependent upon site-specific circumstances (e.g. site size and location), local needs and viability. <u>All affordable tenures must meet the definitions set</u></u></i></p>

¹ Affordable home ownership includes starter homes, discounted market sale housing, and other affordable routes to home ownership (including shared ownership and shared equity), as set out in Annex 2 of the NPPF.

² NPPF (February 2019), Paragraph 64 provides further detail on the exemptions

Respondent	Response	Officer Comment
	<p>The (Local) Plan is not considered out-of-date simply because it does not reflect the tenures in the revised NPPF, but it is important for this SPD guidance to reflect the widened definition, as demonstrated in a recent appeal decision.</p> <p>We ask that the Council seek to produce a SHMA addendum, considering the extent of needs for affordable rent to buy, and how the SPD can better implement Policy LN2 in the context of the NPPF. The emphasis on meeting local affordable needs for rented accommodation can be met through a combination of social rent, affordable rent and affordable rent to buy, providing clear choice to local people.</p> <p>Text elsewhere in the SPD on 'intermediate' affordable housing should be updated, as the term is now almost obsolete – the NPPF no longer refers to home ownership options in this way, and continued use of the term will cause confusion and uncertainty for developers over the long term.</p>	<p><u>out in Annex 2 of the National Planning Policy Framework (repeated in the Glossary of this document).</u></p> <p>The Local Plan was recently examined and found to be sound by a planning inspector. The plan was subsequently adopted by the Council in February 2019. It is important to note that SPDs can not conflict with the Local Plan.</p> <p>The Council will update its housing evidence base to support a future review of the Local Plan.</p> <p>Changes to paragraphs 2.1 and 2.5 detailed above address this issue.</p>