

Consultation Statement: Affordable Housing Supplementary Planning Document (SPD)

December 2023

Introduction

1. The draft Affordable Housing SPD was published for consultation between 24 July – 18 September 2023. This statement details the consultation on this document before and during the consultation period and the responses received.
2. This statement has been prepared in accordance with regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Background on the draft Affordable Housing SPD

3. The Affordable Housing SPD provides guidance on the provision of affordable housing as a proportion of the total number of new dwellings on appropriate development sites.
4. The SPD is a revision of the Affordable Housing SPD first adopted in 2009 and revised in 2016. It reflects the new Local Plan policies and updates key information. It is a concise document and provides cross references to information where appropriate. Much of the detailed policy context and justification of the approach in the previous SPD has been removed as the approach is now established.

Public consultation on the draft SPD

5. The Council published the Affordable Housing SPD for eight weeks public consultation from between 24 July – 18 September 2023. The consultation period exceeded the six weeks required in the adopted Statement of Community Involvement to take account of the summer holiday period and ensure that everyone had the opportunity to comment.
6. Notification of this consultation was sent to everyone who had signed up to the Council's Local Plan email updates and individuals and organisations on Local Plan consultation database, approximately 3,900 emails and letters. These including statutory consultees, residents and developers.
7. The documents were available online via links on the Council webpage. Paper copies were also available to view at Eastleigh House, other Parish/Town Council Offices and libraries in the borough.
8. The Council encouraged people to respond electronically using the consultation hub; <https://eastleighboroughcouncil.citizenspace.com>. Representations were also accepted via email and by letter.

9. On 13th July 2023, the SPD was discussed at the Council’s Policy and Performance Scrutiny Panel. Internal comments were also made by Planning Enforcement officers.

Responses on the Affordable Housing SPD

Number and type of responses

10. Responses were received from a developer (Bloor Homes) and a Registered Provider of social housing (Abri). In addition, comments were recorded from the Policy and Performance Scrutiny Panel discussion and further internal officer comments were received. Natural England, National Highways and Historic England responded but did not have any comments on the content of the SPD.
11. The table below provides a summary of the issues raised. A response to each comment is included in the Appendix to this statement.

Issues raised

Summary of issue	Council’s response and recommended changes
Clarification required of ‘exceptional circumstances’ and ‘robust justification’ for off-site affordable housing	Exceptional circumstances will be considered on a case-by-case basis. Where they may apply, the Council will work closely with developers to determine this and the justification required. No change required.
SPD should clarify the Council’s approach to First Homes	The policy position on First Homes is to be determined. Proposals will continue to be considered on a case-by-case basis in the interim. No change required.
More flexible approach is required to clustering and further clarification including what constitutes a cluster and the size site this applies to	Guidance on clustering redrafted to clarify approach.
Suggestion that the guidance on the size of small clusters should not include a range, instead it could have a typical size	Range retained as a larger number of affordable flats may be appropriate compared to affordable houses.
Suggestion to reorder guidance to move text on supported housing	This guidance was included in chapter 3 as it covers both the type of provision and its allocation and should be considered at an early stage. No change required.
Applicants should be advised to have early discussions with Registered Providers	Agree. Text added to encourage early discussions with Registered Providers.

Changes to the draft SPD

12. The following changes were made in the final draft version of the SPD:
 - a. Number of applicants on the housing register updated (paragraph 1.4)
 - b. New para added to encourage early engagement with affordable housing providers (new paragraph 3.5)
 - c. Paragraph 3.7 on clustering amended to remove reference to 'on larger sites' and add at the end of the sentence 'having regard to the number of affordable homes, unless otherwise agreed with the Council'

13. The final SPD has been prepared for publication. This version includes a contents page and has been designed to reflect the Local Plan style.

Appendix - Schedule of comments and EBC responses

Number and Type	Comments Summary	Specific Relevant Points/Suggestions	EBC comment	Change req.
Response 1 Bloor Homes	Clarification required of 'exceptional circumstances' and 'robust justification' for off-site affordable housing	<p>Para 2.5 - SPD does not provide any indications or explanation of what would constitute an 'exceptional circumstance' for off-site affordable housing provision and is currently considered to be overly unambiguous.</p> <p>It would be beneficial if this section of the document provided further clarification on what the Council considers to be an 'exceptional circumstance' in order to provide developers with a clear indication of what is required if the option off-site affordable housing needed to be explored. The SPD could also include examples of 'exceptional circumstances' for further clarity.</p> <p>Paras 2.8 and 2.12 - it is recommended that the SPD wording is updated to provide clarification on what is required to be submitted to provide robust justification and to satisfy the Council. For example, would this be in the form of a Viability Assessment prepared and submitted by the developer.</p>	<p>The SPD sets out the strong presumption for on-site provision. If developers cannot meet this requirement, there is some flexibility to accept off-site provision as explained in the SPD. As exceptional cases, these would be dealt with on a case-by-case basis with the Council working closely with developers to consider whether off-site provision would be acceptable and what justification was required.</p> <p>No change required</p>	No
Response 2 Bloor Homes	Support reference to a mix of dwelling type, tenure and size to be assessed on a site-by-site basis	Approach acknowledges that a blanket approach to affordable housing cannot be applied to all housing sites within the Borough as each site is subject to individual circumstances and challenges which may impact the type of affordable housing provision	Welcome support	No
Response 3 Bloor Homes	Support off-site financial contributions	The flexible approach which allows for off-site financial contributions is also supported, subject to the additional clarifications raised.	Welcome support	No

Number and Type	Comments Summary	Specific Relevant Points/Suggestions	EBC comment	Change req.
Response 4 Bloor Homes	SPD should clarify the Council's approach to First Homes	Para 3.2 - In order to provide a clear and consistent approach to affordable housing, the SPD should identify the Council's approach for First Homes.	The policy position on First Homes is to be determined. Proposals will continue to be considered on a case-by-case basis in the interim. No change required.	No
Response 5 Bloor Homes	Support of approach to integrate affordable housing within the provision of private housing	Support approach to integrate affordable housing within the provision of private housing, and this should be indistinguishable from market housing in terms of its visual appearance and its location within the site and should contribute positively to the high-quality urban design of the scheme (para 3.6).	Welcome support	No
Response 6 Bloor Homes	More flexible approach is required to clustering and further clarification including what constitutes a cluster and the size site this applies to	Para 3.6 - It is considered that this clustering requirement should be worded to allow for a more flexible approach to allow for certain development proposals to be reviewed on a site-by-site basis. We suggest the text is amended to state that the clustering approach set in the SPD will be followed by developers, "unless otherwise agreed with the LPA".	Agree. Revised wording on clustering will include text suggested	Yes
Response 7 Bloor Homes	Further clarification required on clusters including what constitutes a cluster and the size site this applies to	Suggest the SPD defines how many dwellings forms a 'larger site' to provide clarification and avoid confusion or misinterpretation of what is classed as a large site in the context of this SPD What comprises an 'affordable housing cluster' should also be defined within the SPD, noting that clustering does not just comprise properties located next to one another, and instead also relates to how the units are provided on site and how they are accessed. This clarification would help reduce confusion and provide additional details which are not found in policy.	Noted. To avoid confusion, reference to larger sites has been removed and final sentence redrafted as follows: 'The affordable housing should be distributed in small clusters of no more than 10-15 dwellings throughout the site ('pepper potting') having regard to the number of affordable homes, unless otherwise agreed with the Council'.	Yes

Number and Type	Comments Summary	Specific Relevant Points/Suggestions	EBC comment	Change req.
Response 8 Policy and Performance Scrutiny Panel	Suggestion that the guidance on the size of small clusters should not include a range, instead it could have a typical size	Para 3.6 – suggest the “affordable housing should be distributed in small clusters of no more than 10-15 dwellings..” should be changed to “small clusters typically not more than 10 dwellings ..” or similar text. This was suggested for clarity to replace the range.	The range was included to cover developments where affordable housing is delivered in flats. In these instances, a larger cluster could be appropriate while the same number of individual houses would not be acceptable. See response to comment 7 for revised wording	Yes
Response 9 Policy and Performance Scrutiny Panel	Suggestion to reorder guidance to move text on supported housing	Para 3.3 - references “supported Housing” as part of the affordable housing provision and highlights that this type of housing may not necessarily be offered through Hampshire Home Choice. This fits better in section 4 about managing and allocating affordable housing.	This guidance covers both the provision of supported housing and its allocation. It was included in chapter 3 under housing mix, type and tenure as it needs to be considered at an early stage when determining the specific type of provision.	No
Response 10 Abri	Applicants should be advised to have early discussions with Registered Providers	In addition to the guidance advising applicants to engage with the Council’s housing enabling team prior to submission of applications it may be helpful to also direct early discussions with Registered Providers such as Abri to ensure a collaborative approach to the design, form and deliverability of new dwellings.	Agree. New paragraph 3.5 added to encourage dialogue with RPs	Yes
Response 11 Abri	Support efforts to boost the supply of affordable housing through effective planning policy	The draft SPD provides appropriate support to the policies of the Local Plan and we support its adoption.	Welcome support	No
Response 12 National Highways	Comment on consulting National Highways	National Highways should be consulted on planning applications for any housing developments which are expected to place significant vehicle trips on the Strategic Road Network	Note comment. No change required	NO

Number and Type	Comments Summary	Specific Relevant Points/Suggestions	EBC comment	Change req.
Response 13 Natural England	Comment on SEA or HRA	<p>No comment as the topic does not appear to relate to Natural England's interests to any significant extent</p> <p>If the SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult Natural England at certain stages as set out in the Planning Practice Guidance</p>	Note comments. No change required	No
Response 14 Historic England	Comment on SEA	<p>No comments to make on the draft SPD</p> <p>We endorse the conclusion that it is not necessary to undertake Strategic Environmental Assessment of this SPD.</p>	Note comments. No change required	No