

East Hampshire Affordable Housing Supplementary Planning Document (SPD)

Consultation Statement

1. Introduction

1.1 Under Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 it is a requirement to prepare and make available a Consultation Statement setting out:

- The persons the local planning authority consulted when preparing the supplementary planning document,
- A summary of the main issues raised by those persons, and
- How those issues have been addressed in the supplementary planning document.

2. Persons consulted when preparing the SPD

2.1 The Affordable Housing SPD was subject to public consultation for a period of 4 weeks between Monday 31 March to Monday 28 April 2025.

2.2 Copies of the draft document and supporting information; a Strategic Environmental Assessment and Habitats Regulations Assessment Screening and Equalities Impact Assessment (Appendix 1), were made available to view at the following locations during opening hours:

- East Hampshire District Council Offices (Monterey House, Petersfield)
- Horndean Parish Office
- Alton Library
- Bordon Library
- Liphook Library
- Petersfield Library

2.3 The SPD and supporting information were also made available to view online at:

- <https://www.easthants.gov.uk/planning-services/planning-policy/local-plan/emerging-local-plan/current-planning-consultations> (see Appendix 2).

- 2.4 Representations were invited via email or post. No representations were made by post. All email representations received an automatic reply and then were individually acknowledged once the consultation had closed.

3. Promotion of the consultation

- 3.1 The consultation started on Monday 31 March 2025. On that day, a news release was sent from the Council to all those who had registered an interest in the Local Plan or planning. This totalled 6500 people. It was also sent to all East Hampshire District Councillors and relevant MPs.
- 3.2 An email notification was also sent to all statutory consultees. This includes Parish and Town Council clerks, Neighbouring Councils, Neighbouring Parish Councils. In addition, general consultees were also notified. Given the subject matter, all known housing associations operating in the local area were notified.
- 3.3 The news release was also posted to the home page of the website as 'latest East Hampshire news' - <https://www.easthants.gov.uk/news/2025/east-hampshire-district-council-launches-consultation-draft-affordable-housing-spd>.
- 3.4 The deposit locations (para 2.1) including libraries received a letter and consultation material advising of the consultation and asking them to make the material available.

Figure 1 News Release (Monday 31 March 2025)



East Hampshire District Council launches consultation on Draft Affordable Housing SPD

East Hampshire District Council is taking an important step to addressing the district's need for affordable homes by releasing a draft Affordable Housing Supplementary Planning Document (SPD) for public consultation.

This initiative aims to ensure the affordable housing delivered in East Hampshire meets the specific needs of local communities.

Take part in the consultation

Cllr Angela Glass, EHDC's Portfolio Holder for Planning, said: "As one of Hampshire's most unaffordable areas, East Hampshire faces significant challenges in providing affordable housing.

"Following the government's introduction of a mandatory housing target of 1,142 homes per year, the draft SPD clarifies existing requirements for affordable housing, helping developers and stakeholders better align with the district's priorities."

The SPD does not introduce new policies but provides guidance for implementing existing ones. It applies to the area within East Hampshire outside of the South Downs National Park.

The draft SPD is available for consultation from **Monday, 31 March, to the end of Monday, 28 April 2025.**

Supporting documents, including a Draft Affordable Housing SPD, an Equality Impact Assessment and a Strategic Environmental Assessment and Habitats Regulations Assessment Screening Statement.

Strategic Environmental Assessment, a Habitats Regulations Assessment, Screening Statement and an Equality Impact Assessment, are also available for review.

Documents can be viewed online or in person at local libraries (Petersfield, Alton, Liphook, and Bordon), Horndean Parish Council office, and East Hampshire District Council's offices by appointment.

Figure 2 Webpage

Current planning consultations

Have your say in consultations related to the local plan or have a look at our previous consultations.

[Home](#) » [Planning services](#) » [Planning policy](#) » [Local plan](#) » [Emerging local plan](#)

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East Hampshire District Council draft affordable housing supplementary planning document (SPD) consultation

Background

East Hampshire is one of the most expensive places to live in Hampshire, and many people struggle to afford housing. To help address this, the Government has set a target for 1,142 new homes per year in the district.

As more planning applications for new homes come in, the affordable housing supplementary planning document (SPD) will provide clear guidelines on affordable housing requirements.

This SPD does not create new policies but helps clarify existing ones.

Have your say

We are inviting the public to share their thoughts on the draft affordable housing SPD.

- [Draft affordable housing SPD](#) (pdf 243 kb)

The consultation period runs for four weeks, from Monday, 31 March to Monday, 28 April 2025.

The draft SPD is supported by:

- [Equalities impact assessment - affordable housing SPD](#) (pdf 235 kb)
- [Strategic environmental assessment and habitats regulations assessment screening statement](#) (pdf 161 kb)

Where to view the documents

You can access the draft SPD and supporting documents online or view them in person at:

- Local libraries in Petersfield, Alton, Liphook, and Bordon (details of library opening times can be found on [Hampshire County Council](#) website)
- Horndean Parish Council Office.
- East Hampshire District Council Office (Monterey House, Petersfield) – by appointment only.

To book an appointment, please email localplan@easthants.gov.uk or call 01730 234339.

How to make a representation

All comments should be sent to localplan@easthants.gov.uk

If you are unable to submit your comments electronically please post your written comments to the Planning Policy Team, EHDC, PO Box 310, Petersfield, GU32 9HN, to arrive by the close of the consultation period (end of 28 April 2025).

Anyone can make a request to be notified of when the SPD is adopted in their representation.

All representations made during the consultation must be made in writing.

Anonymous representations will not be accepted.

Copies of comments received during the consultation, or a summary of them, will be made available to view on the council's website. Comments therefore cannot be treated as confidential. Personal details will be redacted prior to publishing.

Data will be processed and held in accordance with the planning policy [service privacy notice](#).

Next steps

Following consultation, the council will collate all responses and publish on the council's website in summary form in a statement of consultation.

The council will consider any issues raised and whether any final changes to the SPD are necessary.

Once this is completed, the council will be seeking to adopt the SPD.

Previous planning consultations

Previous consultation documents that have formed part of the preparation of the emerging local plan.

[Previous local plan consultation documents](#)

4. Summary of the main issues raised by those persons

- 4.1 A total of 17 individuals and organisations responded to the consultation.
- 4.2 The comments made are summarised in Section 5 Table 2.
- 4.3 6 statutory consultation bodies responded to the consultation and 4 of these did not request any changes to be made to the Draft SPD. These are;
- Natural England
 - National Highways
 - Historic England
 - Whitehill Town Council
- 4.4 Comments were received from South East Water and Hampshire County Council (HCC) Public Health (2 statutory consultees) recommending amendments.
- 4.5 The remaining statutory consultation bodies, general consultation bodies and individuals submitted comments requesting changes to the documents. The key response themes can be summarised as:

Table 1 Key Response Themes

Thresholds for provision
Affordability ratios
How 'affordable' is affordable housing
The appropriateness of flats as affordable housing, and the number of affordable flats within a development
The role of an SPD and its inability to introduce new policy
The link between housing and health

5. How the comments and issues raised have been addressed in the SPD

- 5.1 The Officer comments relating to these comments and how they have been addressed in the final version of the SPD can be found in Table 2.

Table 2 Summary of issues raised and how addressed in the SPD

ID	Respondent	Response Summary	EHDC Officer Response
1	Natural England	No further comment (to that received in relation to the Strategic Environmental Assessment and Habitats Regulations Assessment Screening).	Noted.
2	National Highways	No comment.	Noted.
3	Historic England	No comment.	Noted.
4	Grayshott & District Housing Association	<p>Grayshott & District Housing Association is a charity and not a Registered Provider, so is unable to access Government housing finance for either new builds or retrofitting. Yet, EHDC criteria also prevents us accessing EHDC funds as we are a Housing Association.</p> <p>One change that would assist us in further small scale development is to allow community led HA's access to local CIL and S106 funding. Currently we are limited in the developments we can provide by the amount we can borrow on the open market using rental income to repay any loans. Nationally there is a growth in support for the smaller community led housing organisations such as Grayshott & District Housing Association, but we need funding to meet local needs.</p>	<p>CIL regulations state that we cannot use Strategic CIL towards the provision of affordable housing and this is reiterated in the Government's CIL guidance. Neighbourhood CIL can be used to provide Affordable Housing.</p> <p>The Council updated its procedure for allocating Affordable Housing Developers Contributions in May 2017. The revised list of eligible providers includes the following;</p> <ul style="list-style-type: none"> • Registered Providers • Non- Registered Providers • Housing Associations • Registered Charities • Housing Companies • Housing Trusts • Community Land Trusts • Affordable housing arm of private developers • Private companies specialising in sub-market intermediate tenures • Local Authorities

			<ul style="list-style-type: none"> Other provider of affordable housing not listed but approved by the Council as a suitable provider of affordable housing. <p>Therefore, Affordable Housing Developer Contributions could be made available to a host of organisations, however, EHDC would review each request for grant on a case-by-case basis.</p> <p><i>Change: A definition for 'Affordable Housing Providers' has been added to the Glossary.</i></p>
5	Hamble Property	Welcome clarification on self build, that where meeting thresholds, affordable housing requirements apply.	Support noted.
6		Concern about parcelling up land into smaller parcels to avoid affordable housing requirements.	<p>The Council shares this concern, and this can be dealt with through planning policy. This was not required in the Joint Core Strategy as JCS Policy CP13 required affordable housing to be provided on sites of 1 home or more, so parcelling up land to avoid provision was not considered an issue. However, since then the thresholds were increased through National Planning Policy Framework (NPPF) by the Government.</p> <p>Given that change, the Draft Local Plan 2024 Policy H3 Affordable Housing included the text "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."</p> <p>New policy can only be implemented through the Development Plan, and not the SPD. As such, no change, but noted in terms of the emerging Local Plan.</p>

7		<p>Propose imposing affordable housing contributions on any self build dwelling above a certain size. This could align with the new Class Q PDR rules limiting the size of new countryside dwellings to 150sqm.</p>	<p>The SPD makes clear that self build is not exempt from the provision of affordable housing.</p> <p>“Proposals for self and custom build homes are not exempt from the provision of affordable housing, and the content of this note applies to such proposals. For example, a proposal for two self-build homes on a site of 0.5ha would trigger a requirement for affordable housing.”</p> <p>Appreciate the respondent is making the point that rather than site size (as this may be encouraging ‘parcelling’ into smaller plots), the threshold for self-build should be number of homes, and this could be reduced. However, the NPPF is clear on the thresholds, and this cannot be changed through the SPD. Equally, when a new Local Plan is in place, there should be policy to deal with ‘avoidance’ of provision through parcelling of land.</p> <p>Also, see para 4.4 of the SPD re application for rural designation for 17 parishes in East Hampshire, which would likely impact on small self build plots in rural areas, if introduced.</p>
8		<p>Consider applying CIL contributions to replacement dwellings which increase the floor area by more than 100sqm of the previous dwelling. Amateur developers seek the permission and then sell it on as a self build plot. This isn’t in the spirit of the self build rules.</p>	<p>CIL is collected on replacement dwellings with any increase in floor area, in line with the CIL regulations.</p> <p>Comment noted, but outside of Council control, as there is nothing in the regulations that would alleviate this issue should it arise.</p>

9		Propose requiring self build in the countryside (outside settlement boundaries) to be limited to those with a genuine local connection - living or working in the immediate area rather than East Hants.	<p>The Self Build regulations do allow Councils to introduce Local eligibility conditions, including a local connection test¹. Due process would need to be followed to introduce such a test. At present, the Council does not operate additional eligibility conditions, but it does ensure that those that are entered onto the register meet the basic conditions (by requiring proof)².</p> <p>At present there are 26 people on the Self Build register (as at 1 May 2025).</p> <p>We note the respondents concern about the use of self-build and their recommendation that local connection test is introduced. This is a separate matter to the SPD. However, the issue is that eligibility onto the register, even if restricted, does not prevent applicants seeking permission for self-build and themselves occupying the property. A person does not need to be on the register to apply for permission and CIL exemption for self build.</p>
10	Individual (KR)	The target of 40% is too low for new housing developments - raise it to 50%. Propose offering incentives to those who provide more.	<p>The current threshold as set out in the Joint Core Strategy was viability tested at the time.</p> <p>Appreciate the respondent would like to see more affordable housing delivered, and as such, an increase in the proportion of affordable housing required on new developments. This will be considered through viability testing of the new Local Plan. A balance must be struck between seeking maximum benefits from development, and what can viably be delivered. Equally, the SPD is not the appropriate planning mechanism to make such a change. Any change to threshold is introducing new policy which needs to be considered through the Local Plan.</p>

¹ <https://www.legislation.gov.uk/uksi/2016/950/regulation/5/made>

² <https://www.easthants.gov.uk/planning-services/planning-policy/self-and-custom-build-register>

11		Increase taxes / ask people to be more philanthropic.	Comments noted. This is outside of the control of the local planning authority.
12		The SDNP is not a reason to build less homes, there is plenty of land in East Hampshire.	Comments noted. These general comments relate to the preparation of the Local Plan, rather than the specifics of this SPD.
13	Individual (KS)	Building more homes will not reduce the price of houses. The emphasis should therefore be entirely on providing affordable homes for rent.	<p>Comments noted. The Government is clear in its objective to significantly boost the supply of homes, with a mix of type and tenures of homes. The NPPF says, "The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community." (para. 61).</p> <p>The Housing and Economic Development Needs Assessment (HEDNA) which is evidence base for the Local Plan shows a need for a range of types and tenures of new homes. It would not be sound for a Local Plan to propose entire provision of new homes to be affordable homes for rent.</p>
14		Affordable homes must be provided where there are other services e.g. public transport, therefore all new homes should be provided in existing towns.	<p>The Government is clear in its objective to significantly boost the supply of homes³. To this end, it has significantly increased and made mandatory the housing number for East Hampshire. The location of new homes will be considered through the new Local Plan, of which sustainability/accessibility will be a consideration.</p> <p>However, with such a high housing number the Council is not able to restrict the location of new homes to within existing towns.</p> <p>The location of new homes is a consideration for the Local Plan and not this SPD, as such, no change to the SPD is made.</p>

³ The Government has set a target to build 1.5 million new homes over the next five years to address the housing crisis, with a focus on affordable housing and new towns. This target translates to an average of 300,000 net new homes each year.

15		There should be no rural exception sites.	<p>Rural exception sites are supported by National Planning Policy Framework, and as such a policy in a Local Plan that does not allow such proposals would not be considered sound by an inspector at examination.</p> <p>The NPPF says, “Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this” (para.82).</p> <p>Policy proposals are a consideration for the Local Plan and not this SPD, as such no change.</p>
16	South East Water	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><i>Change: Additional text added to the SPD, at para 5.4 to say, “In addition, properties should be as water efficient as possible, particularly with regards to new affordable homes as customers may need support in keeping their bills as low as possible.”</i></p> <p>Note, the Draft Local Plan 2024 contained specific policies on Water Quality, Supply and Efficiency (Policy NBE8).</p>
17		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	Comments noted. This relates to the preparation of the Local Plan.

		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.	
18	Briarsgate Homes	<p>The SPD assumes that small developments can absorb significant policy contributions through commuted sums or on-site delivery. However, there are many viability pressures on small sites, and large upfront costs that carry higher risks for small sites. Without recognising this, the SPD risks discouraging small site delivery.</p> <p>The SPD acknowledges the value of SMEs but does nothing specific to assist them.</p>	Comments noted and addressed. <i>Change: see paras 4.29, 4.30 and 6.6.</i>
19		The use of a 0.5-hectare site area threshold, particularly in rural settlements, is significantly counterproductive for high-quality, context-sensitive design. Urge the Council to consider a more flexible approach that reflects density and character rather than raw site area. A policy that inadvertently discourages good design must be revised.	<p><i>Comments noted and addressed.</i></p> <p><i>Change: see para 6.6 which assist SMEs with payment triggers, and para 4.12 re design.</i></p>

		<p>Therefore recommend:</p> <ul style="list-style-type: none"> • Revisiting the site area threshold in rural contexts, potentially linking it to net density rather than gross area • Introducing a viability buffer or sliding-scale contribution approach for schemes under 10 units • Allowing flexibility in the timing of commuted sum payments (e.g. post-occupation). • Recognising high-quality, design-led development — particularly by local SMEs — as a material planning consideration 	
20		<p>Registered Providers (RPs) are often unwilling to take on small numbers of units — typically fewer than 5 or 6 — due to operational inefficiencies. This disconnect between policy and practice creates a delivery vacuum.</p> <p>This issue is especially acute for SME developers, who are most likely to be delivering smaller, high-quality schemes. It also risks the Council failing to meet its own affordable housing targets, not through developer unwillingness, but due to the lack of suitable delivery partners.</p> <p>We suggest the SPD explicitly acknowledge this constraint and provide greater flexibility or alternative</p>	<p>The Council recognises this issue and considers that it is pragmatic when it comes to looking at alternative ways of meeting an affordable housing obligation if there is no RP interest.</p> <p>Comment noted and addressed. <i>Change: See paras 4.30 and 4.31.</i></p>

		<p>mechanisms to facilitate delivery in these cases.</p> <p>Recommend</p> <ul style="list-style-type: none"> Exploring alternative delivery routes where small unit numbers make RP involvement unviable (e.g. council-led off-site delivery, pooled funds, or intermediate tenure products). 	
21	Stand with Medstead Against Speculative Housing (SMASH)	<p>Since 2016, 213 affordable homes have been approved (of which 129 have been built so far) in 'South Medstead'. Policies CP13 and CP14 refer to local need for affordable housing. There are 42 people/families on the Hampshire Home Choice Register in Medstead (as of March 2025).</p> <p>As the 'local need' is based on people with a local connection i.e. live, work or have family in the location, then this means that there is currently no need for more local affordable houses to be planned in Medstead. Medstead is not a suitable location to meet wider needs for affordable housing.</p>	<p>Para 2.2 of the AH SPD gives the policy position regarding need and details the evidence base as the HEDNA 2022. The key point being: "the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise". CP11 is the supporting policy.</p> <p>Hampshire Home Choice (HHC) provides a useful snapshot of need but has its limitations as a reliable tool for assessing 'local need'. The total housing need for rented accommodation usually stays at a figure of c.1600 households, which is the number of applications registered with HHC. HHC does not provide housing needs data for intermediate forms of housing such as shared ownership/equity and so cannot be solely relied upon as a measure of 'local need'.</p> <p>Development sites brought forward under CP13 will provide affordable housing that contributes towards meeting the total housing need for East Hampshire. The Council will prioritise housing applicants with a 'local housing connection' to the parish where the development site is situated but will not exclude other HHC applicants without a 'local housing connection'. This mechanism of prioritising allocations forms part of the affordable housing schedule within the Council's standard S106 agreement accompanying all development sites with an element of</p>

			<p>affordable housing.</p> <p>CP14 specifically targets small scale affordable housing delivery to address, unmet, local need. Development is only permitted where this 'local need' can be evidenced. HHC may be used as part of the evidence base for CP14 sites, but other data sources obtained from: Housing needs surveys, telephone surveys, local advertising, HHC mailshots and other public records, will also be used to substantiate the 'local need'.</p>
22		Rural exception site policy has never been applied to large sites outside of the SPB in Medstead – question why this is the case.	<p>The NPPF defines 'Rural exception sites' as <i>“Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.”</i></p> <p>The Council cannot apply rural exception policy if the proposal is not for a rural exception site. Note the definition is 'small sites'.</p>
23		It is not clear what should happen if planning approval has already been given and then the developer wishes to reduce their agreed affordable housing commitment. This scenario has occurred multiple times around the country and therefore should be further clarified in the SPD.	<p>If the applicant requests to change any agreed affordable housing scheme, we will request they provide a viability appraisal that outlines why the section 106 cannot be provided. The Council will then independently get this reviewed at the developer's expense. Following on from the viability review, the Council may agree to vary the affordable housing scheme via a formal deed of variation.</p> <p><i>Comments noted and addressed: Changes at paras 4.28 – 4.31 re viability.</i></p>

24	Hampshire County Council (HCC) Public Health	Support the aims of the SPD. A secure and stable home is a key building block of health and essential for our health and wellbeing, regardless of whether residents own their home or live in social rented or private rented accommodation.	Support noted.
25		<p>The SPD should make a clear reference to Section 8 of the NPPF 'Promoting Healthy and Safe Communities'.</p> <p>Also recommend including references to the Joint Strategic Needs Assessment (JSNA) Joint Strategic Needs Assessment (JSNA) and the HCC Public Health Strategy within this section of the SPD.</p>	<p><i>Comments noted and addressed.</i></p> <p><i>Change: Additional paragraph added at 3.8.</i></p>
26		In Table 2 the definition of inclusion needs revision. Ideally all homes should have adaptable and inclusive design approaches for numerous changing lifetime circumstances and inclusion is not solely about the need for specialist forms of housing.	This part of the Affordable Housing Strategy is to show how we can help different types of people that require affordable housing within the district. The inclusion heading shows what work has been done to help those facing homelessness, but also how we can help those with aspirations of getting on the housing ladder through our shared equity model. Further detail on adaptable housing or specialist housing will be addressed as part of the Local Plan review.
27		Support the Town and Country Planning Association's (TCPA) Healthy Homes Principles for building new homes Healthy Homes Principles - Town and Country Planning Association (tcpa.org.uk) and would recommend that where possible the 11 principles are considered where appropriate.	Comments noted. These comments more generally relate to the preparation of the Local Plan, rather than the specifics of this SPD.

28		<p>Recommend that the following are considered:</p> <ul style="list-style-type: none"> • The wider environment (the street and neighbourhood) • Active travel • Access to public green space • Policies for provision of a range of play spaces for children of all ages and younger adults • Local Transport Plan 4 	<p>Comments noted – these are wider considerations than this SPD and delving into listing all other relevant planning policies and material planning considerations.</p>
29		<p>The SPD would benefit from mandating a minimum % of all affordable homes which must be accessible and adaptable.</p>	<p>The introduction of new policy is not possible through an SPD.</p> <p>This is considered in the Draft Local Plan, Policy H2 Housing Mix and Type which says, “Subject to site suitability, affordable dwellings should be built to accessible and adaptable standards to meet the requirements of Building Regulations M4(2), and, where evidenced by local need, a proportion of affordable dwellings to be built as wheelchair user dwellings to meet the requirements of Building Regulations M4(3).”</p>
30		<p>Recommend the SPD could usefully seek the inclusion of the HAPPI guidance in provision of specialist housing (Section 4.25 and 4.26). This outlines best practice design approaches in relation to the layout, design and built form of housing for an ageing population.</p>	<p>HAPPI stands for Housing our Ageing Population: Panel for Innovation. It's a panel of experts that developed a set of design principles and guidelines for housing older people. These principles aim to create homes that are attractive, adaptable, and meet the needs of aging individuals while also considering wider community integration.</p> <p>Comments noted. These comments more generally relate to the preparation of the Local Plan, rather than the specifics of this SPD.</p>

31	Individual (AB)	'Affordable housing' is not 'truly affordable' and unless the Council reduces the affordability ratio, all housing will be unaffordable for the average person.	<p>Comment noted. The Council must work to the National Planning Policy Framework, which provides a definition for planning purposes of 'affordable housing'.</p> <p>The Council has proposed text within this SPD to try and deliver more social rented housing. Although we cannot change existing policy, this is our aspiration, and it will support those on lower incomes secure a truly affordable rented home.</p> <p>The Council has also delivered a variety of innovative affordable housing schemes that are set out within the Council's Affordable Housing Strategy. A number of intermediate housing products have been delivered to help meet the needs of the district. Some of these include, Rent to Buy, Shared Ownership and Shared Equity. A Shared Equity model with Merlion Homes that includes investment from EHDC has been successful to date, enabling purchasers to get onto the housing ladder with discounts of up to 50% on the market value.</p>
32	Individual (AB), Individual (NS) & CPRE	The proportion of social housing should be increased.	The Local Plan and viability testing would be the mechanism to consider this and determine what level of social housing is appropriate.
33	Individual (AB), Individual (NS) & CPRE	Many types of tenure of affordable homes are not affordable to those on mid and lower incomes. Propose adopting a definition of affordability related to people's incomes and personal circumstances, rather than market prices and set clear empirical parameters based on what people earn as the main definition as to what is affordable.	<p>The Council must work to the National Planning Policy Framework, which provides a definition for planning purposes of 'affordable housing'.</p> <p>The Council delivers a broad range of affordable housing tenures. We cap affordable rents at the local housing allowance rates to help with affordability and have included a preference for 25% social rented housing within this SPD. There are also a variety of intermediate tenure options available for those looking to get on the housing ladder. Some of these include, Shared Ownership, Rent to Buy, Discount Market Sale and Shared Equity.</p>

			The Government has set a household income cap of £80,000 which excludes those on a high income to purchase affordable housing. Changes to the shared ownership model in the Affordable Homes Programme 2021-2026 allows purchasers to buy a property at an initial share of just 10% (down from 25%) to help with affordability and raising a deposit.
34	Individual (AB), Individual (NS), & CPRE	The median house price of all new builds should be below the median house price of the existing housing stock. This should be written into policy and would encourage the market to build more genuinely affordable homes.	Prices are determined by the market. The Council is unable to change this. Developers need to be able to provide current market sale homes to deliver the various planning obligations.
35	Individual (AB), Individual (NS) & CPRE	The SPD says that the Council is unlikely to support entire provision of affordable housing as flats. To address the affordability crisis, the market should be encouraged to build flats as they represent an affordable opportunity to get on the housing ladder. Flats should be considered a central part of the affordability policy.	<p>Flats can be supported; however, the aim of this guidance is to discourage developers proposing large, 3,4- and 5-bedroom houses as market sale units and then offering the affordable housing provision up as 1- and 2-bedroom flats. The market sale mix must not be disproportionate to the affordable mix.</p> <p>All applications will be reviewed on site-by-site basis and in some instances a larger number of flats may be acceptable. This could be when the site falls within a town centre location or when the entire market and affordable housing mix is proposed as flats. In general, there is a much greater need for those on Hampshire Home Choice for 2-bedroom houses and feedback from Affordable Housing Providers have advised of slower sales for flats, so we need to be mindful of providing a fair balance of homes across all tenures.</p> <p><i>Comments noted and addressed.</i> <i>Change: See para 4.13.</i></p>

36	Individual (AB), Individual (NS) & CPRE	There is a major challenge of affordability in rural areas. There should be more specific, empirical targets for rural dwellings especially for key workers.	<p>The draft SPD says,</p> <p>“With regards to NPPF para 65, there are currently no designated rural areas in East Hampshire outside the SDNP where a lower threshold exists. However, note</p> <ul style="list-style-type: none"> • The latest progress of proposals to include parts of East Hampshire within a National Landscape (formerly referred to as an Area of Outstanding Natural Beauty (AONB)) by Natural England which could change this, and • An application has been made by the Council to the Secretary of State (December 2024) to have 17 Parishes in East Hampshire designated as rural areas.” <p>The Council was advised it could take up to 12 months to receive an outcome of the application to the Secretary of State. In March 2025, the Ministry confirmed our application was still at assessment stage. If successful, this gives the Council options to reduce the threshold for provision.</p> <p>This means in the future we may be able to seek affordable housing on small sites in rural areas, that currently don't meet the thresholds.</p>
37	Abri	The stated maximum number of flats at paragraph 4.13 is unusual, providing no flexibility as in the remainder of the section to respond to local context and site specific conditions. This figure does not reflect our management practices and may unnecessarily restrict new development that could deliver a high standard of living with a greater number of, for example, social rented flats in one block. We	<p><i>Comments noted and addressed.</i></p> <p><i>Change: See para 4.13.</i></p>

		suggest that this sentence is omitted from the final version of the guidance.	
38		<p>The expressed preference at paragraph 5.7 for 25% of the affordable housing for rent mix to be delivered as social rent is set out in the emerging local plan policy, but not yet established. Until such time as it is adopted this guidance has not been subject to viability testing and should not be included. The indication in the NPPF (December 2024) is clear that any minimum proportion of social rent should be set in planning policy, and this remains the correct route for introducing this in advance of any national policy on tenure split. The indication of a preference can otherwise too readily be interpreted as a requirement, which the ‘failure’ to achieve in an application can encourage an application to be adversely determined.</p>	<p>The first sentence of para 5.7 says,</p> <p><i>“Generally, as preference, the Council will likely seek 70% of the affordable housing provision as affordable housing for rent (as defined by the NPPF 2024), and 30% as other affordable home ownership products to be agreed. This is what has generally been delivered to date and is likely to be taken forward in the emerging Local Plan (subject to viability testing).”</i></p> <p>It is not considered that ‘generally, as preference’ and ‘will likely’ is setting new policy, or setting out a definite position. It is saying this is generally what we prefer, this is generally what has happened, it is probably what we will initially request – but that is not in all cases, or an absolute requirement. It is not considered that this paragraph sets new policy.</p> <p>It remains a preference for the Council to support a range of affordable housing tenures, including social rent.</p>
39		<p>Whilst Abri supports the use of the NDSS as an effective tool to drive up better housing standards, as this is not yet a policy requirement the wording in the draft SPD is too forceful, essentially introducing policy, contrary to national guidance. It would be more helpful at this stage, prior to the introduction of NDSS in the new local plan, for the guidance to express support for applications that seek to deliver homes designed to meet the space standards.</p>	<p>Policy CP13 states, <i>“New residential development will be required to: b) provide a range of affordable housing types and sizes.” “The type and size of dwellings, in terms of bedroom numbers, habitable rooms or floorspace will be determined on a site-by-site basis using the most appropriate basis that helps deliver the type and size of affordable units needed, as identified by the Council.”</i></p> <p>The AH SPD does not introduce new policy with regards to NDSS, but provides clarity that ‘the appropriate basis’, for determining unit size, should be NDSS.</p>

			<p>The Homes England Capital Funding Guide for the AHP 2021-2026 states that 'all new homes should aim to meet NDSS'. The Capital Funding Guide (CFG) then provides an allowance of within 15% of NDSS.</p> <p><i>Change: See track changes in paras 5.9-5.11, which includes para 5.10 which says, "Affordable homes should aim meet the Nationally Described Space Standards".</i></p> <p>This aligns the SPD with the CFG, whilst improving space standards, with CP13 clearly giving the flexibility for the Council to apply a lower space standard if site specific circumstances require it.</p>
40	Whitehill Town Council	No comment.	Noted.
41	Medstead and Four Marks Neighbourhood Plan Steering Group	<p>NPPF Paragraph 65 provides EHDC the leeway to provide Affordable Housing 'in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)'.</p> <p>EHDC should implement this guidance and the SPD be updated to require the minimum size of site to provide Affordable Housing to be reduced from 10 dwellings to 5 dwellings or above.</p>	<p>This is being pursued. The draft SPD says,</p> <p>"With regards to NPPF para 65, there are currently no designated rural areas in East Hampshire outside the SDNP where a lower threshold exists. However, note</p> <ul style="list-style-type: none"> • The latest progress of proposals to include parts of East Hampshire within a National Landscape (formerly referred to as an Area of Outstanding Natural Beauty (AONB)) by Natural England which could change this, and • An application has been made by the Council to the Secretary of State (December 2024) to have 17 Parishes in East Hampshire designated as rural areas." <p>The Council was advised it could take up to 12 months to receive an outcome of the application. In March 2025, the Ministry confirmed our application was still at assessment stage. If</p>

			successful, this gives the Council options to reduce the threshold for provision.
		Proposed EHDC takes the strategic decision to lower the minimum site size, to combat the exceptionally high Affordability Ratio across the District.	The SPD is not the appropriate planning mechanism to make such a change. Any change to threshold is introducing new policy which needs to be considered through the Local Plan.