

KEY DECISION? NO

REPORT NO. PG2531

**AFFORDABLE HOUSING
SUPPLEMENTARY PLANNING DOCUMENT
UPDATE 2025**

SUMMARY:

The Affordable Housing Supplementary Planning Document is a subsidiary document to the Local Plan. It provides additional information to developers on the implementation of the Local Plan policies related to the delivery of new affordable homes,

The Current SPD was adopted in 2019. Since then, changes to the National Planning Policy Framework, Building Regulations, Government Housing Priorities and increases to rents and benefits have meant that an update is required. This report sets out the key areas of the existing document to be updated.

RECOMMENDATIONS:

From the information in this report Cabinet is asked to agree:

- To consult on the revised Affordable Housing Supplementary Planning Document and thereafter delegate authority to the Executive Head of Property and Growth, in consultation with the Portfolio Holder, to make any necessary final amendments that are not substantive in light of the consultee comments before final adoption.

1. INTRODUCTION

The Affordable Housing Supplementary Planning Document (The SPD) is subsidiary to the main Local Plan document. Its purpose is to provide additional advice to private developers and Registered Providers on the delivery of new homes in the borough, usually brought forward as part of section 106 obligations. The SPD cannot change the policy in the adopted Local Plan, its purpose is to provide additional guidance on its implementation.

2. BACKGROUND

2.1 What is included in the Affordable Housing SPD

The SPD provides a consistent set of advice, this includes:

- The tenure types and sizes which is based on housing need.
- How to support balanced neighbourhoods through the location or groupings of different tenures within a wider development.
- Securing a Registered Provider to manage the Affordable Homes
- A transparent process of calculating an off-site contribution (commuted sum) where it is not possible to deliver the affordable homes on site.

2.2 Why the Affordable Housing SPD needs updating

The current SPD was adopted in 2019. Since then, there have been changes to the National Planning Policy Framework and Building Control Regulations and significant increases in local market rents and the Local Housing Allowance (the housing element of universal credit payments), all of which need to be up to date to provide developers with the best advice.

3. DETAILS OF THE PROPOSAL

3.1 General

The key areas which are to be updated are:

- 1) Inclusion of the council's key priorities to demonstrate how the Affordable Housing SPD assists the council in meeting these, especially Homes for All: Quality Living, Affordable Housing
- 2) Updated references to the National Planning Policy Framework, particularly the priority now being given to social rent over other affordable housing for rent.
- 3) Reference to the councils Housing and Homelessness Prevention Strategy 2023-2027.
- 4) Change to the council's rent setting framework- The current SPD includes a rent cap included of £250 per week for a four-bed property which is now proposed to be removed.

Affordable Rents are set at up to 80% of Open Market rents nationally. Due to the high rent levels in the borough (compared with other parts of

the country), the council adopted a rent setting framework to maximise affordability for tenants. The adopted rent setting framework seeks to secure rents levels as follows:

- One- and two-bedroom properties at 70% of the open market rent, or the Local Housing Allowance, whichever is the lower.
- Three- and four-bedroom properties at 65% of open market rents, or the Local Housing Allowance, whichever is the lower.

All LHA rates can be viewed here: [Local Housing Allowance \(LHA\) for private tenants - Rushmoor Borough Council](#)

The cap of £250 for a four bed is now significantly below the current market rent and Local Housing Allowance of £392.23 per week. It is not necessary to set a new cap, which would need to be updated regularly, as applying the lower of the size related percentage or the Local Housing Allowance is working to secure affordable housing on current schemes.

To assist members in seeing how the changes impact the existing document, a tracked changes document has been produced and attached as an appendix 1 to this report.

Consultation

Project officers have consulted internally within the Housing and Property and Growth Services. Members of the Strategic Housing Local Plan Group were consulted on 9th September 2025. Should the Cabinet agree the recommendation of this report, a 6-week public consultation on the revised SPD will be undertaken in line with the Council's Statement of Community Involvement.

4. IMPLICATIONS

4.1 Risks

Making use of an out-of-date SPD is a reputational risk which could jeopardise the delivery of affordable homes in the borough.

4.2 Legal Implications

There are no specific legal implications relating to the content of this report. There are however risks if the work is not carried out, therefore the consultation is a necessary piece of work to move the SPD forward and ultimately mitigate the

risks. *Amanda Bancroft Interim Monitoring Officer & Corporate Manager Legal Services* 25/09/2025 25/09/2025

4.3 Financial and Resource Implications

There are no direct financial or resource implications from this proposal.
Peter Vickers S151 25/9/2025

4.4 Equalities Impact Implications

An Equalities Impact Assessment has been completed; see appendix 2.

5 CONCLUSIONS

The council's published Affordable Housing SPD requires updating to ensure that developers are provided with the most up to date advice on implementing Local Plan Policy. There are no significant risks or resourcing implications associated with the update

BACKGROUND DOCUMENTS:

Rushmoor Borough Council Delivery Plan 2025-2026
Rushmoor Borough Council Local Plan 2014-2034
Rushmoor Borough Council Housing and Homelessness Prevention Strategy 2023-2027.

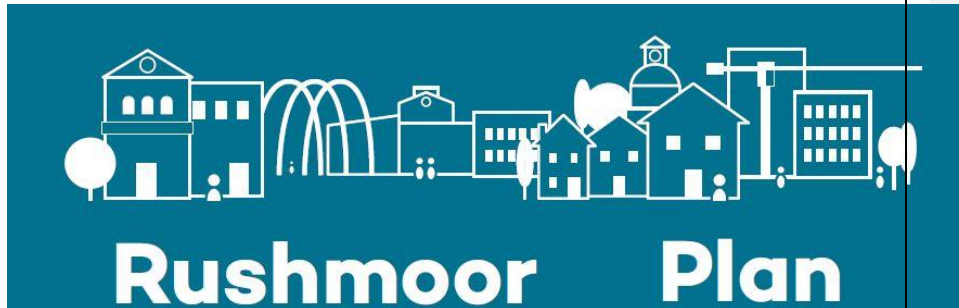
CONTACT DETAILS:

Report Author – Zoë Paine/ zoe.paine@rushmoor.gov.uk/ 01252 398687

Head of Service – Tim Mills/ tim.mills@rushmoor.gov.uk/ 01252 398542

Appendix 1 Tracked Changes Document

Appendix 2 EIA Documents



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AFFORDABLE HOUSING SUPPLEMENTARY PLANNING
DOCUMENT

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AFFORDABLE HOMES DELIVERY

WITHIN NEW HOUSING DEVELOPMENT

Commented [AB1]: My suggestion would be 'Affordable Housing (or Homes?) Delivery within New Development' I think this way round it sounds less like we are going to be delivering it

Draft Supplementary Planning Document 2025

DATE

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1. Introduction

What is a Supplementary Planning Document?

- 1.1. A Supplementary Planning Document (SPD) elaborates upon policies in the Development Plan, in this instance the Rushmoor Local Plan 2014-2032¹ (adopted February 2019). SPDs are one of the material considerations that can be taken into account when determining a planning application.

1.2. This SPD elaborates upon Local Plan Policy LN2: Affordable Housing and was subject to six weeks public consultation between 3 June 2019 and 15 July 2019 and adopted by the Councils Cabinet on 17 September 2019.

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What is the purpose of this SPD?

1.3 The SPD supports the council in delivering its key priorities which are:

- a) Skills, Economy & regeneration
- b) Homes for All: Quality Living, Affordable Housing
- c) Community and Wellbeing: Active Lives, Healthier and Stronger Communities
- d) Pride in Place: Clean, Safe and Vibrant Neighbourhoods
- e) The Future and Financial Sustainability

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~~1.3-~~ **1.4** The purpose of this SPD is to provide further guidance to support the implementation of the affordable housing policies of the Rushmoor Local Plan and housing delivery objectives of the Rushmoor Housing and Homelessness Strategy 2017-2022².

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~~1.4-~~ **1.5** A core purpose of this SPD is to ensure the delivery of affordable housing that meets residents' needs and aspirations, and which supports the delivery of sustainable, inclusive communities.

National Policy Context

~~1.5-~~**1.3** Chapter 5 of the National Planning Policy Framework (NPPF) December 2024-2019 confirms the importance of significantly boosting the supply of homes and delivering housing needed for different groups in the community, including those who require affordable housing.

¹ <https://www.rushmoor.gov.uk/rushmoorplan>

² <https://www.rushmoor.gov.uk/housingstrategies>

~~1-6-1.4.~~ Paragraph ~~642~~ states that planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:

- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
- b) the agreed approach contributes to the objective of creating mixed and balanced communities.

~~1-7-1.5.~~ Paragraph ~~653~~ states that ‘the provision of affordable housing should not be sought for residential developments that are not major developments... To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount’.

~~1-8-1.6.~~ The national planning policy definition of affordable housing is included in the Glossary of the NPPF which is repeated in the Glossary of this document. However, an extract of the definition is provided below:

Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) ~~Affordable housing for rent~~*Social Rent*
- b) ~~Starter homes~~*Other affordable housing for rent*
- c) *Discounted market sales housing*
- d) *Other affordable routes to home ownership*

Local Policy Context

~~1-9-1.7.~~ To support the provision of the overall level of housing required, and the mix of housing types and tenures, the Council jointly commissioned a Strategic Housing Market Assessment (SHMA)³ with Hart and Surrey Heath councils. The SHMA (2016) identifies a need in Rushmoor for 160 affordable subsidised rented homes per annum (social or affordable rent). In addition, there is a need for 220 intermediate (subsidised home ownership) homes a year.

~~1-10-1.8.~~ The SHMA and Local Plan Viability Evidence have informed the Local Plan Affordable Housing Policy (LN2) detailed below:

Policy LN2 - Affordable Housing

The delivery of affordable housing will be supported by requiring developments, subject to site viability, to provide:

³ <https://www.rushmoor.gov.uk/shlaa>

- a) *On sites of ~~11~~ or more dwellings, a minimum of 30% of dwellings as affordable homes;*
- b) *On sites within Aldershot and Farnborough town centres of 11 or more dwellings, a minimum of 20% of dwellings as affordable homes;*
- c) *A site appropriate mix of dwelling sizes designed to meet local needs, as set out in the SHMA (2016) or any subsequent update;*
- d) *Predominantly subsidised rented affordable housing, in order to best meet local needs as set out in the SHMA (2016) and any subsequent update, with a smaller proportion of intermediate affordable housing, to help create mixed communities;*
- e) *The integration of affordable housing with market housing, unless the development is 100% affordable housing;*
- f) *On sites of 15 or more dwellings, on-site provision of affordable housing, unless there are exceptional circumstances, in which case a commuted sum of equivalent value will be required;*
- g) *On sites of 11 to 14 dwellings, either on-site provision of affordable housing or a commuted sum of equivalent value; and*
- h) *Subject to site suitability, affordable dwellings to 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).*

Commented [JH3]: Appreciate that this is the policy wording and will be a matter for any new local plan but can this be set at 10 or more instead?

Commented [ZP4R3]: @Jake Hamilton Alice and Jamie took a look at this - we will leave as is as quoting the Local Plan.

~~1.14.1.9.~~ On site affordable housing provision in accordance with Local Plan Policy LN2 will be secured by a Planning Obligation (Section 106 Legal Agreement) unless the developer can demonstrate that the development would be made unviable as a result of the policy requirements, or the developer has difficulty procuring a Registered Provider (see paragraphs 2.15-2.17 for further information).

~~1.12.~~ The Rushmoor Housing and Homelessness Prevention Strategy ~~2023-2027~~~~17-2022~~⁴(2017) aims to ensure that Rushmoor's residents have access to good-quality homes that are affordable and appropriate to their needs. ~~It identifies the need for housing for different groups and includes actions in relation to the delivery of specialist housing. These groups include those leaving the Army and their families, who have priority status for home ownership schemes and 'local connection' status with any local authority to which they present as homeless, and the Nepali community, many of whom are former Gurkhas and their families who have settled in the Borough. The Council works in partnership with providers to meet the specialist needs of~~

⁴ Housing and Homelessness Strategy <https://www.rushmoor.gov.uk/housingstrategies>

~~disabled veterans and the older population through the Housing and Homelessness Strategy and to address issues of access to housing. Demand for all forms of housing is high, as an area with limited land supply the delivery of on-site affordable homes is a priority for the council.~~

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~~When does this guidance apply?~~

~~1.13.1.10.~~ This guidance applies to all schemes in the Borough that generate a need to provide affordable housing in accordance with Rushmoor Local Plan Policy LN2 – Affordable Housing.

Early Engagement

~~1.14. We recommend that development proposals be discussed with the Council's Housing Strategy and Enabling Team before a planning application is submitted to identify and resolve any issues at an early stage. The Housing Strategy and Enabling Team can advise on the tenure mix and design of policy compliant schemes, which meet housing need, as well as capital funding available to support scheme viability. There is no charge for this advice.~~

Commented [AB5]: Just checking that you want developers to approach you before they approach us for pre-app advice as I think this could be worded slightly clearer?

Commented [JH6R5]: Or do we engage with Housing Strategy and Enabling Team as part of pre-app process?

~~1.11. The Council encourages all applicants to engage in a pre-application discussions with the Development Management Team and this should include engagement with the Housing Strategy and Enabling team. This is a fee charging service, further information on pre application can be found here <https://www.rushmoor.gov.uk/article/3433/Pre-application-advice>. If the applicant does not engage in pre-application discussions, then they will still need to engage with the Housing Strategy and Enabling team.~~

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~~1.15. In addition, the Council's Development Management Team can provide pre application planning advice; this is a fee charging service. Further information on pre application can be found here: <https://www.rushmoor.gov.uk/article/3433/Pre-application-advice>~~

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2. Affordable Housing: On Site Provision

Mix of affordable units

2.1. 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 subsidised rent (social rent or affordable rent models) and 30% for intermediate housing (~~low cost~~low-cost home ownership). ~~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.~~

2.2. The Local Plan identifies the following house size mix to enable the Council to meet affordable housing need in the longer term:

- One-bedroom: 30%
- Two-bedrooms: 30-40%
- Three or more bedrooms: Around 30%, with 10% sought as 4 bedrooms.

- 2.3. To best meet housing needs, the two-bed requirement should provide a mix of houses and flats. To offer maximum flexibility, two-bed homes should be able to accommodate occupation by four people.
- 2.4. The Council recognises that the full house type mix may not be appropriate on all sites, however, the Council's objective is to secure policy compliant development wherever possible. The developer must evidence where this is not appropriate and consult with the Housing Strategy and Enabling Team before submitting a planning application.
- 2.5. 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 subsidised rent and 30% for intermediate products (e.g. shared ownership). The National Planning Policy Framework (2019 December 2024) states that where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs across Social Rent, other affordable housing for rent and affordable home ownership tenures. decisions should expect at least 10% of the homes to be available for affordable home ownership⁵ 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 exempt⁶. However, the exact affordable mix will be dependent upon site-specific circumstances (e.g. site size and location), local needs and viability. All affordable tenures must meet the definitions set out in Annex 2 of the National Planning Policy Framework (repeated in the Glossary of this document).

Commented [AB7]: The NPPF no longer specifies a percentage, so need to re-think what we say here

Commented [ZP8R7]: [@Alice Barrell](#) Would you be able to add in the appropriate working from the NPPF?

Affordability of rented units

- 2.6. Affordable homes must be genuinely affordable to those whose incomes do not allow them to rent or buy a home that is suitable for their needs on the open market. Importantly affordable and social rented homes in the Borough must be affordable to the households in the Rushmoor Housing Allocation Pool (those residents who the Council nominates to rented homes). Local income data informs the Council's approach to rent setting.
- 2.7. The measure of affordability that developers should consider when appraising schemes is that rents should not exceed 30% of lower quartile gross household incomes.

⁵ 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.

⁶ NPPF (February 2019), Paragraph 64 provides further detail on the exemptions

- 2.8. Income data can be accessed at www.ons.gov.uk. ~~In addition, income data for those waiting for affordable housing in Rushmoor is available on request from the Housing Strategy and Enabling Team.~~
- 2.9. The Council's preference is for ~~S~~social ~~R~~rent, wherever possible. ~~Social Rent is set at lower rates than affordable rent, Homes England capital grant is available to subsidise the delivery of social rent in Rushmoor (see Section 4 for more details).~~ Social rented units delivered in Rushmoor should be calculated using the National Guidance on Rents available at www.gov.uk/government/publications/guidance-on-rents-for-social-housing
- 2.10. Where Affordable Rents are used the Councils preferred rent-setting framework is:
- One-, two- and three-bed properties: 70% of the open market rent or the Local Housing Allowance, whichever is the lower;
 - Four- and five-bedroom properties: 65% of open market rent or the Local Housing Allowance, whichever is the ~~lower; lower.~~
 - ~~A rent cap in the region of £250 per week for a four bed property;~~
 - Other such rents as agreed with the Council.
- 2.11. Local Housing Allowance rates are available at:
<https://www.rushmoor.gov.uk/article/3079/Local-Housing-Allowance-LHA-for-private-tenants>

Commented [ZP9]: Can we have a discussion about Social Rent as if we are prioritising as per government agenda then it impacts viability as needs to come from land value not Homes England funding if part of S106

Commented [AB10R9]: I think this wording is probably OK as we are saying it's a preference and not a requirement, and we say 'wherever possible' which arguably would only include situations where it is viable to provide social rent over affordable rent

Procuring a Registered Provider

- 2.12. Registered Providers own and / or manage the affordable housing stock (social rent and shared ownership) in the Borough. Therefore, early engagement with Registered Providers (RPs) that operate in the Borough is actively encouraged as this will potentially reduce design related issues with the dwellings, ~~but also in the longer term early engagement of an RP could result in reduced management costs to future residents.~~ The Council's Housing Strategy and Enabling Team maintain a list of RP partners that are active in the Borough, which can be provided upon request.

Developers are also encouraged to register with Homes England Section 106 Affordable Housing Clearing Service where sites with planning can be listed to seek RP interest.

- ~~2.12.~~ The Section 106 Affordable Housing Clearing Service - GOV.UK

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- 2.13. Once a Registered Provider has been secured for a development, the Council will enter into a nomination agreement with them. This is a contract, which allows the Council to nominate those in housing need to affordable homes as they become available.
- 2.14. It is important to note that Registered Providers let their properties in accordance with their own tenancy policies. However, the Borough Council encourages RPs to take account of the Council's Tenancy Strategy⁷ when setting their policies.

Difficulty Procuring a Registered Provider

- 2.15. The Council recognise that for some development, particularly on smaller sites, a situation may arise where the developer is unable to fulfil the affordable housing obligations as, despite all reasonable efforts, no Registered Provider (RP) is willing to procure the affordable dwellings. This may be due to a number of factors, such as the tenure proposed does not fit the RPs business model or the financial offer submitted by the RP may not cover the developers reasonable build costs.
- 2.16. In these circumstances and where provision has been made within the Section 106 legal agreement the developer may apply to the Council to commute onsite provision of affordable housing to a financial sum. The Council will need to be satisfied that the developer has made all reasonable efforts to dispose of the affordable housing to an RP, including evidence that the site has been listed with the Homes England Section 106 Clearing Service. Evidence of all correspondence and offers must be provided. ~~and they will be required to evidence details of any offers received from RPs or correspondence with RPs.~~ This may also include financial information on the sum the developer is seeking for the affordable dwellings to ensure that cost is not the overriding factor in the failure to procure an RP.

⁷ www.rushmoor.gov.uk/housingstrategies

- 2.17. If the Council agrees, the affordable housing obligations may be commuted to a financial payment to fund off site provision (see below). However, it is important to note that the Councils priority remains the provision of affordable housing on the application site and this cascade to a financial sum is the last resort. Before considering requests, the Council will first explore with the developer whether amended affordable housing scheme, including changes to the number, type, tenure and location within the site, will make on site provision possible.

Accessible and Adaptable Homes

- 2.18. Rushmoor Local Plan Policy LN2 (criteria h) requires affordable housing to be accessible and adaptable standards to meet the requirements of the Building Regulations M4(2), unless the site is unsuitable. This is to support the ageing population and the specific needs of people with mobility problems.
- 2.19. In addition, where evidenced by local need, a proportion of affordable dwellings should be built as wheelchair-user homes to meet the requirements of Building Regulations M4(3). The Housing Strategy and Enabling Team can advise on the level of need.
- 2.20. Standards for accessible and adaptable homes are contained within Building Regulations Approved Document M: Volume 1 (2015). This is available online at:
<https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m>

Commented [JH11]: Can we differentiate between M4(3)2(a) and 2(b) dwellings, i.e. adaptable or fully fitted out?

Commented [ZP12R11]: @Jake Hamilton Can you advise on what we should be asking here? I am not that familiar with the Building Regs changes, is it that all new build are now built to M4 3 anyway so we would only be asking for M4-2 for fully adaptable wheelchair user homes?

Internal Space Standards

- 2.21. To achieve a satisfactory living environment, homes should meet the internal space standards set out Local Plan Policy DE2 – Residential Internal Space Standards. These standards reflect the nationally described space standard, which was published by the government in 2015.

Residential Amenity Space Standards

- 2.22. Access to outside green space is important to people's health and well-being, particularly children. To achieve a satisfactory living environment, homes should meet the standards set out Local Plan Policy DE3 – Residential Amenity Standards.
- 2.23. Amenity space can be in the form of private or communal gardens, balconies, and/or roof terraces. The minimum requirements for private outdoor space are:
- Flatted development: a balcony of a 5 sq m which is accessible from the main habitable room
 - 1 or 2 bed houses: 15 sq m garden
 - Residential units of Two bedrooms or more: 30 sq m garden space
- 2.24. For flatted developments, if it is not possible to provide external balconies, Juliet balconies with compensating internal space in the living area may be acceptable. Ideally, balconies should have enclosures that are safe, offer some degree of privacy, and be robust enough to take clothes-drying equipment and furniture.

Other Design considerations

2.25. Housing design must be genuinely tenure blind, therefore affordable and market dwellings must be completely indistinguishable across the different tenures. It is preferable if affordable units are dispersed in small clusters throughout the development.

2.26. The Council has analysed the outcome of new-build affordable housing schemes in the borough, and it is our view that consideration of the issues set below can reduce housing management issues in completed properties. The council therefore requires:

- Circulation space near the entrance to allow space to accommodate outside items, such as prams, umbrellas, coats and shoes.
- Direct entry from the outside into a living room should be avoided.
- Clear circulation space provided in bathrooms, that meet (or preferably exceed) the standards set in Optional technical Standard M4(2) of building regulations. This will allow properties to be used by a wide range of occupiers, including those with mobility problems.
- In larger homes, careful thought should be given when designing open-plan living and dining and kitchen areas, taking into account the number of potential occupiers and the need for some quiet space.
- All rooms, except internal bathrooms, should have natural light.
- Double and twin bedrooms must be capable of being used interchangeably to reflect the occupancy rates expected of affordable housing. A minimum width of 2.75 metres allows this to be achieved.
- Layouts should be planned so that the effect of noise from adjoining properties is minimised in sound-sensitive rooms (for example, bedrooms).

2.27. In addition, lack of internal and external storage space is frequently identified as an issue in new dwellings. The provision of internal built-in storage space in excess of the nationally described space standard will therefore always be welcomed.

2.28. Good design can incorporate bin storage into a scheme so that bins are easily accessed from the home but do not harm the appearance of the development. Arrangements that require rubbish to be taken through the home should be avoided. Consideration should be given to the size of the bin stores and how bins will be collected. Further information is available online at: www.rushmoor.gov.uk/article/3434/Rubbish-and-recycling-bins-at-new-or-converted-properties

High-density developments (flats)

2.29. Although high density usually results in the development of flats, concentrations of similar housing types should be avoided, and developers should aim to provide a mix of housing types wherever possible, although it is acknowledged that site specific factors (such as location) will influence the type and density of residential units provided.

Commented [AB13]: Do we need to review this in light of the appeal on Blandford regarding the layout of AH?

Commented [JH14R13]: Also how does this align with what RPs want? 'Pepper potting' has always been the ideal but in my experience RPs will say that a cluster is easier for them to manage.

Commented [ZP15R13]: The Blandford and Malta Barrack appeal enabled us to achieve this as they had proposed all of the AH in one main area. We can add "in small clusters" Jake as yes RPs don't really like having individual units dotted around.

- 2.30. To enable the effective management of residential buildings containing flats, the number of units served by a single entrance should be limited. The Council and its partners have found that no more than 12 units served by a single entrance point works well.

3. Affordable Housing Off Site Provision (Commuted Sums)

- 3.1. Local Plan Policy LN2 enables the use of commuted sums (a financial contribution) towards off site affordable housing provision for schemes of between 11 and 14 dwellings or schemes greater than 15 units in exceptional circumstances.
- 3.2. The Council's preference is to deliver affordable housing units on-site. As noted above, in exceptional circumstances, the Council may agree that the local housing need can best be met by a financial contribution for off-site provision.
- 3.3. The financial contribution will be calculated using the following formula:

Gross Development Value (with 100% market housing) – Gross Development Value (with 30% affordable housing)

In Aldershot and Farnborough Town Centres, the financial contribution will be calculated as follows:

Gross Development Value (with 100% market housing) – Gross Development Value (with 20% affordable housing)

Note: that the calculation of Gross Development Value with affordable housing should be based on 70% subsidised rented and 30% intermediate tenure.

- 3.4. It is important to note that the developer will be asked to provide financial appraisals to support the inputs / assumptions for determining the financial contribution. The Council will submit this appraisal for an independent financial assessment, with the costs borne by the developer. All commuted sum funding received is ring-fenced for affordable housing delivery.
- 3.5. A worked example of how to calculate commuted sums is shown below for a 160 unit residential scheme in a part of the Borough where the 30% affordable housing requirement applies is set out overleaf:

Step 1 - Calculate Gross Development Value of the scheme with 100% market housing as shown below:

Dwelling Type	Number of units	Open Market Value Per Unit	GDV per dwelling unit type
1 Bedroom	38	£230,000	£8,740,000
2 Bedroom	42	£300,000	£12,600,000
3 Bedroom	80	£400,000	£32,000,000
		Total:	£53,340,000

Step 2 – Calculate the number of affordable units by dwelling type required by Local Plan Policy DE2 with a split of 70% Subsidised Rent and 30% Intermediate.

Dwelling Type	Total Number of units	Total Number of Affordable units (30%)	Subsidised Rent units	Intermediate units
1 Bedroom	38	11	8	3
2 Bedroom	42	13	9	4
3 Bedroom	80	24	17	7
		48	34	14

Step 3 – Calculate the Development Value of the Affordable Housing units on the assumption that subsidised rented units are valued at 55%⁸ of the Open Market Value (OMV) and Intermediate units are valued at 65%⁹ of the OMV.

Dwelling Type	Open Market value	Subsidised Rent Value (55% OMV)	Intermediate value (65% OMV)
1 Bedroom	£230,000	£126,500	£149,500
2 Bedroom	£300,000	£165,000	£195,000
3 Bedroom	£400,000	£220,000	£260,000

⁸ To reflect the typical discount of 45% of the PMV that is secured for subsidised rented units

⁹ To reflect the typical discount of 35% of the PMV that is secured for intermediate units

Step 4: Calculate the Gross Development Value of a policy compliant scheme using the four steps below:

a) Market Homes (70%)

Dwelling Type	Market Units	Market Value	Total value
1 Bedroom	27	£230,000	£6,210,000
2 Bedroom	29	£300,000	£8,700,000
3 Bedroom	56	£400,000	£22,400,000
			£37,310,000

b) Subsidised rented units

Dwelling Type	Number of subsidised rent units	Subsidised rent units value	Subsidised Rented total value
1 Bedroom	8	£126,500	£1,012,000
2 Bedroom	9	£165,000	£1,485,000
3 Bedroom	17	£220,000	£3,740,000
			£6,237,000

c) Intermediate units

Dwelling Type	Number of intermediate units	Intermediate rent units value	Intermediate total value
1 Bedroom	3	£149,500	£448,500
2 Bedroom	4	£195,000	£780,000
3 Bedroom	7	£260,000	£1,820,000
			£3,048,500

d) GDV of policy compliant scheme (a+b+c) = £46,595,500
(£37,310,000+£6,237,000+£3,048,500)

Step 5 – Calculate Commuted sum

Gross Development Value (with 100% market housing) – Gross Development Value (with 30% affordable housing)

£53,340,000 (Step 1 output) – £46,595,500 (Step 4 output) = **commuted sum £6,744,500**

4. Viability

Viability Appraisals to justify a departure from Policy LN2

- 4.1. The Local Plan is supported by Evidence base including the Local Plan and Community Infrastructure Levy Economic Viability Study (2017)¹⁰ that has considered the effect of the requirements in the Local Plan to ensure that the combined total impact of such requirements does not threaten the viability of the sites and scale of development identified in the development plan.
- 4.2. Where schemes do not meet the policy requirements for potential viability reasons (such as those set out in Policy LN2: Affordable Housing), the Council will require applicants to submit an open book viability assessment in line with [government guidance](#) as part of the planning application submission. It is important to note that this information will be made available in the public domain. In such cases, the Council will commission an independent review of the viability assessment, the cost of which should be met by the applicant.
- 4.3. Where the viability case is supported by the independent review and the Council accepts that meeting the full affordable housing requirement makes the scheme unviable, flexible arrangements relating to the timing and level of planning obligations may be considered if the scheme would otherwise not be able to proceed.
- 4.4. A Financial Viability Assessment (FVA) is only current at the time it is prepared. Financial viability will vary over time with the changing economic and property markets. Therefore, the council will require viability review mechanisms through s106 agreements where policy requirements are not met in full at the time permission is granted.
- 4.5. On large sites that are expected to be built out over a period of time or in phases, viability may need to be re-assessed at different points (such as prior to the commencement of each phase). In order to ensure that appropriate affordable housing provision is secured in circumstances where there is a change in viability of a development scheme during its implementation, the associated Section 106 agreement will contain a requirement for re-assessment at later stages in its construction. The Council would expect that all **large developments** including residential development would include at least an out turn retest 75% of the way through the development to compare actual costs and values with those assessed at the application stage and that if viability has improved, for additional affordable housing to be provided on site wherever possible, and an in-lieu contribution to off-site affordable housing otherwise.

Field Code Changed

Commented [JH16]: Do we need to define what we mean by large developments?
Also do we want to consider early and late stage reviews, as per London Plan, to encourage build out if an agreed level of progress is not made on site within a specified period, and then also at a late stage to re-test based on actual costs?

Commented [ZP17R16]: @Alice Barella What would the definition of a large development be?

Commented [ZP18R16]: @Jake Hamilton Are you able to add in something about late stage reviews please? I don't know enough about them.

¹⁰ <https://www.rushmoor.gov.uk/article/10136/Background-evidence-on-viability>

Grant Funding

4.6. The Council may be able to provide capital grant funding in support of affordable housing schemes. Affordable housing must therefore comply with the space standards; these standards also ensure development meets the grant conditions of Homes England. In addition, each scheme must also:

- Meet the standards set out in this SPD;
- Provide homes for rent that comply with the Council's rent-setting formula (see paragraph 2.10);
- Provide the Council with nomination rights;
- Provide an opportunity for chain lettings; and
- In the case of shared ownership, offer additional units to the shared ownership requirement of an s106 agreement or offer a return to the Council in the form of a ground rent or a share in capital growth.

4.7. To assist with the pre-application process, the Council has an online pre-application checklist. This can be found at: www.rushmoor.gov.uk/article/3433/pre-application-advice-for-developers

Vacant Building Credit

4.8. The National Planning Policy Framework (NPPF) (paragraph 65¹¹) provides an incentive for brownfield development on sites containing vacant buildings. National Planning Practice Guidance¹¹ (NPPG) requires that where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the developer should be offered a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought. Affordable housing contributions may be required for any increase in floorspace.

4.9. The Local Plan acknowledges that the Vacant Building credit is intended to incentivise brownfield development on sites with empty or redundant buildings, and that if applicable a 'credit' should be then applied which is the equivalent of the gross floorspace of any relevant vacant buildings being brought back into use (converted) or demolished.

4.10. The Local Plan makes it clear that in considering Vacant Building Credit applications, the Council will have regard to the national policy, which is to incentivise brownfield redevelopment and not simply to reduce the affordable housing requirement of schemes that would have come forward anyway. Sites allocated for development within the Local Plan in Aldershot and Farnborough Town Centres may not be eligible for Vacant Building Credit, as the Affordable Housing requirements have already been reduced in these locations to reflect the higher costs associated with redeveloping brownfield land.

¹¹ NPPG Paragraph: 021 Reference ID: 23b-021-20160519 <https://www.gov.uk/guidance/planning-obligations>

4.11. It is important to note that the vacant building credit does not apply to buildings that have been abandoned. The Council will determine on a case by case basis whether building is vacant or abandoned. As a general principle to qualify for the vacant building credit a building should be vacant at the time a planning application is registered. The credit is only applicable to relevant vacant buildings; the Council will not accept, for example, sheds and non-permanent buildings for the purposes of vacant building credit.

4.12. In instances where the Council considers that a proposed development qualifies for Vacant Building Credit, the following formula should be used for schemes providing on-site affordable housing provision:

Step 1 - Calculate the number of dwellings that should be provided as affordable housing on a given site in accordance with Local Plan Policy LN2: Affordable Housing

Step 2 - Calculate as a proportion, the extent of existing floorspace compared against the proposed floorspace.

Step 3 - Make a deduction to the number of affordable dwellings to be provided based on the proportion identified at Step 2.

4.13. This will be calculated by the formula $RAH = AH - (AD \times E / P)$ where:

RAH = Revised number of affordable housing units to be provided

AH = Expected number of affordable housing units to be provided prior to application of credit in accordance with Local Plan Policy LN2

E = Existing floorspace to be demolished

P = Proposed floorspace to be created

Glossary

Affordable Housing (National Planning Policy Framework ~~December 2024~~2019 definition):

housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

Social Rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan preparation or decision making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.

Other affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

Chain Lettings: Chain letting is an important approach in managing and securing the best use of affordable housing. It ensures that as many tenants as possible are housed in accommodation that is suitable for their needs and encourages mobility of tenants into the right sized home.

For example:

A housing association tenant currently under-occupying moves into a new build one-bed property releasing their property to house an overcrowded household. The smaller property released by the overcrowded household can be allocated as a management move to another household OR be used to house an applicant in the housing allocation pool and so on. Using this approach can achieve several right sizing moves through a single new build property.

Intermediate Housing: Homes for sale and rent provided at a cost above social rent but below market levels. They can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing.

Nomination Rights: Allow the local authority to send referrals (nominations) to [Registered Providers](#) to fill a certain percentage of their vacant at the beginning of a new development and as vacancies arise (re lets). Households or individuals nominated must come from the council's allocations scheme. Nomination Rights are relevant for both rented and intermediate tenures.

Registered Providers (RPs): Government-funded not-for-profit organisations that provide affordable housing. They include housing associations, trusts and co-operatives. They work with local authorities to provide homes for people who meet the affordable homes criteria. As well as developing land and building homes, they undertake a landlord function by maintaining properties and collecting rent.

Social rented Housing: Owned by local authorities and private registered providers, as defined in Section 80 of the Housing and Regeneration Act 2008, for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental agreements to the above, as agreed with the local authority or with the Homes and Communities Agency (HCA).

Strategic Housing Market Assessment: An evidence base document that:

- Estimates housing need and demand in terms of affordable and market housing
- Determines how the distribution of need and demand varies across the Hart, Rushmoor and Surrey Heath Housing Market Area; and
- Consider future demographic trends and identify the accommodation requirements of specific groups.

Equality Impact Assessment: Screening Tool

The **Equality Impact Assessment (EIA) Screening Tool** should be completed for any new proposal. It helps staff check if their proposal will positively, neutrally, or negatively affect residents, staff, or service users. If the impact is positive or neutral, a full EIA isn't needed.

A **full EIA** is required if the screening shows a negative impact on specific groups. We also advise that a full EIA should be completed when a [key decision](#) is being made. Key decisions are executive actions likely to:

- Significantly affect Council tax, budget balances, or contingencies.
- Have a major impact on communities across two or more Borough wards.
- Expenditure or savings over £100,000 qualify as significant, with a £250,000 threshold for property transactions.

Furthermore, for staff, we generally consider the impact on more than 25 people as significant, which would require a full EIA. If you're unsure, you can seek guidance from the Policy Team.

***After screening, if you identify the need for a full Equality Impact Assessment, you can use your existing answers as a foundation for the full assessment.**

Name of Project	Affordable Housing SPD – Update 2025
Reference number (if applicable)	
Service Area	Property & Growth (Planning Policy /Strategic Housing)
Date screening completed	08/09/2025
Screening author name	Zoe Paine
Policy Team sign off	Alex Shiell
Authorising Director/Head of Service name	Tim Mills

1. Please provide a summary of the proposal

Please outline:

- What are the aims / objectives of this proposal?
- Will this deliver any savings?
- What benefits or change will we see from this proposal?
- Which key groups of people or areas of the borough are involved?

The Affordable Housing Supplementary Planning Document is separate to the Local Plan. It provides additional advice to developers on the delivery of new affordable homes in the borough, usually being brought forward as part of section 106 obligations. The SPD cannot change the policy in the Local Plan, only provide additional guidance on its implementation.

The SPD provides a consistent set of advice on the size and types of homes in need, how they should be situated within a larger site and securing Registered Provider partners. The document also provides

a transparent process for calculating off site affordable housing contributions, although this is always a last resort to meeting housing obligations.

The current Affordable Housing SPD was adopted in 2019. Since then, changes in National Planning Policy, Building Regulations Housing Priorities, increases to rents and benefits have meant that the document has become outdated.

The key areas which are to be updated are:

- 1) Inclusion of the council's key priorities to demonstrate how the Affordable Housing SPD assists the council in meeting these, especially Homes for All: Quality Living, Affordable Housing
- 2) Updated references to the National Planning Policy Framework, particularly the priority now being given to social rent over other affordable housing for rent.
- 3) Reference to the councils Housing and Homelessness Prevention Strategy 2023-2027.
- 4) Change to the council's rent setting framework- to remove a rent cap of £250 per week for a four-bed property as this point has become unviable for Registered Providers and the Local Housing Allowance allows £391.23. The cap was originally set due to the particular affordability concerns of 4 beds when the coalition government introduced Affordable Rent, now the cap works against viability for RPs and developers.

The cap is proposed to be removed rather than being increased as RPs can use the council's prescribed rent framework with rents at up to 70% of open market rent for 1 & 2 beds or LHA, whichever is lower and rents up to 65% of open market rent for 3&4 beds, or the LHA whichever is lower. This works well in most cases and the cap is not needed. If retained, a cap would require an updating and monitoring process which would require resourcing and cost to the council.

It won't deliver cost savings to the council.

The benefit is that the document provides additional information to developers and RPs, over and above that which is contained within the Local Plan to deliver affordable homes in the borough that meet current housing needs.

Key groups of people this will impact are: Low-income households, older and disabled people.

2. Who will the proposal impact? Please indicate Yes or No

Group of people	Impacted?
Residents	Yes
Businesses	Yes
Visitors to Rushmoor	No
Voluntary or community groups	No
Council staff	No
Trade unions	No
Other public sector Organisations	Yes

Others	Please specify:
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3. What impact will this change have on staff? Please complete where relevant:

Please outline in brief:

- Who will be impacted? For example, which services, teams, or buildings?
- How many staff members?
- What will the impact be? (e.g., changes to structure, staffing levels, responsibilities, relocation, or new working methods)

No impact to staff

4. What consultation or engagement will you be leading (with residents, staff, or other stakeholders) as part of this project?

Please outline in brief:

- Which groups will you consult (residents, staff, other stakeholders)?
- Will you collect personal data?
- How will you engage (e.g., surveys, focus groups)?
- How will you use the feedback?

Consultation to focus on residents' staff, neighbouring authorities, private developers and Registered Providers of affordable housing via an online survey.

Personal Data will not be required.

Feedback will be used to make any further amendments to the update, as determined by the Executive Head of Property & Growth in consultation with the Portfolio Holder.

5. What impact will this change have on people with protected characteristics and/or from disadvantaged groups?

Direct and indirect impacts

When completing this table, please consider both **direct and indirect impacts**, see helpful guidance.

Direct discrimination occurs when someone is treated less favourably than another person because of a **protected characteristic**. This includes:

- **Actual possession** of a protected characteristic.
- **Perceived possession** of a protected characteristic (discrimination by perception).
- **Association** with someone who has a protected characteristic (discrimination by association).

A valid comparison must show that someone without the protected characteristic would have been treated better in similar circumstances. It can still be direct discrimination even if the person treating you unfairly shares the same characteristic.

Note: Age discrimination may be lawful if it can be objectively justified. For other protected characteristics, direct discrimination is unlawful regardless of intent or justification.

Indirect discrimination happens when a **policy, rule, or practice** applies to everyone but puts people with a protected characteristic at a **particular disadvantage**. It occurs when:

- A policy is applied equally to all.
- It disadvantages a group sharing a protected characteristic.
- You are personally disadvantaged by it.
- The organisation cannot justify the policy as a proportionate means of achieving a legitimate aim.

If the policy can be objectively justified, it is not considered indirect discrimination.

For example: Closing public toilets may be an example of indirect discrimination, as it affects everyone but disproportionately disadvantages women, due to toilet frequency, alternative options and safety/hygiene factors.

Likely impact

For the groups identified earlier, tick the likely impact (both direct and indirect) on people with protected characteristics (e.g., age, disability, race, etc.):

- **Neutral:** No impact.
- **Positive:** Benefits people with protected characteristics.
- **Negative:** Harms people with protected characteristics.
- **Not Sure:** It's unclear how this affects people with protected characteristics, or more information is needed.

Rate the negative impact as **low, medium, or high**. Also, consider whether the proposal may be seen as controversial or negative by some groups. See the guidance for help.

Protected characteristic - Age

(for example, young people under 25, older people over 65)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes or No	Yes or No	Choose an item:	Yes or No	Delivery of affordable homes for all age groups in need. The SPD is being updated so it clearly links to the council's big-picture priorities. One of those is making sure people have good-quality, affordable homes.

Protected characteristic – Disability

(include people with physical disabilities, people with learning disabilities, blind and partially sighted people, Deaf or hard of hearing people, neurodiverse people. This also includes carers.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes or No	Yes or No	Choose an item.	Yes or No	Requirements for specialist accommodation is included in the AH SPD, for example a required for 10% to be fully wheelchair adaptable.

Protected characteristic - Gender reassignment and identity

(Include people who identify across the trans* umbrella, not only those who have undergone gender reassignment surgery. This is inclusive of girls and or/women, men and/or boys, non-binary and genderfluid people and people who are transitioning) *Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes or No	Yes or No	Choose an item.	Yes or No	Accommodation supports all households; this is related to transparency of housing allocation rather than delivery of new homes.

Protected characteristic - Marriage and Civil Partnership

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes or No	Yes or No	Medium	Yes or No	<p>Accommodation supports all household types and sizes it also supports households when relationships break down. An indirect impact could be that larger low-income families may find 4-bed homes more expensive, even though LHA is increased families who don't qualify for full benefit are likely to be financially disadvantaged.</p> <p><u>Mitigation</u> That said, the Council do have measures in place to support affordability, the policy requires that rents are set at less than 80% of open market rent, with 3- and 4-bed homes capped at 65% of open market rent or the LHA rate, whichever is lower. This approach helps mitigate affordability pressures for Section 106 units. For non-Section 106 units, we are also able to encourage RPs to adopt the rent setting framework and also support them to secure funding for cheaper, social rents which are based on a national rent-setting formula and typically fall within 55–65% of open market rent.</p>

Protected characteristic – Pregnancy and Maternity

(Include people who are pregnant in or returning to the workplace after pregnancy. Could also include working parents.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes or No	Yes or No	Choose an item.	Yes or No	More accommodation can assist pregnant women; however this issue is related to transparent housing allocation rather than delivery of new homes.

Protected characteristic – Race or ethnicity

(include on the basis of colour, nationality, citizenship, ethnic or national origins)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes or No	Yes or No	Choose an item.	Yes or No	More accommodation can assist people from all races and ethnic backgrounds, again more related to allocation rather than the delivery of new homes. No specific data available on ethnicity held by the council. Data sharing restrictions are in place with DWP on LHA claims.

Protected characteristic – Religion or belief

(include no faith)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes or No	Yes or No	Choose an item.	Yes or No	More accommodation can assist people from all religious backgrounds, again this is more related to allocation rather than delivery of new homes.

Protected characteristic - Sex

(Under the Equality Act 2010 and following the 2025 Supreme Court ruling on 15 April 20205, a person's legal sex is defined as their biological sex as recorded at birth. Trans individuals are still protected from discrimination under the characteristic of gender reassignment.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes or No	Yes or No	Choose an item.	Yes or No	More accommodation can assist people whatever their sex/ gender identity, again more related to allocation rather than the delivery of new homes.

Protected characteristic - Sexual Orientation

(Include people from across the LGBTQ+ umbrella, for example, people who identify as lesbian, gay, bisexual, pansexual or asexual.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes or No	Yes or No	Choose an item.	Yes or No	More accommodation can assist people whatever their sexual orientation, again more related to allocation rather than the delivery of new homes.

Protected characteristic - Other

(e.g. people on low incomes, people living in poverty, looked after children, people with care experience, people who are homeless, people with mental health problems, people who are prison leavers, people affected by menopause, people affected by menstruation and/or period poverty)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
Yes or No	Yes or No	Choose an item.	Yes or No	<p>Low Incomes</p> <p>The NPPF now say councils should prioritise social rent (the cheapest type of affordable housing, usually linked to local incomes) over other tenures like 'affordable rent' or 'shared ownership.' positively impacting households on low incomes, those who are homeless and in some cases those with support needs.</p> <p>Homelessness</p> <p>The SPD now mentions and lines up with the council's wider housing and homelessness plan for 2023–2027. That strategy has goals around preventing homelessness, tackling rough sleeping, and providing homes for vulnerable groups. Linking the SPD to it shows the council is aware of these issues.</p>


6. Screening Decision

Outcome	Yes or No
Neutral or Positive – no full EIA needed*.	Yes
Negative – Low Impact – full EIA at the service director's discretion*.	
Negative – Medium or High Impact – must complete a full EIA.	
Is a full EIA required? Service decision:	
Is a full EIA required? [Policy Team] sign off recommendation:	No
Flag for DPIA (will include engagement that collects personal data). [Policy Team]:	
Flag for ethics (high risk / will involve engagement with vulnerable residents):	

Once you've completed the screening tool and determined that the proposal is likely to have a positive or neutral impact on people with protected characteristics, the following can be included in the 'Equality Impact Assessment' part of the report. ***'An equality impact check found that this proposal would have a positive or neutral impact on people with protected characteristics. Therefore, a full assessment is not required.'***

Please send this completed EIA Screening Tool to Policy@rushmoor.gov.uk for quality checking by the policy team.

If required, please continue to the full assessment below.

Member	Name	Signed	Date
Staff member completing this form	Zoe Paine		23/9/25
Policy Team	Martin Iyawe		23/9/25
Director or Head of Service	Tim Mills		23/9/25