

| Representations on FBC089 Revised Affordable Housing Background Paper | | | |
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| Name of respondent | Specific paragraph (if any) | Issues Raised | Council Response |
| Anne Brierley | 3.5 | Concern over the lack of justification for the reduction in applicants on the Housing Register for the year 2021/2022, and the reliability of historic data on applicants on the Register. | The Council has recently undertaken a comprehensive review of the Register. Paragraph 3.9 of the Background paper states that the eligibility on the Register has not changed but the Council has contacted applicants to ensure there is still a need and the information on the Register remains the same in relation to their personal circumstances. This is what has led to a reduction of applicants on the Housing Register. |
| Shaun Cunningham | 3.16 | <p>Concern over the justification for the data source used to assess concealed households.</p> <p>Concern over the lack of justification for the reduction in applicants on the Housing Register for the year 2021/2022, and the reliability of historic data on applicants on the Register.</p> <p>Concern that the affordable housing calculation has been retrofitted to the need figure.</p> | <p>The National Planning Practice Guidance (PPG) lists a number of 'suggested' sources of information to estimate affordable need. Paragraphs 3.14 to 3.16 provide reasoning for the use of the 2011 Census data. It should be noted that the 2021 Census data in relation to concealed households will not be published until at least 2023.</p> <p>The Council has recently undertaken a comprehensive review of the Register. Paragraph 3.9 of the Background paper states that the eligibility on the Register has not changed but the Council has contacted applicants to ensure there is still a need and the information on the Register remains the same in relation to their personal circumstances. This is what has led to a reduction of applicants on the Housing Register.</p> <p>The Council has undertaken a robust assessment to calculate the affordable housing need and supply using the requirements listed in the PPG. The evidence supplied in the paper is comprehensive and realistic given</p> |

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| | | | the recent update of the Council's Housing Register where national statistical data has either not been available or up-to-date. |
| Gillings Planning (on behalf of Persimmon Homes) | 3.32 | Concern over the approach to calculating the newly arising need. | The PPG emphasises that LPAs should 'estimate' their affordable housing need in line with a number of suggested data sources. The Council provides robust justification for using the evidence in the topic paper in line with the relevant PPG requirements for its affordable housing need. The evidence supplied in the paper is comprehensive and realistic given the recent update of the Council's Housing Register where national statistical data has either not been available or up-to-date. |
| | 3.33 | <p>The approach taken towards calculating newly arising households that are unable to afford market housing is flawed and incorrect as it ignores the existing unmet affordable housing need. Concern that the affordable housing need calculation does not properly consider those that are not currently in need but will fall into need during the plan period and this element of need has been ignored.</p> <p>Affordability is increasingly becoming an issue and this has not been factored into the calculations for affordable need.</p> | <p>Disagree. The existing affordable need will be met through the current and future available affordable housing stock. Paragraph 4.11 of the Background Paper states that the overall affordable housing need is for 5,422 households. The total existing available housing stock is 2,639 which is then subtracted from the need to provide an unmet affordable housing need for the borough over the Plan period in paragraph 4.12 of the paper (2,783 households). It is this proportion of need that will be met by the Local Plan. Chapter 4 of the Background Paper provides information on the total identified affordable housing supply from existing permissions and committed housing sites to meet the identified unmet need.</p> <p>The affordability ratio is factored into the standard method calculation. Therefore, the consideration of affordability and an uplift for market signals has already been factored into the Council's overall housing need.</p> |

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| | 4.2 | Concern over the validation of the re-lets figure over the plan period and that the potential re-lets is a double counting error. | Disagree. Paragraph 22 of the PPG states that assessing the total affordable housing supply includes identifying the number of affordable dwellings that are going to be vacated by current occupiers that are suitable for others to use. The government report annual statistics on the number of re-lets available ¹ . Furthermore, those houses awaiting reletting due to void works at the point of reporting will eventually be counted in the re-let statistics for the reporting year in which they were re-let, so there is no risk of double counting. |
| | 4.3 | Concern over the proportion of affordable housing delivery that has been assumed in Table 3 and there should be an analysis of historic provision of affordable housing. | <p>The proportion of affordable housing assumed in Table 3 has been calculated using the proportions set out in Policy HP5. As highlighted at the Hearings the affordable housing proportions set in Policy HP5 have been through rigorous viability testing and the Council consider these to be reasonable and realistic.</p> <p>Disagree with the analysis of previous affordable housing contributions from windfall sites. FBC077 (Windfall analysis following examination) provides a list of historic windfall sites. It should be noted that a number of these sites including <u>P/12/0299/FP</u> (Coldeast Hospital), <u>P/12/0644/FP</u> (Hinton Hotel) provided 40% affordable housing.</p> |
| | Table 3 and 4.5 | Concern over the assumptions for the proportion of affordable housing from windfall sites. Note there is an error between the windfall contribution figures in Table 3 (156) and 4.5 (168). | The Council note the error in paragraph 4.5 of the Background Paper in relation to the annual contribution from windfall sites and the total contribution of windfall sites in relation to affordable housing over the plan period however table 3 was correct at the time of writing. |

¹ <https://www.gov.uk/government/statistics/social-housing-lettings-in-england-april-2020-to-march-2021>

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| | | | <p>The Council have re-examined large windfall sites contributions that were for 10 or more dwellings in the Council's latest windfall analysis (FBC077). 19 permissions were granted between 2009/10-2020/21 for 10 or more dwellings providing a total of 348 dwellings. Applying a modest 30% affordable contribution based on historic affordable housing contributions from windfall sites, this equates to 104 dwellings in total or an average of 9 dwellings per year over the twelve monitoring years. This figure is multiplied by the number of years that large sites are expected to contribute through the plan period (11) to give a final total of 99 affordable windfall units.</p> <p>It should also be noted that between 2021 and 2022, there were 39 affordable completions that took place. Therefore, with the projected affordable completions for remaining plan period, an alteration is required to the final affordable housing supply figure to 2,709, instead of 2,727 as written in the topic paper.</p> |
| Miller Homes | 1.42 | <p>Council should increase the supply of homes to meet the need and address affordability issues.</p> <p>Concern that the affordable need has not been met historically and will not be met in the future.</p> | <p>Whilst the supply of affordable housing that will be delivered in the Local Plan 2037 is forecast to be slightly less than the projected affordable housing requirement (as set out in FBC089 Affordable Housing Topic Paper), the difference is considered marginal (56 dwellings (now 74 with the change identified above)). With the potential for double counting between categories listed in the PPG and for further data refinement through the release of statistics from the 2021 Census, the Council is confident that the approach is consistent with the PPG requirements, and it is not considered appropriate to increase the supply of homes in the Plan.</p> <p>Noted. There are a number of mechanisms available to bolster the supply of affordable housing on top of the affordable housing supply that are identified in the</p> |

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| | | | Background Paper that have not previously been available. These mechanisms are listed in the Council's Matter 3 Hearing Statement, Q.13. |
| Pegasus Planning (on behalf of Hammond, Miller and Bargate) | 3.33 | <p>Concern that the proportion of the newly arising need is too low (10% of the overall need). Concern that the affordable housing need calculation does not properly consider those that are not currently in need but will fall into need during the plan period and this element of need has been ignored, references Winchester City Council SHMA as a correct way to calculate the need.</p> <p>Concern that the overall affordable need has been underestimated.</p> | <p>Disagree. The existing affordable need will be met through the current and future available affordable housing stock. Paragraph 4.11 of the Background Paper states that the overall affordable housing need is for 5,422 households. The total existing available housing stock is 2,639 which is then subtracted from the need to provide an unmet affordable housing need for the borough over the Plan period in paragraph 4.12 of the paper (2,783 households). It is this proportion of need that will be met by the Local Plan. Chapter 4 of the Background Paper provides information on the total identified affordable housing supply from existing permissions and committed housing sites to meet the identified unmet need.</p> <p>The PPG emphasises that LPAs should 'estimate' their affordable housing need in line with a number of suggested data sources. The Council provides robust evidence in the topic paper in line with the relevant PPG requirements for its affordable housing need and supply. The evidence supplied in the paper is comprehensive and realistic given the recent update of the Council's Housing Register where national statistical data has either not been available or up-to-date.</p> |
| Southern Planning Practice (on behalf of Raymond Brown) | | Concern that the affordable housing calculation has been retrofitted to the need figure. | The Council has undertaken a robust assessment to calculate the affordable housing need and supply using the requirements listed in the PPG. The evidence supplied in the paper is comprehensive and realistic given the recent update of the Council's Housing Register |

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| | <p>Table 1</p> <p>2.3 and 3.32</p> | <p>Concern that affordable housing supply does not meet the identified affordable need.</p> <p>Considers that the reduction in the number of applicants on the Housing Register requires further explanation.</p> <p>Concern that the affordable housing need calculation does not properly consider those that are not currently in need but will fall into need during the plan period and this element of need has been ignored.</p> | <p>where national statistical data has either not been available or up-to-date.</p> <p>Whilst the supply of affordable housing that will be delivered in the Local Plan 2037 is slightly less than the projected affordable housing requirement (as set out in FBC089 Affordable Housing Topic Paper), the difference is considered marginal (56 dwellings (now 74 with the change identified above)). With the potential for double counting between categories listed in the PPG and further data refinement through the release of statistics from the 2021 Census, the Council is confident that the approach is consistent with the PPG requirements and it is not considered appropriate to increase the supply of homes in the Plan.</p> <p>The Council has recently undertaken a comprehensive review of the Register. Paragraph 3.9 of the Background paper states that the eligibility on the Register has not changed but the Council has contacted applicants to ensure there is still a need and the information on the Register remains the same in relation to their personal circumstances. This is what has led to a reduction of applicants on the Housing Register</p> <p>Disagree. The existing affordable need will be met through the current and future available affordable housing stock. Paragraph 4.11 of the Background Paper states that the overall affordable housing need is for 5,422 households. The total existing available housing stock is 2,639 which is then subtracted from the need to provide an unmet affordable housing need for the borough over the Plan period in paragraph 4.12 of the paper (2,783 households). It is this proportion of need</p> |
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| | 4.44 | <p>Concern over the proportion of affordable housing delivery that has been assumed in Table 3 and the position in relation to Welborne and removal of the two town centre sites.</p> <p>Council should increase the supply of homes to meet the need and address affordability issues.</p> | <p>that will be met by the Local Plan. Chapter 4 of the Background Paper provides information on the total identified affordable housing supply from existing permissions and committed housing sites to meet the identified unmet need.</p> <p>The proportion of affordable housing assumed in Table 3 has been calculated using the proportions set out in Policy HP5. As highlighted at the Hearings the affordable housing proportions set in Policy HP5 have been through rigorous viability testing and the Council consider these to be reasonable and realistic. The trajectory in the topic paper already discounts the affordable housing contribution for Fareham Station East and Fareham Station West. The Council have assumed 10% affordable housing delivery at Welborne in the trajectory calculation over the plan period based on the information provided in FBC075 (Welborne S106 Viability Note). It should be noted that the overall target is 30%, subject to viability as set out in FBC075.</p> <p>Whilst the supply of affordable housing that will be delivered in the Local Plan 2037 is slightly less than the projected affordable housing requirement (as set out in FBC089 Affordable Housing Topic Paper), the difference is considered marginal (56 dwellings (now 74 with the change identified above)). With the potential for double counting between categories listed in the PPG and further data refinement through the release of statistics from the 2021 Census, the Council is confident that the approach is consistent with the PPG requirements, and it is not considered appropriate to increase the supply of homes in the Plan.</p> |
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| | | | The error in paragraph 4.5 of the Background Paper is noted. The assumption for windfall only assumes an affordable contribution would be sought on sites of 10 or more dwellings. |
| Tetra Tech (on behalf of the Vistry Group) | | <p>Council should increase the supply of homes to meet the need and address affordability issues.</p> <p>Concern over the proportion of affordable housing delivery that has been assumed in relation to Welborne.</p> | <p>Whilst the supply of affordable housing that will be delivered in the Local Plan 2037 is slightly less than the projected affordable housing requirement (as set out in FBC089 Affordable Housing Topic Paper), the difference is considered marginal (56 dwellings (now 74 with the change identified above)). With the potential for double counting between categories listed in the PPG and further data refinement through the release of statistics from the 2021 Census the Council is confident that the approach is consistent with the PPG requirements, and it is not considered appropriate to increase the supply of homes in the Plan.</p> <p>The Council have assumed 10% affordable housing delivery at Welborne over the plan period based on the information provided in FBC075 (Welborne S106 Viability Note). It should be noted that the overall target is 30%, subject to viability as set out in FBC075.</p> |
| Woolf Bond Planning (on behalf of Foreman Homes) | 3.33 | <p>Concern over the lack of justification for the reduction in applicants on the Housing Register.</p> <p>Concern that the affordable housing need calculation does not properly consider those</p> | <p>The Council has recently undertaken a comprehensive review of the Register. Paragraph 3.9 of the Background paper states that the eligibility on the Register has not changed but the Council has contacted applicants to ensure there is still a need and the information on the Register remains the same in relation to their personal circumstances. This is what has led to a reduction of applicants on the Housing Register</p> <p>Disagree. Table 1 of the Background Paper highlights that the Housing Register has remained consistent over a</p> |

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| | Table 3 | <p>that are not currently in need but will fall into need during the plan period, in particular the consideration of the disparity between wages and house prices.</p> <p>Concern over the assumptions for the proportion of affordable housing from windfall sites.</p> | <p>number of years. The fact that the recent comprehensive review of the Register which demonstrates a large reduction in the number of applicants, suggests that the previous years' figures could have been lower than reported and included a large amount of double counting. Given that the Register has remained relatively static over a number of years the Council does not feel that a specific contribution towards existing unmet affordable housing need is justified. Furthermore, the existing affordable need will be met through the current and future available affordable housing stock. Paragraph 4.11 of the Background Paper highlights that the overall need is for 5,422 households. The need is then subtracted from the total existing available housing stock which provides an unmet affordable housing need for the borough to be addressed by the Local Plan in paragraph 4.12 of the paper (2,783 households).</p> <p>The Council note the error in paragraph 4.5 of the Background Paper in relation to the annual contribution from windfall sites and the total contribution of windfall sites in relation to affordable housing over the plan period, however table 3 was correct at the time of writing.</p> <p>The Council have re-examined large windfall sites contributions that were for 10 or more dwellings in the Council's latest windfall analysis (FBC077). 19 permissions were granted between 2009/10-2020/21 for 10 or more dwellings providing a total of 348 dwellings. Applying a modest 30% affordable contribution based on historic affordable housing contributions from windfall sites, this equates to 104 dwellings in total or an average of 9 dwellings per year over the twelve monitoring years. This figure is multiplied by the number of years that large</p> |
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| | | | <p>sites are expected to contribute through the plan period (11) to give a final total of 99 affordable windfall units.</p> <p>It should also be noted that between 2021 and 2022, there were 39 affordable completions that took place. Therefore, with the projected affordable completions for remaining plan period, an alteration is required to the final affordable housing supply figure to 2,709, instead of 2,727 as written in the topic paper.</p> |
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