

Proof of Evidence of Eastleigh Borough Council on Affordable Housing

Land at Satchell Lane, Hamble le Rice

PINS Ref: APP/W/1715/W/22/3292580

REBUTTAL PROOF OF EVIDENCE

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On behalf of the Local Planning Authority

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1. INTRODUCTION

- 1.1. My name is Emily Howbrook. My experience and qualifications are set out in section 2 of my main Proof of Evidence.
- 1.2. I have prepared this Rebuttal in response to the Appellant's Proof of Evidence on Five Year Housing Land Supply and Affordable Housing Need (WBP ref. 8399, dated October 2022 – herein referred to as the Appellant's Housing Proof), which was received by the Council on 12th October 2022.
- 1.3. My main Proof of Evidence did not address the matter of affordable housing need and supply, but these matters were addressed in section 4 of the Appellant's Housing Proof. This Rebuttal responds to that evidence.
- 1.4. As set out below, the Council does not agree with the suggestion in the Appellant's Housing Proof that a continued significant need for affordable housing is indicated by the Council's waiting list data trends. The Council also does not agree, based on evidence, that "the failure to meet the identified needs of affordable housing is a dire situation" (Appellant's Housing Proof paragraph 4.17). The information set out below provides the most up to date information on the evidence of affordable housing need.

2. EASTLEIGH BOROUGH LOCAL PLAN

- 2.1. As correctly stated at paragraph 4.8 of the Appellant's Housing Proof, the Eastleigh Borough Local Plan (**CD4.1**) includes Policy S2 and a target for delivery of 200 (net) new affordable houses per annum.

3. EVIDENCE FOR PLANNED AFFORDABLE HOUSING NEEDS

- 3.1. As explained by the Plan Inspector in her report on the Local Plan Examination (**CD5.1**), the Council based the Local Plan target for affordable housing on an assessment of affordable housing needs for the Borough, prepared by specialist consultancy ORS (Opinion Research Services). The Plan Inspector in paragraph 165 of her report on the Local Plan Examination states:

"At my request, the Council updated this evidence in the form of the ORS update. This latest evidence takes into account the current unmet need as well as projecting future unmet need, providing a detailed explanation of the various components which make up projected growth for affordable housing. The report concludes that there will be a total need for 4000 affordable dwellings in addition to the current stock, which equates to 200 dwellings per year, or 28% of the requirement. This results in a 35 dwelling per annum increase over and above the requirement of the submitted Plan. The approach adopted accords with both the PPG and the Framework in this regard".

- 3.2. The evidence document reference is ED102 Affordable Housing Update ORS, July 2020. The original assessment of housing need was updated therein (to adjust the figures for the Objectively Assessed Need (OAN) revisions) (Examination Document reference HOU 006). Both these assessments are provided at **Appendix EH7**.
- 3.3. The Inspector went on to consider other issues concerning affordable housing, before providing the following overall conclusion on the subject at paragraph 168: *“Taking into account the modification outlined, the Plan’s approach to affordable housing is sound”*.

4. EVIDENCE OF AFFORDABLE HOUSING DELIVERY

- 4.1. The Council acknowledges, and is planning to meet, a significant need for affordable housing in the Borough during the plan period 2016-2036. The Council does not agree that its HomeChoice (choice-based lettings) waiting list indicates the size of the planned requirement for new affordable housing (as suggested in the Appellant’s Housing Proof paragraph 4.11-12).
- 4.2. The Appellant’s Housing Proof wrongly asserts that, based on the numbers on the waiting list, there is a “shortfall to resolving the ongoing need on the housing register” (paragraph 4.14).
- 4.3. To simplify what is a very thorough statistical analysis of housing need by ORS, a key point is the difference between the housing waiting list (discussed below) and the modelled assessment of need across the Plan period.
- 4.4. ORS’ assessment of need (see **Appendix EH7**) models the households which are defined as being in affordable housing need from a number of sources. For example, households that form during the plan period in housing need, and households migrating to the area. ORS model households which both fall *into* housing need and fall *out* of housing need.
- 4.5. This contrasts with the HomeChoice register (the waiting list) which lists households which have joined the register and are able to bid for properties which are advertised.
- 4.6. Put simply, there will be households in need in the Borough who are not on the register, and households with low priority needs who opt to stay on the register. The register is a valuable tool for the Council’s housing and homelessness prevention duties. However, it does not include only households that are unable to afford their housing costs. As ORS explain in the July 2017 Local Plan submission document (see **Appendix EH7**) paragraphs 2.56-2.57:

“2.56... Reasonable preference categories are defined in the Housing Act 1996, which requires “reasonable preference” for housing to be given to people who are:

» Legally homeless;

» Living in unsatisfactory housing (as defined by the Housing Act 2004);

- » Need to move on medical/welfare grounds; or
- » Need to move to a particular area to avoid hardship.

2.57 However, the number in a reasonable preference category has barely moved in recent years suggesting that the underlying number of households needing affordable housing in Eastleigh borough has not substantially increased recently”.

- 4.7. Looking at the most up to date HomeChoice data (October 2022), Bands 1-3 represent housing need which is Urgent Priority (1), High Priority (2) and Medium Priority (3)¹. The total number of registered households has remained static at around 1,900- 2,000 levels since pre-COVID-19, as shown by Table 19 in the Appellant’s Housing Proof. The latest figures show an increase of registered households (2,306), albeit not significantly greater than figures previously reported (e.g. 2014-15), despite recent economic pressures.
- 4.8. The point here is that using the housing waiting list data does not provide the full picture of priority housing needs in the Borough. The numbers on the Register have fluctuated around the 1,800-1,900 figure in the last five years. The recent increase in the number of households registered in Band 3 (Medium Priority) does not itself reflect a lack of new build affordable housing supply, but rather, the number of households falling into the eligible bands (for example due to insecure housing; welfare grounds; changes in the Prevention or Relief duty since the Homelessness Reduction Act 2017).

Hampshire Home Choice					
Number of households registered with Eastleigh Borough Council on Hampshire Home Choice on 5 October 2022: 2306					
Bedroom Need	Band 1	Band 2	Band 3	Band 4	TOTAL
1	2	34	898	10	944
2	-	19	478	5	502
3	-	19	396	3	418
4+	-	24	72	-	96
Over 60s	1	54	225	66	346
TOTAL	3	150	2069	84	<u>2306</u>

- 4.9. The Council does not dispute that housing registers and local authority and registered social landlord transfer lists will also provide relevant information to help establish the need for affordable housing. The number of households on the register is, however, influenced by a number of factors and not simply the provision of new affordable housing secured through the planning system. The Council considers that the Local Plan evidence (assessment of

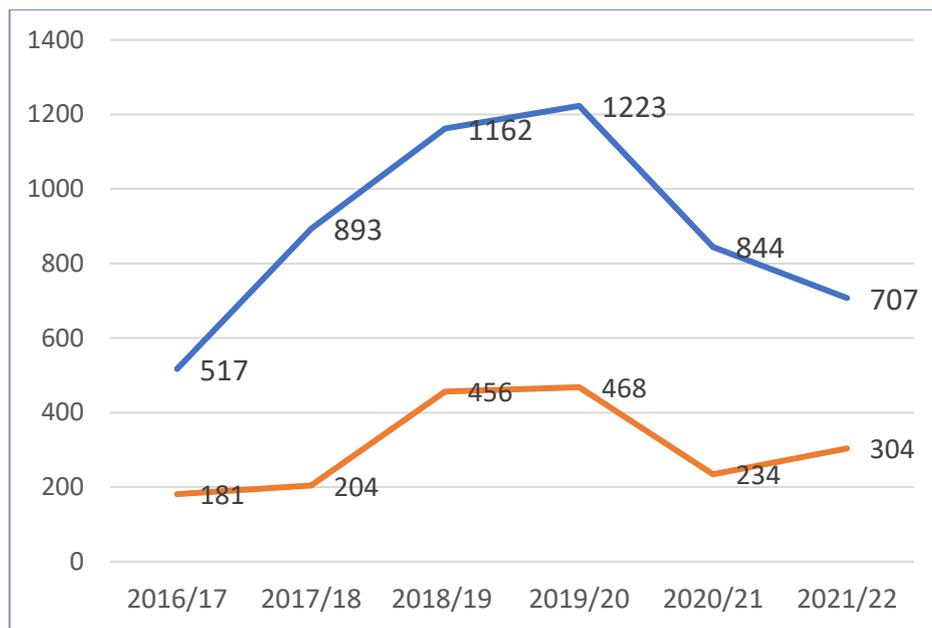
¹ Hampshire Home Choice Allocations Framework (August 2022)
<https://www.hampshirehomechoice.org.uk/Data/Pub/PublicWebsite/ImageLibrary/Version%2022%20-%20HHC%20Allocation%20Framework%20master%20%2026.08.2022%20CURRENT.pdf>

affordable housing need), and associated monitoring, is the most robust source of information for understanding the planned affordable housing needs and supply.

5. MONITORING AFFORDABLE HOUSING DELIVERY

- 5.1. To rebut the suggestion that there is a shortfall in the planned supply of affordable housing in the Borough, it is useful to refer to the completions data alongside the Local Plan target, rather than the HomeChoice Register trends, therefore.
- 5.2. The Council monitors the delivery of affordable housing completions in the Borough (see Figure 1 below) as well as monitoring planned and upcoming completions through its housing enabling function. The future delivery of affordable housing is not 'highly uncertain' therefore, as suggested by the Appellant's Housing Proof (paragraph 4.13).
- 5.3. The average annual net dwelling completions since 2016/17 is 278 dwellings. Appendix C of the adopted Local Plan (CD4.1) includes indicator number 27 'Number and proportion of affordable housing completions'.

Figure 1 Eastleigh Borough net dwelling completions annual total (blue), showing proportion of affordable dwellings (red) (2016/17- 2021/22) Source: HCC Land Supply Monitoring



6. CONCLUSION

- 6.1. The delivery of new affordable housing to meet planned needs in the Borough is a corporate priority of the Council. The adopted Local Plan emphasises the significant need for affordable dwellings in the Borough. This Rebuttal explains the Council's position on affordable housing, and why the Local Plan target of 200 affordable dwellings per annum is the appropriate target.

6.2. The local housing register provides useful context as to the numbers of households eligible and interested to bid for available properties (both new build and re-lets). The Council does not agree, however, that the number of households on the HomeChoice register indicates that there is a shortfall in affordable housing supply to be resolved and considers that this is a simplification of the assessment of affordable housing need.