

FAREHAM
BOROUGH COUNCIL

Consultation Statement

Draft Affordable Housing Strategy

September 2019

Introduction

The following statement provides an overview of the consultation process and feedback received in relation to the Draft Affordable Housing Strategy, as well as the proposed changes arising from the consultation exercise.

When?

Public consultation on the Draft Affordable Housing Strategy took place between the 24th June and the 5th August 2019.

How?

A variety of methods were used to draw attention to the public consultation exercise. These included the following: -

- Notification via the Council's E-Panel & online survey
- Online on the Council's Consultation web-page and linked via the Housing web-pages
- Press release (24th June 2019)
- Paper copies of the Draft Strategy made available at the Civic Offices and Borough libraries
- A5 leaflets in key locations (doctor surgeries etc.)
- Social Media posts relating to the consultation exercise
- Letters or emails to key developers in the Borough
- Letter or email to the Registered Providers/Housing Associations in the Borough
- Email to other partners of Aspect Building Communities Ltd.
- Tenants' Focus Group (4th July 2019) specifically on the Draft Strategy
- Item at Housing Scrutiny Panel (11th July 2019)
- Tenants' and Leaseholders' Forum (25th July 2019) – presentation and overview of the Draft Strategy together with small involvement exercise around priorities

NB: Unfortunately, the timings of 'Tenants Voice' (the tenants' newsletter) meant we were unable to use this to further communicate the consultation period.

Responses:

49 responses (4 anonymously) were received as part of the consultation exercise. This included 46 individual responses from members of the public and responses also from Lee Residents Association, Fareham Constituency Labour Party and Bargate Homes. A summary of the comments, together with a response when appropriate, is provided in Appendix 1.

An overview of the matters/questions raised by the Tenants' Focus Group and the outcomes of the priorities exercise undertaken with both the Focus Group and the Tenants' & Leaseholders' Forum is provided in Appendix 2.

The comments/points raised by the Housing Scrutiny Panel are outlined below.

Housing Scrutiny Panel:

At their meeting on 11th July 2019 the Councils' Housing Scrutiny Panel were provided with a report that gave an overview of the Draft Affordable Housing Strategy. Members of the Panel were invited to provide their comments. A summary of the key points raised are outlined below: -

- Members commented positively about the Draft Strategy, noting that it was very easy and understandable to read.
- Members queried the £80,000 upper household income to be eligible for Shared Ownership housing (page 23 of the draft strategy). Officers advised that this eligibility criteria is set nationally.
- Members enquired about the potential partnership with Registered Providers (page 32 of the Draft Strategy). Officers advised that these partners have access to larger funds to deliver affordable housing and therefore it's important we work positively with them to ensure more affordable homes are built in Fareham.

The above comments are also reflected in the Draft Minutes from that meeting which are available on the Council's website.

Proposed Changes:

The following changes have been made to the Draft Affordable Housing Strategy to inform a final version. This takes account of relevant matters raised as part of the Consultation Process.

- Objective 2, 'to ensure those homes are the right homes in the right places and that they are truly affordable for those that need them', will include an additional action relating to the production of a 'greener policy' which will seek to identify appropriate greener solutions for Council owned housing stock (current and/or new). (Page 20 of the Strategy).

Consultation Statement: Draft Affordable Housing Strategy (September 2019)

APPENDIX 1: Summary of Responses

Matters Relating to the Draft Affordable Housing Strategy: -	Type of Comment	Response
Support for increased affordable housing	Support	Noted
Support for affordable housing for those at the start of the ladder (e.g. shared ownership)	Support	Noted
The document lacks information on environmental sustainability/green credentials for affordable housing (carbon emissions, energy/water efficiency, electric car charging points, more trees to offset emissions etc).	Comment	Noted. It is agreed that this should be recognised more specifically, and an additional Action will be added relating to the formation of a policy that will seek a 'greener' approach to the Council's affordable housing provision
Modular construction is needed to speed the delivery of much needed new homes / modular constructed units could be more affordable for young people and allow them to save	Comment	The Actions to achieve Objective 1 include encouraging 'alternative and innovative AH approaches such as self-build and modular construction'. The benefits of such approaches are recognised but the creation of homes with longevity is also important.
Older residents should be a priority and their homes should take account of the fact that they are often not as mobile	Comment	The Actions to Objective 3 include the production of a Sheltered Housing Strategy which will specifically take account of the affordable housing needs of older people.
Right to buy is counterproductive to providing more affordable homes	Comment	Noted. This is a National Government/Policy matter and available receipts from Right to Buy properties will be used to facilitate further affordable housing in the Borough.
Sufficient supply of affordable homes will only be achieved when the supply is taken away from house building companies	Comment	The Draft Strategy recognises that the delivery of affordable homes will have to be a combined effort, including the delivery via private housing developments.
Objective of the strategy is flawed – the need is not as great. The Strategy assumes those needing affordable housing will need it indefinitely and does not allow for re-assessment / Affordable housing is a drain on finances and the individuals needs should be re-assessed to ensure that if they can afford market rents then they should pay it	Objection	Some of the Council's Shared Ownership programmes will be marketed/highlighted to Council rent tenants to encourage those whose circumstances have improved to move into alternative tenure and free Council homes up for those in greater need. Tenancy agreements do not allow for reassessment.
The document highlights the need for 1,000 homes now but with 3,500 needed over	Comment	Page 9 of the Strategy explains that existing data

Consultation Statement: Draft Affordable Housing Strategy (September 2019)

the next 17 years does this account for growth in demand.		suggests need is in the region of 3,000 and Page 12 introduces the 3,500 figure which includes an allowance for growth.
Why are the Council funding so few properties in the coming years? The document should include more detail on the finances available and more should be spent/done	Comment	The sites identified on Page 15 are those specifically identified at this time. Work is on-going to find further sites and opportunities for additional affordable housing. Page 24 provides an overview of the funding opportunities. More specific information on funding schemes will be formulated for individual projects having an awareness of the Grant available and other sources of funding/borrowing available at the time. This information is not static.
Council owned commercial assets should be sold to provide more affordable homes	Comment	Many of the Council's commercial assets are an important funding stream to support Council services and the sale of such assets will not provide a long-term sustainable solution to the funding of new affordable homes.
Council's should use removal of borrowing restriction to build more	Comment	This remains an option in order to fund the provision of new affordable homes and is listed as a potential funding stream on page 24 of the Draft Strategy.
Homes built by the Council/RPs will be the best way to ensure we get what is needed/homes built by the Council are preferred.	Comment	Noted.
Affordable housing on new developments should not be provided at the expense of other occupants on the development. It should be funded by the taxpayer at national or local level	Comment	Providing affordable housing through s106 requirements on planning is an established mechanism and currently an important part of affordable home delivery. Taxation decisions are national.
Any new Allocations Policy should ensure specific needs are addressed and that they do not remain on the Housing Waiting List indefinitely	Comment	Agreed. This will be considered as part of developing the Council's new Allocations Policy.
Affordable homes should cater for the diverse ages in the Borough, particularly young people	Comment	Agreed.
The document should be clearer on what it means as an affordable home	Comment	Affordable housing is explained on page 6 of the document. This refers to the fact that Affordable Housing is formally defined in the National Planning Policy Framework.
Sheltered Housing and need should come under a different category	Comment	Sheltered housing need can be split off from general purpose affordable need but the intention of the

Consultation Statement: Draft Affordable Housing Strategy (September 2019)

		Strategy is to remain broad in terms of overall affordable need.
Affordable housing should be mixed with private housing to strengthen local communities	Comment	Currently affordable housing tends to be provided in small clusters spread throughout larger developments. Small clusters are important to help the management of the homes, but this is balanced with the creation of mixed communities.
Essential workers should be entitled to affordable housing (e.g. nurses, teachers, etc.)	Comment	Many of these essential workers would be eligible for Shared Ownership or Rent to Buy affordable housing, if required.
More work needs to be done with social care and healthcare providers about the accommodation needs of their clients to avoid hospital discharge delays	Comment	Agreed. The housing needs of individuals to allow for hospital discharge is treated as one of the highest priority groups for re-housing.
More sheltered housing is needed	Comment	Agreed. Page 22 of the Draft Strategy refers to the future production of a Sheltered Housing Strategy.
More affordable homes should be required on private developments	Comment	We can only ask of developments what is viable for them to provide. Viability is a matter outlined through national policy/guidance.
More Social Rent homes are needed given the amount of very poor people in extreme financial difficulty	Comment	Agreed. This will be considered through the Local Plan preparation process and will be considered on Council led affordable housing developments. It is however costlier to provide.
Concern about the definition of 'right place' where infrastructure is insufficient	Comment	The use of 'right place' in this document relates to the needs of the customers/occupants. This can include what's important to them, such as family networks, but it can also include accessibility to shops/services.
Too many affordable homes are planned in Warsash	Objection	The affordable home provision forthcoming in Warsash reflects the location of planned development and the requirements through the planning process.
More use should be made of empty properties	Comment	There are relatively few long-term empty properties in Fareham Borough. Page 8 of the Draft Strategy refers to the fact that fewer than 60 homes have been empty for over 2 years. Many of these will be empty for valid reasons or through the choice of the owner.
Rent levels paid should be based on the total household income and reassessed regularly	Comment	Noted. This is not subject to review through most affordable housing tenancies.
Shared ownership tenure is really just a lease agreement	Comment	Shared ownership houses allow the occupant to purchase the home outright, through staircasing, in

Consultation Statement: Draft Affordable Housing Strategy (September 2019)

		order to potentially hold a freehold title to the property.
Agree with the approach to purchase some private homes for affordable use	Support	Noted.
The Waiting List does not adequately reflect people/families in need	Comment	The Waiting List does reflect the needs of the individual customers and analysis and understanding of the pattern of need (i.e. property size/location) is increasingly reflected in the affordable housing to be provided in the future.
Objective 1 Actions – Object to ‘continue to review, and where appropriate, critically assess any planning proposals where an AH offer is made that does not match our policy and/or local need’. There is no published data on the need by ward to help developers. Where need can change the Council cannot require a developer to rigidly adhere to it. This requirement should be properly taken through a Local Plan Review to be independently assessed. We ask the words “and/or local need” are deleted from the end of this sentence	Objection	The Council’s website has included an overview of the affordable mix of need (i.e. property size mix) by area of the borough since the beginning of 2019. This is reviewed and updated, if appropriate, at least quarterly. This is intended to assist developers as a starting point and developers are encouraged, and welcome, to contact Housing Strategy directly for advice. Current policy requires the affordable provision to reflect local need so requested deletion will not be actioned.
There is no specific Local Plan policy requiring the delivery of Social Rent so this will not be achievable in practice	Comment	The Local Plan policy current requires affordable tenure to reflect the housing needs of the local population. A more specific policy will also be considered as part of the emerging Local Plan.
Objective 1 is good but is not going to succeed / developer should be made to stick to the affordable housing provision agreed	Comment	Noted.
Objective 1 Actions – unclear why Welborne is specifically mentioned	Comment	Welborne is specifically mentioned due to its overall scale and therefore its importance for the future provision of affordable homes.
More explanation is needed for ‘extra large homes’, agree with disabled accessibility as a specific need	Comment	Extra large homes can be larger 4-bed properties that can accommodate families of 8+ people. They are short in supply and typically customers wait longer for such properties as a result. They also cost more to provide.
Objective 2 is vague	Comment	The list of actions to accompany the Objective should provide an indication as to what the Objective is seeking to achieve.
Objective 2 is good, providing it is stuck to	Comment	Noted
Support Objective 2 and the need for a new Allocations Policy	Support	Noted
On Objective 2 Actions – greater clarity needed on valuing partnership with	Comment	This is a broad strategic document. This reference is

Consultation Statement: Draft Affordable Housing Strategy (September 2019)

providers of AH and other related supporting organisations		intended to recognise the potential for partnership working to facilitate additional affordable housing provision. This could be working with another Registered Provider to help deliver a scheme and also valuing supporting organisations such as Two Saints who are involved in homelessness.
Objective 3 needs to be more ambitious / more of the affordable homes should come from the Council	Comment	The Council want and intend to do more but this will be within the parameters of what can be financially achieved.
Support for Objective 3	Support	Noted
Support for Objective 3 – housebuilders make an important contribution to affordable housing delivery	Support	Noted
The Draft Strategy is clear and makes sense	Support	Noted
The Strategy doesn't sufficiently mention/address the homeless	Comment	This is a broad strategy intended to focus on overall affordable housing delivery. Homelessness will be given its own focus through a homelessness strategy which is currently being developed.
It is important that new affordable homes are in accessible locations, such as Fareham Town Centre	Comment	Noted
Strategy has lots of good ideas but do FBC have the resources to deliver it?	Comment	The ideas of the Strategy have had regard to what can be achieved whilst seeking to do more.
Past affordable delivery has been too heavily focused in the western wards	Comment	The affordable home provision delivered and forthcoming in the western wards reflects the location of planned development.
Worrying that so much of the affordable home delivery is reliant on private development/housebuilders	Comment	Noted.
Issues around rent payments to private landlords and ensuring rents are paid (i.e. how benefits are now paid to tenant rather than landlord)	Comment	Noted but a matter outside of the remit for this strategy. National decisions relate to form of benefit payments.
Realistic levels of parking should be provided with new affordable housing	Comment	Noted.
We shouldn't be looking to build more when we can't even maintain our existing	Comment	Noted. We recognise there is a balance between building new and investing in the Council's existing stock.
Matters Relating to increased housing & Other General Comments: -		

Consultation Statement: Draft Affordable Housing Strategy (September 2019)

Appropriate infrastructure and services should be provided to support the additional homes	Comment	Noted
Objections relating to specific Local Plan sites/loss of Strategic Gaps	Objection	Not specifically relevant to the content of the Draft Strategy.
Higher density development is needed to build more and protect the green spaces	Comment	Not specifically relevant to the content of the Draft Strategy.
Higher density development is not appropriate (don't just pack as many into a small space as possible)	Comment	Not specifically relevant to the content of the Draft Strategy.
More homes equals more pollution	Objection	Not specifically relevant to the content of the Draft Strategy.
Too many larger homes are being built in the borough (i.e. 4 and 5 bedroom)	Comment	Noted – not specifically relevant to the content of the Draft Strategy and relates more to private housebuilding
Properties should be freehold	Comment	Not specifically relevant to the content of the Draft Strategy.
New homes should be in the community and not on greenfield sites	Comment	Not specifically relevant to the content of the Draft Strategy.
More 2-bed homes are needed, homes being built are too small	Comment	Noted – not specifically relevant to the content of the Draft Strategy as relates to all new homes delivery.
Brexit will lessen the need for new homes and a housing market crash will make existing homes more affordable	Comment	Noted – It is unclear as to what the full implications of Brexit will be.
Shops should be turned into flats	Comment	Noted – not specifically relevant to the content of the Draft Strategy.
Support for increased amounts of self-build to improve quality/design	Comment	Noted – Actions to Objective 1 do seek to encourage self-build.
Some private rental accommodation in Fareham is sub-standard	Comment	Noted – not specifically relevant to the content of the Draft Strategy.
More homes should be provided to suit older people but not specific communities (i.e. general purpose housing suitable for older people)	Comment	Noted – Page 7 of the Draft Strategy recognises the need for more Older Person affordable housing.
A sustainable population policy is needed	Comment	Noted – not specifically relevant to the content of the Draft Strategy.
Pro-Brexit related comments	Comment	Noted – not specifically relevant to the content of the Draft Strategy.

APPENDIX 2: Tenant Involvement

Tenants' Focus Group

A Tenants Focus Group was held on the 4th July 2019 with 6 tenants in attendance. The Affordable Housing Strategic Lead gave a presentation to provide an overview of the Draft Affordable Housing Strategy and all members of the Focus Group had been provided with a copy of the Draft Strategy in advance. Key comments/questions arising included: -

Q – Instead of saying ‘affordable housing’ can the term instead be ‘social housing’, particularly for the purpose of the draft Strategy?

A – The intention of the Strategy is to provide for all types of affordable housing need. Social housing, or Social Rent, is an important and much needed part of that.

NB: It was clear that the need and provision of Social Rent, the most affordable of affordable housing, is considered to be of high importance.

Q – Do we ensure the infrastructure is in place for people with special needs?

A – This form of housing is normally provided within existing communities/built up areas where the appropriate infrastructure/accessibility is provided. It is an important thing to be considered for individual schemes.

Q – How long are planning applications active for? Does the Council have powers to compel a developer to do something with a site?

A – A full planning permission is typically active for three years. The Council have very limited powers to compel a developer to do something with a site.

Q – Are void (empty affordable) properties turned around quickly?

A – There is less of a focus on a specific timeframe and more about getting it right for the prospective tenant. Prospective tenants are involved in the process from the beginning.

Tenants' Focus Group – Exercise


To help understand differing views/opinions on competing priorities for the delivery of new affordable homes a priorities exercise was undertaken with the group. They were asked, as pairs or individually, to order nine different priorities in terms of what they feel is most, to least, important.

First Group	Second Group
<ul style="list-style-type: none"> • That we build more Council owned stock (rather than relying on Registered Providers to provide more homes) • Building more affordable homes • That we provide more Social Rent homes • That we regenerate our existing stock • That the homes are ‘green’ (i.e. eco-friendly, energy efficient) • Where the affordable homes are built (matching location to where the need is) • That more affordable disabled accessible homes are provided • That we build high quality designed homes • Protecting all the borough’s open space 	<ul style="list-style-type: none"> • That we provide more Social Rent homes • That we build more Council owned stock • That we regenerate our existing stock • That the homes are ‘green’ (i.e. eco-friendly, energy efficient) • Building more affordable homes • Where the affordable homes are built (matching location to where the need is) • That more affordable disabled accessible homes are provided • Protecting all the borough’s open space • That we build high quality designed homes

Consultation Statement: Draft Affordable Housing Strategy (September 2019)

Third Group	Fourth Group
<ul style="list-style-type: none"> • Building more affordable homes • Where the affordable homes are built (matching location to where the need is) • That we build more Council owned stock • That we build high quality designed homes • That we regenerate our existing stock • That we provide more Social Rent homes • That the homes are 'green' (i.e. eco-friendly, energy efficient) • That more affordable disabled accessible homes are provided • Protecting all the borough's open space 	<ul style="list-style-type: none"> • Building more affordable homes • That we provide more Social Rent homes • That we build high quality designed homes • That we regenerate our existing stock • That we build more Council owned stock • That more affordable disabled accessible homes are provided • Protecting all the borough's open space • That the homes are 'green' (i.e. eco-friendly, energy efficient) • Where the affordable homes are built (matching location to where the need is)

For ease of understanding the four groups 'priorities' have been combined using a scored approach to produce an overall ranking. This provides the following most to least important priorities: -

Combined Results (Tenants Focus Group):	Most Important
<ul style="list-style-type: none"> • Building more affordable homes • That we build more Council owned stock • That we provide more Social Rent homes • That we regenerate our existing stock • Where the affordable homes are built (matching location to where the need is) • That the homes are 'green' (i.e. eco-friendly, energy efficient) • That we build high quality designed homes • That more affordable disabled accessible homes are provided • Protecting all the borough's open space 	
	Least Important

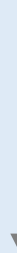
Other feedback by the Focus Group included: -

- The Draft Strategy was interesting and colourful
- Contents of the document were well received

Tenants' and Leaseholders' Forum

A presentation to provide an overview of the Draft Affordable Housing Strategy was given to the Forum at their meeting on the 25th July 2019. Copies of the Draft Strategy and questionnaire were also made available to those attending the meeting to encourage feedback on the evening or subsequently by letter, email or online.

To further engage the residents in the process the priorities exercise was also undertaken. Combining all the individual and group results from that event produced the following overall ranking by the Forum participants: -

Combined Results (Tenants' and Leaseholders' Forum):	Most Important
<ul style="list-style-type: none"> • That we provide more Social Rent homes • That we build more Council owned stock • Building more affordable homes • Where the affordable homes are built (matching location to where the need is) • That we regenerate our existing stock • Protecting all the borough's open space • That we build high quality designed homes • That more affordable disabled accessible homes are provided • That the homes are 'green' (i.e. eco-friendly, energy efficient) 	
	Least Important

Overview

The following provides an overview of key matters arising from tenant and leaseholder involvement (from the Focus Group and Forum Meeting).

- There is a desire for more Council owned stock to be provided and the provision for more Social Rent (the most affordable of affordable homes).
Response: This is reflected in the objectives of the draft Strategy.
- The need for our properties to be 'green' was of moderate importance to the Focus Group and a lesser priority for the Forum.
Response: This was not reflected in the Draft Strategy but an additional action will be included in the final version as it was raised in a number of representations to the document and was considered of some importance by the Focus Group.
- The regeneration of our existing Council stock and where we build the new homes (i.e. matching location to need) is of moderate/high importance for both the Forum and Focus Groups.
Response: This is reflected in the Draft Strategy
- Building high quality designed homes is of moderate/low importance for the Forum and Focus groups – this suggests the priority should be on providing more homes rather than putting additional expense into achieving a high-quality design.
Response: High-quality design has not been specifically sought in the draft Strategy and no amendments will be made. Council home delivery will seek to remain an appropriate balance between design quality and cost.