

Matter 6 Affordable Housing

Issue 10: Does the Plan set out a justified and effective approach to the provision of affordable housing?

I agree with the Inspector that the Affordable Housing delivery figures presented by EBC do not support EBC's assertion that the *provision of affordable homes will be highly restricted* without the contribution from small sites. Indeed, the truth is that the contribution by small sites is **significantly lower** than that presented to the Inspector by EBC in Table 8 of its October 21 report(TOP002):
Update '*Affordable Housing Provision on small sites*.

I believe the contribution from the small sites figure to be at least 38% lower than the **87 Units** claimed as the figure should be **54 Units (7%)** at best and probably around **38**—representing **only 5%** of the Affordable unit delivery total.

I explain below how Table 8 of EBC's report presents an incorrect picture:

Scheme	Units delivered / under construction / released	Total spend from Enabling Fund (actuals)	Average contribution per unit from Enabling Fund
Intermediate affordable – acquisitions (Homeownership Assistance Scheme)	42	£1,523,973	£36,285
Rented affordable provision – acquisitions and new-build	45	£4,074,485	£90,544
Total – additional supply	87	£5,598,458	£64,650

Table 8: Summary of affordable housing delivery supported by financial contributions secured through Elmbridge Borough Council's planning policies (April 2011 to March 2021)

Misleading 'Intermediate Acquisition' data:

The **42** 'intermediate acquisitions' included in Table 8 above are not permanent 'Affordable' properties at all. 42 is essentially, a count of the 'low cost' loans granted to individuals since 2011. However, these are loans to be repaid and by September 2018 about half had done so, with EBC receiving £832,409. As a result, EBC holds no interest in the repaid properties at all and they are now 'free-market' housing. Thus, by September 2018 EBC held an interest in only about **21** units and undoubtedly since 2018 still more loans will have been repaid, reducing the number still further and yet EBC continues to claim the existence of 42 real affordable units as if they currently exist. (data from FOIA 489 18-19 to EBC)

EBC should confirm exactly how many of these 'Intermediate properties' are still in the 'Home ownership Assistance scheme'.

Inflated 'Rented Affordable provision' data:

The **45** 'Rented affordable provision' is presented as if the units are a product of EBC's current 'Affordable Housing' (small sites) contribution policy (CS21). However, the funding and approval for 12 of the 45 rented units claimed by EBC were delivered as a result of the previous National large sites (15+Units) policy, four months before EBC even adopted its 'small sites' policy in August 2011.

In Table 8 (above) EBC has chosen to start the counting from April 2011 rather than the date of its adoption of its current plan on 1/8/2011. By doing this, EBC has increased its delivery figures by including 12 Affordable Units at Imber Place. The decision and allocation of funding was taken in an EBC Cabinet meeting on 30th March 2011. This was 4 months before the adoption of EBC's Development Plan (and policy CS21) on 1st August 2011. The £330K funding was apparently allocated from a £560K fund available at the time from income from the then National policy of charging an affordable contribution on large sites (15 + Units). (Appendix A EBC Cabinet meeting minutes 30-3-2011 -page 25)

Further examination of the application revealed that there were actually only 6 Additional units delivered, not the 12 claimed, as there were already 6 affordable units on the site.

EBC has repeatedly included this misrepresentation in its 2016, 2018 and 2021 Statements to the Planning Inspectorate to justify its policy CS21 at Appeals.

Continued misinformation?

Unfortunately following my Freedom of Information Act (FOIA 436 18-19 - Internal Review) that provided the above information, EBC refuses to release any details of the additional properties that increased its count from 26 to 45 Rented Units. As a result, the properties cannot be identified nor their history, usage and the accuracy of the EBC data checked.

It is questionable as to whether the funds collected through CS21 and units delivered are actually used for 'affordable housing', as EBC has 'first call' on the properties and has sought to

use them to satisfy its own statutory obligation to provide temporary accommodation, as indicated below:

- a) EBC Cabinet approved on 5/7/2017 for £850,000 of 'offsite' monies received through CS21 to be 'loaned' to Crown Simmons. Below is an extract from the Executive summary of the report to EBC Cabinet regarding the proposal:
- b) *".....to support Crown Simmons to acquire five dwellings within Elmbridge for use as affordable housing for an anticipated period of at least fifteen years. It is proposed that the homes would be used as temporary accommodation for homeless households **for whom the Council has a duty to arrange housing.**"* (3rd sentence Executive summary)
- c) And in Section 4 'The Business Case' (para 4.3) states: *".....but **it will also help the Council's financial position too, by reducing use and expenditure on bed and breakfast and other nightly paid accommodation. In 2016/17, the Council's gross expenditure on bed & nightly paid temporary accommodation was nearly £225,000....."*** (Appendix B – EBC Cabinet minutes 5-7-2017 Crown Simmonds)