

East Devon Local Plan Examination Topic Paper

Topic Paper 2 – Affordable Housing

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This topic paper addresses housing matters set out in the East Devon Local Plan as submitted for examination in August 2013.

In a Letter to the Council dated 26 September 2013 the Local Plan Inspector advised:

“I would invite you to consider producing topic papers for housing, affordable housing and employment. It would be useful, in my view, and aid the efficient running of the hearings if the Council could, in these documents draw the different strands of evidence together and explain its position. I am unclear, for example, how the plan aims to address any shortfall in the provision of housing since 2006 and it would assist if you could explain why you consider it appropriate to split the district with regard to calculating a 5 year supply of housing when there is no provision for such an approach in national guidance. An update on the latest position with regard to housing and employment supply would also be useful.”

This topic paper addresses:

- Affordable Housing;

Separate Topic Papers will be produced addressing.

- Housing; and
- Employment.

All documents submitted or presented by East Devon District Council that are relevant to the Local Plan Examination are or will be referred to and will be accessible from links in the East Devon Local Plan Library, at:

<http://www.eastdevon.gov.uk/lplibraryver05.pdf>

Representations submitted on the plan can be viewed through the representation library at:

http://www.eastdevon.gov.uk/plg_lprelibrary4.pdf

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1 Introduction

- 1.1 The East Devon Local Plan was submitted for Examination on 2 August 2013. At the suggestion of the Inspector there was also additional consultation on proposed changes to the plan in the Autumn of 2013.
- 1.2 This paper sets out, in a single report, the key Council evidence for Local Plan affordable housing provision. The report:
 - a) cross-references to the Local Plan Policy and evidence that underpins plan policy,
 - b) cross-references to technical assessment that underpins evidence;
 - c) updates on further/ongoing work; and
 - d) updates on affordable housing supply in East Devon.
- 1.3 This paper should be cross-referenced to Topic Paper 1 which sets out a considerable amount of information on housing provision in general. The bulk of projected future affordable housing delivery in East Devon will come about as a proportion or component of open market development schemes.

2 Affordable Housing Need in East Devon

East Devon Housing Market Assessment

- 2.1 Key evidence on affordable housing need in East Devon is set out in the HMA update report for East Devon that was completed by ORS in August 2011. Local Plan Library reference CD/Hsg020 - See: <http://www.eastdevon.gov.uk/hsg020-strategichousingmarketassessmenteastdevonupdate2011.pdf>
- 2.2 This 2011 report followed on from the initial Exeter and Torbay HMA report that was produced in 2007 and it provides an update on the East Devon housing need position. It should be noted that the 2011 update report came to similar needs conclusions as the 2007 study.
- 2.3 The 2011 study shows, at Paragraph 61 onward, two scenario of affordable housing need for a five year forward looking position, as at 2011, of:

Affordable Housing Type	Five Year Requirement Under Higher Growth Scenario	% Split	Five Year Reqts Under Lower Growth Scenario	% Split
Intermediate Housing	293	25%	188	19%
Social Rented Housing	891	75%	820	81%
Total	1,184	100%	1,008	100%

- 2.4 On the basis of these need figures around 20% to 25% of the affordable housing need is in the intermediate sector (shared ownership and similar products) and around 75% to 80% Social Rented. The 2011 update study was undertaken before the introduction of affordable rent. We have grouped affordable rent and social rent together in plan policy, see Strategy 34 of the Local Plan.
- 2.5 To generate a 20 year affordable housing figure the 1,184 figure can be multiplied by 4 to give a higher level guide of need for around 4,736 affordable homes. It should be stressed that the ORS work did not, by design, cover a 20 year period and there are limitations on how far data can be extrapolated.
- 2.6 A further significant factor is that the ORS work models the need arises from:
- (a) The backlog of need, essentially those in need at the time of assessment; and
 - (b) Newly arising need, those predicted to come into need of affordable housing over the coming years.

2.7 The ORS work at paragraph 59 in the updated report establishes that for two five year time periods (i.e. 10 years looking forward) need calculations incorporate both the above, the product of backlog plus newly arising need. After the 10 year period the backlog element is deemed addressed. Therefore for years 11 to 20 the need calculation is a product of just newly arising need. It is, therefore, not as simple as just multiplying a five year need by four to arrive at a 20 year figure. For this reason the 20 year 4,736 is an over-estimate. Of more significance, however, is that it was informed by assessment based on assumed high in-migration data. Topic Paper 1 on general housing issues prepared by the District Council addresses the issue of changing in-migration in more detail.

Impacts of Lower In-Migration on Affordable Housing Need

2.8 The ORS report notes at Paragraph 66 that need assessment was informed, looking back, over a time of high net in-migration. We can see now, that with lower in-migration, as experienced in reality, the need for affordable housing drops. The table below is extracted from the ORS 2011 update and it elaborates on the information in the previous table.

Figure 15
Summary of 5-Year Housing Requirements for East Devon by Housing Type as In-migration Declines: 2011 (Source: ORS Housing Market Model, Exeter & Torbay Sub-regional Housing Requirement Assessment East Devon Update 2011. Note: Figures may not sum due to rounding)

Housing Type	Gross Housing Requirement	Housing Supply	Net Housing Requirement (Surplus)	
			N	%
5-Year Requirement				
Market Housing	21,035	19,134	1,901	61.6%
Intermediate Housing	2,280	1,987	293	9.5%
Social Housing	4,028	3,137	891	28.9%
Total	27,343	24,258	3,085	100%
5-year Net Requirement (10% lower in-migration)				
Market Housing	20,339	19,134	1,205	54.4%
Intermediate Housing	2,175	1,987	188	8.5%
Social Housing	3,957	3,137	820	37%
Total	26,472	24,258	2,214	100%

2.9 The more realistic pattern of general in-migration into East Devon indicates that the five year need drops down to **1,008 affordable homes. Over 20 years this equates to a figure of 4,032 new** affordable homes. Given the economic climate in recent years a figure of around 4,000 affordable homes is seen as a realistic measure of 20 year need. In fact this figure will be on the high side as it does not take into account the fact that in reality it will be 2 x 1,008 for the first 10 years, to account for meeting a backlog and also newly arising need and then 2 x a figure lower than 1,008 as the backlog component can be discounted (i.e. it will be 2 x newly arising need only).

2.10 Erring on the side of caution, and intentionally accepted a probably degree of over-estimation of need, it is reasonable to work to an up to 4,000 affordable housing need figure.

Local Area Affordable Housing Needs Assessment

- 2.11 The ORS work provides District wide assessment of need but does not look into local area needs. Local area needs assessments, typically undertaken by or in partnership with the Community Council for Devon, establish a local picture of need in terms of dwellings types and sizes that could be applicable for a particular locality.
- 2.12 Some local needs assessment are undertaken at a village level though in other cases a parish wide assessment may be more applicable. As Parishes can be quite small, and suitable sites for development may be limited, the Local Plan, Strategy 35 and preceding reasoned justification, provides for the grouping of Parishes so that needs from a wider area can inform site and delivery choices. Also economies of scale can mean that affordable housing providers require certain minimum size thresholds to be exceeded to make affordable housing provision a financially justifiable proposition.
- 2.13 The table below from the Community Council for Devon - Rural Housing Enablers (RHE) present a picture of past survey work on local (parish or village) affordable needs and also completed homes in East Devon.

East Devon Rural Housing Need and Delivery 2006-2013

Year	Parish Surveys completed	Affordable Need identified	Affordable Homes completed
2006/7	2	32	0*
2007/8	3	49	18*
2008/9	6	94	9
2009/10	4	41	4
2010/11	5	31	45
2011/12	9	122	18
2012/13	3	35	13
Totals	32	404	107

*Years where RHEs only have information about rural affordable housing delivery with which they were involved.

3 Affordable Housing Policy and Viability Evidence

Viability Assessment

- 3.1 To understand more about affordable housing viability the District Council commissioned Roger Tym and Partners and Three Dragons to undertake a viability assessment. Their 2011 report can be seen at:
<http://www.eastdevon.gov.uk/hsg005-strategichousingviabilitystudy2011.pdf>
- 3.2 It is important to note that we commissioned the same consultants to undertake work in respect of CIL viability. The initial affordable housing study establishes viability evidence that justifies affordable housing percentages and thresholds in the local plan. In the CIL viability study cost estimates for sustainable home construction were reduced as policy standards for sustainable construction were lowered and therefore costs lowered. The CIL viability work therefore is more conservative in its assessment and as such indicates greater viability.
- 3.3 Through this follow on work the consultants reviewed affordable housing contributions in the context of CIL viability assessments. The consultants have confirmed that affordable housing policy provision and proposed CIL charging rates for residential development, in combination, are financially sound.
- 3.4 The consultants followed standard practice in assessing viability for affordable housing, consistent with the NPPF, National Planning Practice Guide, Beta version and Viability Testing Local Plans¹ including undertaking a number of case studies. The consultants work highlights a number of key messages, including:
- a) Residual values in East Devon are high. This ensures that we can appropriately seek affordable housing contributions that are in excess of those that might be achieved in other parts of England;
 - b) There is sufficient variation in viability across the district that a single percentage target for affordable housing would not be appropriate;
 - c) In certain parts of the District – notably Rural areas (and especially coastal rural areas) and in the towns of Sidmouth and Budleigh Salterton values are high enough to justify 50% (plus) affordable housing contribution; and
 - d) There are no major cost versus value differences between small schemes (down to one net new dwelling plus) and medium or bigger schemes. This means that it is appropriate to seek affordable housing on sites or as off-site contribution on all schemes of residential development where at least one new unit is created.

¹ Advice for planning practitioners Local Housing Delivery Group Chaired by Sir John Harman June 2012

3.5 These factors all underpin affordable housing policy in the Local Plan.

Local Plan Policy for Affordable Housing

3.6 The housing viability assessment conclusions have been translated into Local Plan policy. The emerging East Devon Local Plan includes policy provision, Strategy 34, for:

- a) 50% affordable housing contribution in higher value areas; and
- b) 25% affordable housing in the less high value areas.

3.7 The less high value areas of East Devon, where 25% affordable housing contribution will be sought, include the towns, and urban extensions to these towns, of:

- Axminster;
- Exmouth
- Honiton;
- Ottery St Mary; and
- Seaton.

The major strategic West End schemes also fall in this 25% policy bracket.

3.9 The viability evidence shows that overall viability does not vary to any significant extent for different schemes sizes. For this reason a policy threshold is set at one net new dwelling upwards for affordable housing contributions to apply.

3.10 Local Plan policy, Strategy 34, seeks a percentage mix of:

- a) 70% Social or affordable rent; and
- b) 30% intermediate.

3.11 This mix falls approximately in line with the percentage split, by property type, established in the needs assessment; the intermediate proportion is marginally higher. By pitching the intermediate element slightly higher than the straight needs percentage split it helps with justifying overall policy levels in viability terms. Intermediate housing requires less subsidy than social or affordable rent and therefore the higher the intermediate percentage (and by implication the lower the social/affordable rent percentage) the higher the overall affordable housing numbers, in viability terms, that can be secured.

3.12 The Local Plan policy makes an appropriate policy compromise to meet all sectors of affordable housing need. Also that policy reflects a broader aspiration to help house working and economically active and younger people that cannot afford to buy a property in the open-market but that seek a financial stake or element of ownership in

their home. Providing opportunities for young people to stay in the District, for example, runs through economic policies of the plan.

4 Past and Projected Future Affordable Housing Delivery

Past Affordable Housing Completions in East Devon

- 4.1 Tabled below is information on past affordable housing completions in East Devon since 2006. The table shows 497 affordable completions across the six years. Of these 5 fall into the affordable by Design category and were granted permission under a PPS3 regime when such provision fell in line with national guidance.

Table of Past Affordable Housing Completions in East Devon

Year	Social Rent	Affordable Rent	Intermediate Rent	Shared Ownership	Inter-mediate	Affordable By Design	First Buy	Total
2006/07	45			15				60
2007/08	25			9				34
2008/09	3			6				9
2009/10	10			4				14
2010/11	94			14				108
2011/12		88	21	39				148
2012/13	32	23		45		5	19	124
Totals	209	111	21	132	0	5	19	497

- 4.2 The new Local Plan sets out what will amount to a step change in affordable housing delivery. This will follow on from a step change on house building in general. A further critical element of the emerging new Local Plan is that it sets a threshold of one net new dwelling at the point at which an affordable housing contribution is sought.

Projected Future Affordable House Building in East Devon

- 4.3 In Housing Topic Paper 1 for Examination details are provided of projected future housing delivery through Local Plan policy, incorporating new allocations and current sites with planning permission and resolutions to grant permission. Counting affordable elements of existing permissions and calculating future projections (applying emerging policy) it shows policy that provides for delivery of an additional 3,695 affordable homes from 1 October 2013 to 31 March 2026. This figure added to the 497 built from 1 April 2006 through to 31 March 2013 gives a total of 4,192 actual and projected affordable houses for the 2006 to 2026 period. This is actually an under-estimate as it does not take into account the six month period of 1 April 2013 to 30 September 2013. During this six month period Cranbrook will have seen around 70 plus affordable dwellings built and based on past trends (and excluding Cranbrook affordable completions) an additional estimated further 30 completions are likely to have been built. Therefore an additional 100 can be added to the 4,192 to give a total of 4,292 (or around 4,300).

4.4 The table below/over sets out more details of the geographic spread of projected affordable housing development and also annual projected completions. The table has been created by applying new Local Plan affordable housing policy to sites/provision projected to come forward through the plan and also adding in projected delivery from sites already with permissions.

Settlement (as defined by Built-up Area Boundaries)	Combined projected AH completions (with permission, acknowledged development potential and allocated)															TOTAL projected Oct 2013 - Mar 2026
	Oct 2013 - Mar 2014	2014 - 15	2015 - 16	2016 - 17	2017-18	April 2018 - Sept 2018	Oct 2018 - March 2019	2019 - 20	2020 - 21	2021 - 22	2022 - 23	April 2023 - Sept 2023	Oct 2023 - March 2024	2024 - 25	2025 - 26	
East Devon's West End - Totals	154	225	243	248	213	102	79	128	169	169	152	71	71	142	134	2298
Cranbrook	146	198	190	187	187	95	46	76	117	117	117	59	58	117	116	1824
Pinhoe	8	24	40	48	12	0	13	25	25	25	25	13	13	25	18	312
North of Blackhorse	0	3	14	14	14	7	20	27	27	27	10	0	0	0	0	162
Towns - Totals	36	98	139	92	55	32	77	117	109	90	75	34	29	29	0	1012
Axminster	31	43	55	27	16	8	23	45	45	45	45	23	23	28	0	457
Budleigh Salterton	2	14	22	11	0	0	0	0	0	0	0	0	0	0	0	49
Exmouth	3	24	27	18	13	7	14	32	32	25	25	11	6	0	0	237
Honiton	0	0	0	0	0	0	3	6	13	13	3	0	0	0	0	38
Ottery St Mary	0	12	25	25	25	17	24	17	0	0	0	0	0	0	0	144
Seaton	0	0	1	1	1	1	1	1	14	8	1	1	1	1	0	31
Sidmouth	0	5	8	9	0	0	12	17	7	0	0	0	0	0	0	67
Villages With BUABs - Totals	2	67	73	32	28	10	10	20	20	20	20	10	10	20	0	344
Alfington	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Awliscombe	0	0	1	1	1	1	1	1	1	1	1	1	1	1	1	10
Axmouth	0	0	1	1	1	0	0	1	1	1	1	0	0	1	0	5
Aylesbeare	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Beer	0	0	2	2	2	1	1	2	2	2	2	1	1	2	0	17
Bramford Speke	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Branscombe	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Broadclyst	0	0	1	1	1	0	0	1	1	1	1	0	0	1	0	9
Broadhembury	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Charstock	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Clyst Hydon	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Clyst St George	0	0	1	1	1	1	1	1	1	1	1	1	1	1	1	13
Clyst St Mary	0	5	10	10	7	0	0	0	0	0	0	0	0	0	0	32
Colston Raleigh	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Colyford	0	0	1	1	1	0	0	1	1	1	1	0	0	1	0	5
Colyton	0	0	2	2	2	1	1	2	2	2	2	1	1	2	0	18
Dunkeswell	0	0	1	1	1	1	1	1	1	1	1	1	1	1	1	11
Dunkeswell (Highfold)	0	12	2	0	0	0	0	0	0	0	0	0	0	0	0	14
East Budleigh	0	0	1	1	1	0	0	1	1	1	1	0	0	1	0	8
Ebford	0	0	1	1	1	1	1	1	1	1	1	1	1	1	0	13
Feniton	2	8	10	0	0	0	0	0	0	0	0	0	0	0	0	20
Hawkchurch	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Kilmington	0	0	1	1	1	0	0	1	1	1	1	0	0	1	0	8
Lymington	0	8	3	1	1	0	0	1	1	1	1	0	0	1	0	16
Membury	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Musbury	0	0	1	1	1	0	0	1	1	1	1	0	0	1	0	5
Newton Popleford	0	5	10	1	0	0	0	0	0	0	0	0	0	0	0	16
Otwell	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Otterton	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Payhembury	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Plymtree	0	0	1	1	1	0	0	1	1	1	1	0	0	1	0	8
Rockbeare	0	0	1	1	1	0	0	1	1	1	1	0	0	1	0	5
Sidbury	0	0	1	1	1	0	0	1	1	1	1	0	0	1	0	8
Smallridge	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Stockland	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
Talton	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Tipton St John	0	8	2	0	0	0	0	0	0	0	0	0	0	0	0	10
Uplyme	0	0	1	1	1	1	1	1	1	1	1	1	1	1	0	10
Upottery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3
West Hill	0	0	2	2	2	1	1	2	2	2	2	1	1	2	0	18
Whimple	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	5
Woodbury	0	19	16	0	0	0	0	0	0	0	0	0	0	0	0	35
Woodbury Salterton	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rural Areas/Small Villages Without BUABs	0	37	2	0	0	0	0	0	0	0	0	0	0	0	0	42
Villages and Rural Areas Total	2	104	75	32	28	10	10	21	21	21	21	10	10	21	0	388
Grand Totals	193	427	456	371	296	144	168	265	299	279	247	116	110	192	134	3695

- 4.5 The 4,300 affordable home figure has scope to be added to through additional provision detailed in section 6 of this paper.

Affordable Housing at Cranbrook

- 4.6 At Cranbrook the first phase of development is for 1,100 homes. 10% of these are available on the open market as 'Affordable by Design'. Whilst this category of affordable housing would not fall within a National Planning Policy Framework definition it did comply with Planning Policy Statement 3 affordable housing definitions when the former Government policy was applicable and agreements were signed. This sector of provision will provide for some in need of affordable housing.
- 4.7 Agreements in place set out that of the total 1,000 new homes being built 30% will be intermediate or social rent affordable, i.e. 300 will fall into this category. Agreements also provide for East Devon District Council to have nomination rights for 65% of these 300 new affordable homes (i.e. 195 homes) and Exeter City to have nomination, from their lists, of 35% of the homes (i.e. 105 homes).

5 Affordable Housing Distribution

- 5.1 Looking forward over the period from 2014 to 2026 the greatest proportion of affordable housing in East Devon will be in the West End of the District. The large table in section 4 of this paper emphasises this point. Of the additional District wide 3,695 dwellings a figure of 2,296 are projected to be in the West End. This amounts to around 62% of the provision. On the basis that the spatial distribution strategy of the Local Plan, which is informed by and applies strategic policy and approach set out in earlier plans, accommodates a large part of future development at the West End there is an inevitability that a large part of the affordable housing will be in this area.
- 5.2 More on overall plan strategy for housing distribution is set out the Housing Topic Paper – Number 1 and will be presented as evidence to the Hearing Session 3 on Housing. In broad terms the West End of East Devon will be a focal point for growth and it is a location where substantial job growth, including in professional sectors, will be accommodated. There is, therefore, a natural link between areas of high job growth and those where housing in general and affordable housing will be located.
- 5.3 Furthermore we recognise that a large proportion of those needing affordable housing are in the younger age group and many will have younger children. A distinct attraction of a West End concentration of affordable housing development is that the major sites being built, and this is specifically the case at Cranbrook, will provide new schools and other facilities that are particularly attractive to younger families.

6 Additional Sources of Affordable Housing Delivery

- 6.1 Over and above the housing development that the plan explicitly plans for or that is projected to come forward from conservative estimates of windfalls there are two additional sources of affordable housing supply that are highlighted:
- a) Exceptions site affordable housing;
 - b) East Devon District Council investment in Affordable Housing

'Exceptions' Site Affordable Housing

- 6.2 Local Plan policy Strategy 35 allows for mixed market and affordable housing developments outside of Built-up Area boundaries where residential development would not normally be permitted - helping to make provision for affordable housing in rural settlements where there is an identified need. The District Council introduced this policy approach ahead of it being established through the National Planning Policy Framework. It follows on from established practice for 100% 'exceptions site' affordable housing policy. With the erosion of public subsidy to support affordable housing provision there has been an inevitable shift towards open market dwellings subsidising affordable provision.
- 6.3 Strategy 35 allows for schemes of up to 15 dwellings in total that comprise at least 66% affordable housing. Such schemes will need to be supported by evidence of affordable need and at rural settlements. Plan policy can allow for development, recognising the importance of affordable housing, We have not included predictions of numbers of future affordable houses and open market houses that may be built through this policy. They would though be expected to be over and above those that are reported in this topic paper (they would also be over and above those referred to in the Topic Paper 1 on general housing matters and would add to total windfall provision). It is not known how many houses this policy may deliver may be one or two schemes per year (though perhaps more).
- 6.4 Viability assessment indicates that the value of open market housing in rural East Devon is such that land owners and developers will typically make a profit on these schemes in the absence of public subsidy. Returns for land owners can typically be expected to be some way in excess of agricultural land values and typically alternative use (noting planning constraints on alternative uses).

East Devon District Council Investment in Affordable Housing

- 6.5 The District Council is increasingly looking at scope to build new Council houses. With lessening of financial and other constraints on new Council house development this is an option for the Council to consider in future years. In very recent years the Council has built /acquired new houses, the first for many years. To avoid double counting of schemes there is no provision built in to the assessment of houses that may come through from this source. However, it is a possible source of future affordable housing (and housing in general) supply that could add to those already projected to come forward.