

OVERVIEW & SCRUTINY

Torbay's Housing Crisis Review Panel

Members

Councillors Foster (Chairwoman), Barnby, Brown, Mandy Darling, Douglas-Dunbar, Johns, Kennedy and O'Dwyer
External Advisors Alistair Allender, Stuart Bakewell and Tom Godwin

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A meeting of **Torbay's Housing Crisis Review Panel** will be held on
Wednesday, 15 December 2021 commencing at **2.00 pm**

The meeting will be held remotely via Zoom (the links to the meeting are set out below)

Join Zoom Meeting

<https://us02web.zoom.us/j/87288401669?pwd=RUpyeWlDd2ZPWUFmSjhkem41QWRmUT09>

Meeting ID: 872 8840 1669

Passcode: 476100

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Agenda

1. **Apologies**
To receive apologies for absence, including notifications of any changes to the membership of the Panel.
2. **Declarations of Interest**
 - a) To receive declarations of non pecuniary interests in respect of items on this agenda

For reference: Having declared their non pecuniary interest members may remain in the meeting and speak and, vote on the matter in question. A completed disclosure of interests form should be returned to the Clerk before the conclusion of the meeting.
 - b) To receive declarations of disclosable pecuniary interests in respect of items on this agenda

For reference: Where a Member has a disclosable pecuniary interest he/she must leave the meeting during consideration of the

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item. However, the Member may remain in the meeting to make representations, answer questions or give evidence if the public have a right to do so, but having done so the Member must then immediately leave the meeting, may not vote and must not improperly seek to influence the outcome of the matter. A completed disclosure of interests form should be returned to the Clerk before the conclusion of the meeting.

(Please Note: If Members and Officers wish to seek advice on any potential interests they may have, they should contact Governance Support or Legal Services prior to the meeting.)

3. **Update on housing supply and predicted future need within Torbay**

(Pages 5 - 37)

Following initial discussion on 23 November 2021, the focus for this meeting will be to discuss the responses to the key lines of enquiry contained within the submitted paperwork in connection with housing supply and predicted future need within Torbay.

Supporting documents:

1. Key lines of enquiry and responses – please note that this document contains a number of links to further information and useful background documents;
2. Data – Empty Properties and Second Homes; and
3. Representation by member of the Public.
4. Presentation – outlined at the meeting on 23 November 2021 (for reference purposes).

The Divisional Director of Planning, Housing and Climate Emergency, David Edmondson and the Divisional Director of Community and Customer Services, Tara Harris are leading on the discussions.

Instructions for the press and public for joining the meeting

If you are using an iPad you will need to install Zoom which can be found in the App Store. You do not need to register for an account just install the software. You only need to install the software once. For other devices you should just be taken direct to the meeting.

Joining a meeting

Click on the link provided on the agenda above and follow the instructions on screen. If you are using a telephone, dial the Zoom number provided above and follow the instructions. **(Note:** if you are using a landline the call will cost up to 13p per minute and from a mobile between 3p and 55p if the number is not covered by your inclusive minutes.)

You will be placed in a waiting room, when the meeting starts the meeting Host will admit you. Please note if there are technical issues this might not be at the start time given on the agenda.

Upon entry you will be muted and your video switched off so that only the meeting participants can be seen. When you join the meeting the Host will unmute your microphone, ask you to confirm your name and

update your name as either public or press. Select gallery view if you want see all the participants.

If you have joined the meeting via telephone, your telephone number will appear on screen and will be displayed for all to see until the Host has confirmed your name and then they will rename your telephone number to either public or press.

Speaking at a Meeting

If you are registered to speak at the meeting and when it is your turn to address the Meeting, the Chairman will invite you to speak giving the Host the instruction to unmute your microphone and switch your video on (where appropriate) therefore please pause for a couple of seconds to ensure your microphone is on.

Upon the conclusion of your speech/time limit, the Host will mute your microphone and turn off your video.

Meeting Etiquette for Registered Speakers – things to consider when speaking at public meetings on video:

- Background – the meeting is public and people will be able to see what is behind you therefore consider what you will have on display behind you.
- Camera angle – sit front on, upright with the device in front of you.
- Who else is in the room – make sure you are in a position where nobody will enter the camera shot who doesn't want to appear in the public meeting.
- Background noise – try where possible to minimise background noise.
- Aim to join the meeting 15 minutes before it is due to start.

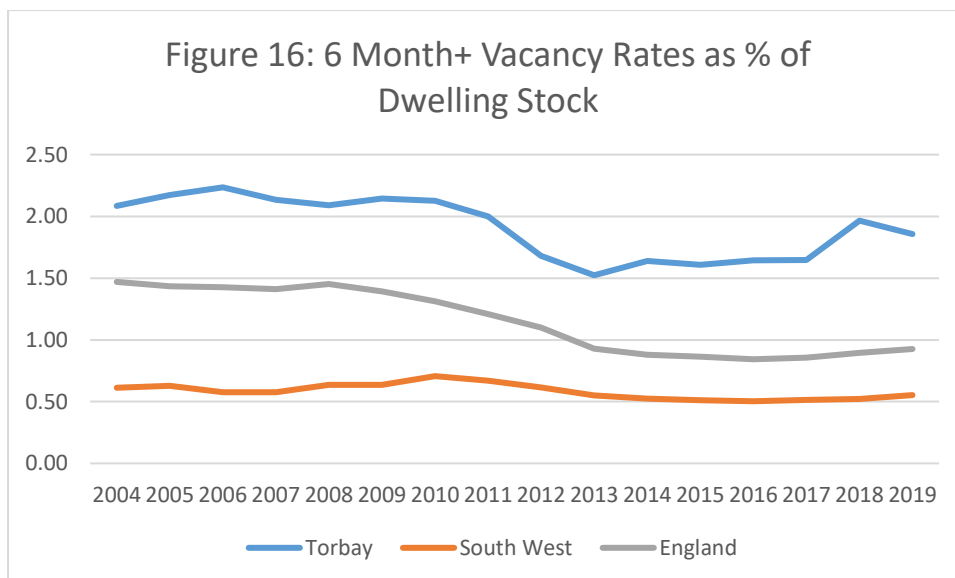
Key Lines of Enquiry and Responses

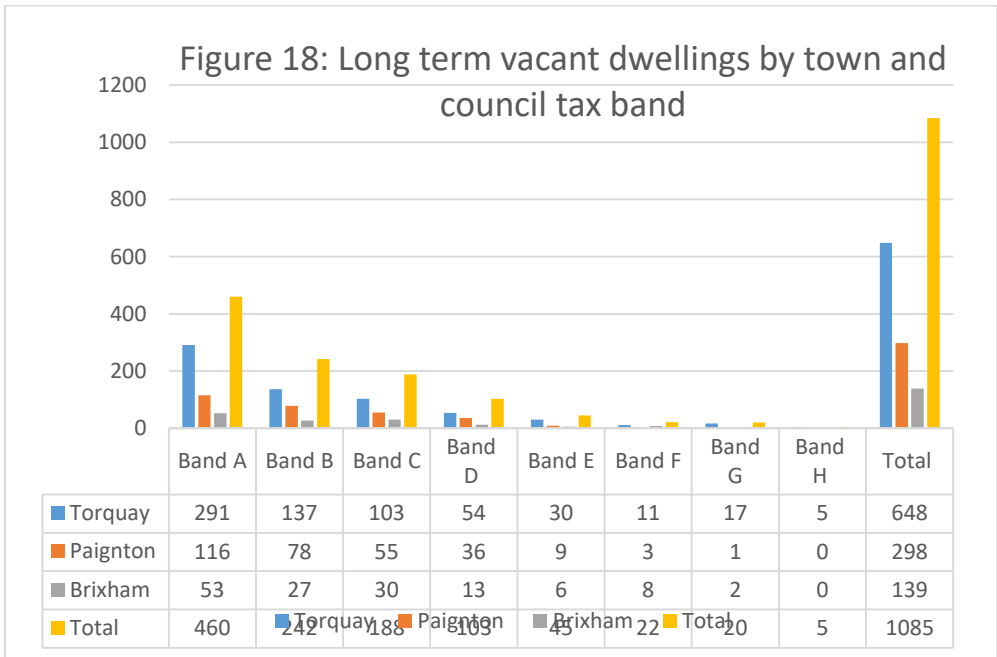
- How many properties are empty or have been empty for longer than six months in Torbay? What is being done to bring empty properties back into use, including grants and organisations available to assist homeowners?

See figures 16-18 (p21 et seq.) of the Housing Delivery Test Action Plan 2021 [Evidence Base and Monitoring - Torbay Council](#)

Torbay has had higher than national rate of vacant properties since the early 2000s (at least). At April 2021 there were 1085 properties that had been vacant for 6 months or longer. This is 2% of the housing stock: compared with a national rate of about 1% long term vacancy. A high proportion of 6+ month vacant dwellings are small apartments (Council tax band A-B) and there is roughly a 40% churn in the 6+ Month vacant stock each year: so in the main the same properties are not vacant in the very long term (longer than 5 years).

This may point to sluggish demand for apartments and a high level of poor quality accommodation.





- What action is being taken to monitor second homes which are empty and not being used? Are there any policy decisions that could be taken to reduce the number of second homes, taking into account that Torbay is a tourism destination?

This is something for Council Tax to comment on, but it appears that some of the above higher council tax band “vacant” properties are second homes (or buy to leave investments).

Whilst second home ownership is higher in Torbay (2.3) than in England and Wales (1.2%), it is lower than other Tourism “hotspots” e.g. Cornwall 5%, South Hams 8.3%, North Devon 3.9% [House prices in tourist hotspots increasingly out of reach for young and low paid - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/articles/economy/housing-market/house-prices-in-tourist-hotspots-increasingly-out-of-reach-for-young-and-low-paid)

ONS data suggests a boom in second homes being let as holiday lets during the Covid pandemic. The rise of “AirB&B” and similar platforms will also affect genuine holiday businesses.

- How is the planning system being utilised to bring forward suitable housing e.g. larger family homes, single units, units for care experienced young people or units assist adults to live independently, people with a disability? How are funds such as Disabled Facilities Grants and the Better Care Fund being used to help with suitable adaptations?

This is quite a wide question.

Policy SS11.13 resists the conversion of modest size houses to small flats or HMOs in area of deprivation.

Policy DE3 “Development Amenity” seeks to provide aa good standard of accommodation. It is regularly supported at appeal despite the operation of the Presumption.

Policy H6 “Housing for People in Need of Care” seeks to reduce the number of converted Class C2 care homes and encourage greater living at home and a range of supported specialist housing products.

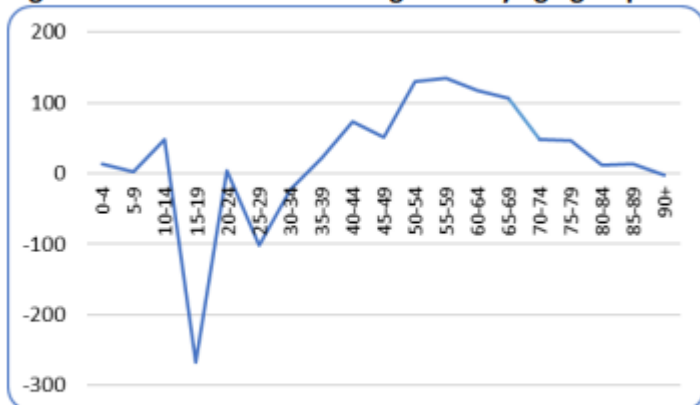
Note that there is a policy dilemma in that Torbay’s population growth is entirely driven by net inwards migration of older people. Whilst the needs of older age groups need to be met (and

can free up family housing) the cost of providing for older people will be a very heavy burden on Torbay in the future. There is a need to seek to rebalance the local housing market.

The most recent population profile for Torbay and its implications for older age groups is available at:

http://southdevonandtorbay.info/media/1282/population_torbay_2021.pdf

Fig 3: Estimated net internal migration by age group



Source: Office for National Statistics internal migration estimates, 2020. Estimates may have been affected by the pandemic as movement may not have been accompanied by timely updates to the administrative data used to produce the estimates

- How many potential homes are there in Torbay with Planning permission that have not yet been built and what is the reason for this?

The April 2021 Housing Monitor indicates 1373 dwellings with planning permission that have not been started, and a further 494 dwellings under construction at 1st April 2021

See Section 3 of the HDTAP for reasons why sites have not been built out. Reasons considered are: development scepticism, environmental constraints, supply shortages (Brexit and Covid), lack of demand and over supply of apartments, a significant amount of allocations being on regeneration sites with complex site assembly issues.

- How many potential brown field sites are identified within the Local Plan or Neighbourhood Plans that have not been brought forward for development. What are the reasons for this and what incentives could be used to encourage developers to bring forward development on these sites?

Section 3 of the 2021 HDTAP

As a rough indicator, over 5,000 of the 8,900 dwellings identified in the Adopted Local Plan 2012-30 (Adopted 2015) are on sites that are likely to yield apartments.

Un- built permissions

3.12 At April 2021 there were 1,373 dwellings with planning permission and 494 dwellings under construction. In addition to these, there was capacity for approximately 2,100 dwellings on non-started sites allocated for development in the Local or Neighbourhood Plans, the main sites being:

- Torquay Gateway (circa 550 dwellings, Adopted Masterplan SPD)
- Collaton St Mary. Paignton (Circa 460 dwellings, Adopted Masterplan SPD)

- Great Parks Phase 2, Paignton (circa 400 dwelling, planning brief)
- Hollicombe Former Gas Works, Preston (185 apartments with planning permission granted in 2007)
- Council Regeneration sites in all three town centres.

3.13 The Council's measures to deliver the remaining allocated sites is set out in part 4. It is worth noting that Great Parks Phase 2, Hollicombe and the town centre sites were all allocated in the former Local Plan which was adopted in 2004.

Figure 10: Number of Dwellings with Planning Permission or Allocated in the Development Plan, 2021.

	No. of dwellings with planning permission on not started sites	No. of homes not started on sites that have been commenced.	Dwellings under construction at 31/03/21	Dwellings completed 2020/21
Torquay	234	280	299	104
Paignton	522	290	146	130
Brixham Peninsula	25	22	49	3
Total	781	592	494	237

Source: Torbay Council Housing Monitor and HELAA

- Are there any charges that could be put on land which has planning permission and is not being developed within a specified period e.g. 2 years?

The LPA could impose shorter time period for commencement of planning permissions and there is general advice to minimise the use of pre-commencement conditions.

However, charging developers for unbuilt out planning permissions would probably require new government legislation. (Specifically it would probably be unlawful under Regulation 122 of the CIL Regulations if such charges were imposed as a planning contribution).

- How does the outcome of the HELAA and HENA contribute towards bringing forward more affordable houses?

The HELAA (Housing and economic Land Availability Assessment) provides advice about the suitability, availability and achievability of potential housing land. Whilst it may identify new sites, it does not make planning policy- but rather informs the Local Plan Review.

There is nothing to stop the Council/TorVista or partner RPs making planning applications outside of the Local Plan process, and benefitting from the Presumption in Favour of Sustainable Development. It is likely that urban sites, including re-use of car parks and other regeneration opportunities are the best options for this. Work is under way with Alistair Allender to identify potential sites.

The HENA (Housing and Economic Needs Assessment) provides housing market intelligence about the need for different types of affordable and other specialist housing. The HENA is useful for policy making. Without up to date evidence that there is an affordable housing need, it would be more difficult to justify seeking affordable housing through S106 Obligations on new housing development (although the need for affordable housing is rarely challenged by housebuilders these days- the challenge is usually on viability grounds).

The HENA is available in draft form and should be finalised by the end of November, following peer review. The HENA identifies a gross annual need for 575 affordable rented homes per year. On average there are 282 relets per year; which results in a need for around 293 affordable homes for rent per year. (Which equates to about 237 dwellings a year above current delivery). The interim findings suggest an annual shortfall of 72 intermediate affordable homes per year. This brings the overall affordable housing need (which is a different concept to the Standard Method need) to about 309 dwellings per year.

It will be noted that the HENA figure is lower than the 2011 Strategic Housing Market Assessment (SHMA) which assessed a need for around 500 affordable homes a year. This is because of different assumptions (the 2021 HENA allows 10 years to clear the backlog of need, and that a higher proportion of incomes can be spent on housing costs).

- Have there been any recent help to buy schemes and what is being done to encourage similar schemes, particularly to help younger people onto the property ladder?

We don't monitor this. Not sure if publicly available at local level – we may have to approach the building industry. Anecdotally, a lot of the new housing on the Western Corridor built in the last decade has been bought by Help to Buy – and has been a contributing factor to increased birth rates from younger people getting on the housing ladder.

- What is being done to work with our neighbouring local authorities to help increase local housing supply?

Paragraphs 24-27 of the NPPF set out “Maintaining Effective Cooperation” and require LPAs to prepare statements of common ground to address cross boundary issues and cooperate on them. Paragraph 61 of the NPPF requires that *“In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”*.

Torbay has generally been considered to be a relatively self contained Housing Market Area (HMA), according to the assessment in the (then) Exeter and Torbay Strategic Housing Market Assessment (SHMA). All the time that Torbay considered that it could meet its own needs internally, there was little mileage in challenging the assumption that the HMA largely corresponded to the UA boundaries. However, given the high level of outwards commuting from Torbay to the Greater Exeter HMA and Functional Economic Market Area (FEMA), and significant retail, educational and healthcare functional links, it may be worth reassessing this.

Torbay is bordered by two housing market areas (HMAs). To the north is the Greater Exeter HMA comprising Exeter, Teignbridge, East Devon and Mid Devon. Torbay's functional relationship with the Greater Exeter Area is strong (see TTWA data below). There has been contact at officer level with the former GESP authorities to identify that Torbay was likely to be unable to meet its housing needs.

Torbay: Main travel to work relationships (2011 census).

Torbay: Travel to work areas (2011 census).			
	Inward	Outward	Net (negative indicates outward commuting flow)
Torbay	8,591	12,977	-4,386
Torbay-Teignbridge	4,736	5,192	-456
Torbay- Exeter	385	2,127	- 1,742
Torbay-Plymouth	675	784	-109
Torbay- South Hams	1,986	2,668	-772

In April 2018 I wrote to the GESP authorities to set out that there is likely to be a shortfall in Torbay's ability to meet its needs post 2030. A shortfall of 2-3,000 dwellings was seen as most likely.

The former Greater Exeter Strategic Plan (GESP) has been abandoned, and each area is preparing its own Plan. (Subject to the Duty to Cooperate). Torbay has made representations to Teignbridge and East Devon, on their Regulation 18 Local Plan consultations that it will need assistance in meeting its housing numbers. Teignbridge is the closest neighbour and officer discussions are ongoing with TDC. Torbay Council's representations on the Teignbridge Local Plan Review on 9 August 2021 states:

"As Torbay officers have previously set out, Torbay is currently updating its Local Plan Housing Policies, with a view to seeing whether the Torbay Local Plan housing requirement/Standard Method need calculation is achievable by 2030. Both of these calculations would (coincidentally) require the creation of about 6,000 new dwellings in Torbay between 2020-30. Given that Torbay's long term housing completions rate since 1980 is about 430 dwellings a year, and the level of environmental constraints on remaining land, this figure will be extremely challenging. As you are aware, Torbay is currently carrying out a Housing Land Availability Assessment (HELAA) and the initial finding from this should be available in September. It would be useful for Torbay to have a further Duty to Cooperate/SOCG meeting with Teignbridge and other neighbouring authorities at that time to discuss our positions in more detail. However, without prejudice, it seems very likely to me that Torbay will be unable to meet the Standard Method level of housing need and will have to ask neighbours to seek to accommodate some of our needs as set out in paragraph 61 of the 2021 NPPF.

We note that Chapter 4 "Heart of Teignbridge" includes sites in the Kingskerswell area, particularly 2 Fluder Farm, Torbay Fringe and 3 Vinegrove, Torbay Fringe. We appreciate that these site will need careful assessment as to their landscape and ecological impacts. The maintenance of a strategic gap between Torbay and Kingskerswell is a longstanding policy objective for both Torbay's and Teignbridge's local plans. However, these are in an area that was classified as being within the Torbay housing market area in the 2007 SHMA and development of the sites would clearly help meet the above identified strategic need."

Note that both councils are exploring opportunities in the land between Kingskerswell and Torquay (which are in the Torquay HMA).

There is ongoing discussions between Torbay and Teignbridge on the Duty to Cooperate.

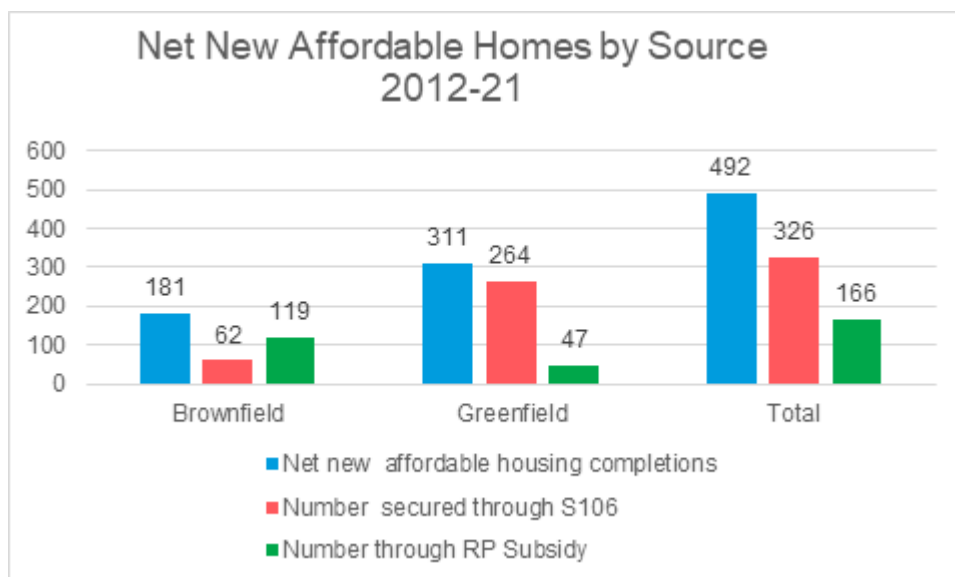
- How many affordable homes have been built since the last Local Plan?

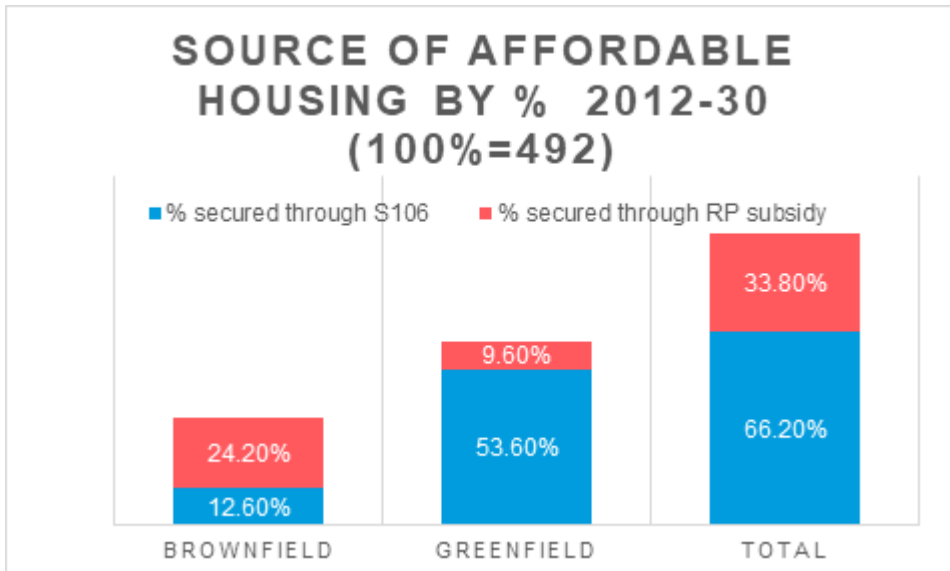
Note that different data sources have different figures for affordable housing numbers. The following are from the Council's housing Monitor and the TDA.

Over the 9 year period since 2012 there were 492 net affordable homes built. An additional 23 homes were provided by purchasing existing dwellings, bringing the total number of new affordable homes to 523. (These used to be called "Existing Satisfactory Purchases". They are not new dwellings and so not included in the analysis below). For completeness the gross number of affordable dwellings created was 597, as some of the RP developments came from redeveloping existing affordable housing areas e.g. at Hayes Road, Paignton.

Of the 492 net new affordable housing completions, 311 were from greenfield sites and 181 from brownfield sites (63% greenfield to 37% brownfield). 326 (66.2%) affordable homes were delivered through the planning system (i.e. via S106 agreement required by Policy H2 of the Local Plan and its predecessor). Of these S106 dwellings, 264 were on greenfield sites and 62 on brownfield sites (the largest brownfield S106 sites being former holiday camps at Marine Park, Paignton and Wall Park, Brixham). In other words, S106 brownfield sites achieved 12.6% of affordable housing supply; whereas greenfield s106 sites achieved 53% of supply.

The remaining 166 dwellings (33.8%) were secured via Registered Providers/TDA providing in excess of the S106 requirement. Of these "RP" sites 119 were on brownfield sites, the largest number coming from the redevelopment of Hayes Road, Paignton. The Beechfield development on (greenfield) council land at Scotts Bridge, Torquay delivered 90 affordable homes overall, which is 47 more than would have been achieved through S106 requirements on the site.





Affordable Housing site completions NET 2012-21

2012/13	Scheme	#'s	Planning s106
	Torre Marine, Torquay	10	10
	Watcombe (Helensmead Close – existing dwellings)	2	
	Beechfield Ave, Torquay	12	12
	Torquay Boys Grammar School site	4	4
2013/14	Scheme	#'s	
	Smallcombe, Paignton	13	
	Langridge Rd, Paignton	10	
	Beechfield Ave, Torquay	90	43
	Hayes Rd, Paignton	0	
	Southview Rd, Paignton	4	
2014/15	Scheme	#'s	
	Hayes Rd, Paignton	73	
	Preston Down Rd, Paignton	12	
2015/16	Scheme	#'s	
	Yannons Farm, Paignton	8	8
	Elberry Gardens, Paignton	10	10
	White Rock, Paignton	8	8
	Marine Park, Paignton	20	20

2016/17	Scheme	#'s	
	Wall Park, Brixham	16	16
	White Rock, Paignton	11	11
	Yannons Farm, Paignton	10	10
2017/18	Scheme	#'s	
	Yannons Farm, Paignton	4	4
	Primrose Hill, Torquay	18	18
	Wall Park, Brixham	4	4
2018/19	Scheme	#'s	
	Wall Park, Brixham	6	6
	Primrose Hill, Torquay	30	30
	Alfriston Rd, Paignton	24	24
	White Rock, Paignton	26	26
	Yannons Farm, Paignton	5	5
2019/20	Scheme	#'s	
	Bishops Place, Paignton	7	
	White Rock, Paignton	33	33
	Yannons Farm, Paignton	5	5
2020/21	Scheme	#'s	
	Bishops Place, Paignton	6	6
	White Rock, Paignton	7	7
	Luscombe Lane, Paignton	6	6
	Next steps (various off the shelf purchases Torquay & Paignton)	21	

515

326

		12/13	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	
TQY	Bf	10	0	0	0	0	0	0	0	0	10
	Gf	16	90	0	0	0	18	30	0	0	154
PTN	Bf	0	27	85	20	0	0	0	7	6	145
	Gf	0	0	0	26	21	4	55	38	13	157
BXM	Bf	0	0	0	0	16	4	6	0	0	26
	Gf	0	0	0	0	0	0	0	0	0	0
NB. These figures do not include the 23 off the shelf purchases (i.e. not via the planning system)											

Bf	181	37%
Gf	311	63%
Total	492	

- What was the affordable homes need at the start of the current Local Plan period?

See above- 500 dwellings per year according to the 2007 and 2011 SHMA. But the methodology has changed between the SHMA (500) and the HENA (309) so they are not comparable. Over the decade 2011-21 House prices have risen in real terms and incomes have fallen in real terms, so the level of need for affordable housing is likely to have risen. [shmatorbayupdate.pdf](#)

- How much land is there left which is physically available for housing across Torbay including the number of housing this land can provide? How many of these are predicted as affordable?

This is a matter for the HELAA. Torbay is about 60% urbanised. Torbay has a land area of 62.9 sq km; so roughly 25 sq km is undeveloped. However not all of this land is suitable for development. Around a quarter of the countryside area is AONB and 40% is undeveloped coast. Other areas are within flood risk areas. There is significant ecological importance with greater horsehoe bat flight paths and landscape connectivity zones. Most agricultural land isw habitat for cirl buntings.

The HELAA assesses that the stock of housing land (which includes urban as well as rural sites) is broadly as follows:

Sites with permission or allocated in the development plan	1740 dwellings
Sites with minor constraints	1730 dwellings
Sites with significant constraints (e.g. AONB, Undeveloped Coast, close to SAC)	3940 dwellings

In addition, a significant proportion of Torbay’s housing comes from windfall sites

Members have not asked Officers to update Policy H2 of the Local Plan which sets out affordable housing requirements. Therefore affordable housing is sought on the basis of:

Brownfield sites of 15-19 net new dwellings:	15%
Brownfield sites of 20+ net new dwellings:	20%
Greenfield sites of 15-29 net new dwellings:	25%
Greenfield sites of 30+ net new dwellings:	30%

- What action is being taken to encourage more development of brownfield and stalled sites to bring forward new housing.

There is a Principal Officer appointed to help implement regeneration schemes. Development management have a pre-application advice service.

The Housing Delivery Test Action Plan Sections 3- 5 describes measures to boost housing supply. Section 5 looks at specific sites and progress on them. [Evidence Base and Monitoring - Torbay Council](#)

- How much Section 106 money and Housing Grant Fund is in the pot for affordable housing and how much do we anticipate we need going forward?

The current figure in the pot for affordable housing is £657,000 and is made up of right to buy receipts and any commuted sum receipts via S106 agreements.

The Council's infrastructure Funding Statement for 2020 is at: [finaltorbayifs23dec2020.pdf](#) Unfortunately, it doesn't provide a breakdown for affordable housing – although most affordable housing S106 require on-site provision. At page 12 the IFS indicates that £11,489 of S106 receipts were spent on housing in 2019/20. This is a relatively small amount and would not even amount to the commuted sum sought for 1 affordable dwelling.

3.4. Headline Figures

Monetary Contributions

Total money to be provided ¹⁶ through planning obligations agreed in 2019/20	£5,330,631.77 ¹⁷
Total money received ¹⁸ through planning obligations (whenever agreed) in 2019/20	£608,393.87
Total money , received through planning obligations (whenever agreed), spent ¹⁹ in 2019/20	£1,549,291.15
Total money , received through planning obligations (whenever agreed), retained ²⁰ at the end of 2019/20 (excluding "commuted sums" for longer term maintenance).	£3,260,920.76
Total money , received through planning obligations (whenever agreed), retained at the end of 2019/20 as "commuted sums" for longer term maintenance.	£0 ²¹

How much funding is needed going forward?

This is difficult to answer, as most schemes are likely to be on urban regeneration type sites, which often have additional costs e.g. for decontamination, flood resilience etc.

The HENA assesses an annual need for 237 rented affordable homes and 72 intermediate homes above what is currently being delivered through the planning system.

The Planning Contributions and Affordable Housing SPD assessed the subsidy required to deliver an affordable home (i.e. cost minus value of income through rent etc) as being: £77,000 for a smaller dwelling (£85,500 in 2021 prices) and £108,000 for a larger dwelling (£120,000 in 2020 prices) [CIL and Planning Obligations - Torbay Council](#)

To provide 237 small rented apartments would cost: 237 x 85,500= £20,263,500 per year. Which is clearly far more than will be available.

- What happens to money from right to buy and does it have to be reinvested back into affordable or social housing?

As part of the large scale voluntary transfer agreement in 2001 where Torbay Council transferred its stock to Riviera Housing there is an obligation on the current owner Sanctuary to provide Torbay Council with a % of any Right to Buy receipts. Please note as part of this transfer agreement the % paid back to Torbay Council reduces year on year over a 30 year period. Any money received as part of this process is ringfenced for the purpose of delivering further affordable housing as per the decision at full Council.

Empty Properties

2021 All Exempt Properties

	Property Band A	Property Band B	Property Band C	Property Band D	Property Band E	Property Band F	Property Band G	Property Band H
Total	312	242	251	143	73	32	17	4

Source: C Tax Accounts - Open Revenues System October 2021

2021 Empty Properties (<6 months)

	Property Band A	Property Band B	Property Band C	Property Band D	Property Band E	Property Band F	Property Band G	Property Band H
Total	268	183	128	59	18	8	4	1

Source: C Tax Accounts - Open Revenues System October 2021

2021 Empty Properties (> 6 Months)

	Property Band A	Property Band B	Property Band C	Property Band D	Property Band E	Property Band F	Property Band G	Property Band H
Total	378	187	158	87	49	18	11	4

Source: C Tax Accounts - Open Revenues System October 2021

2021 All Empty Properties

	Property Band A	Property Band B	Property Band C	Property Band D	Property Band E	Property Band F	Property Band G	Property Band H
Total	958	612	537	289	140	58	32	9

Source: C Tax Accounts - Open Revenues System October 2021

2021 Empty Properties >6 Months – by period

Period	Property Band A	Property Band B	Property Band C	Property Band D	Property Band E	Property Band F	Property Band G	Property Band H
6 to 24Mths	234	130	117	71	36	11	6	3
2 to 5Yrs	117	38	34	12	9	6	5	1
5 to 10Yrs	21	13	7	3	2	1	0	0
>10Yrs	6	6	0	1	2	0	0	0
Total	378	187	158	87	49	18	11	4

Source: C Tax Accounts - Open Revenues System October 2021

Second Homes

Last 3 Years

Year	Property Band A	Property Band B	Property Band C	Property Band D	Property Band E	Property Band F	Property Band G	Property Band H	Total
October 2021	244	292	367	304	210	90	57	10	1,574
October 2020	241	287	354	309	214	88	58	11	1,562
October 2019	232	288	351	303	204	91	61	11	1,541

Source: C Tax Accounts - Open Revenues System

Representation by Member of the Public to Torbay's Housing Crisis Review Panel – 23 November 2021

1. One of the main problems with current social housing policy is that more resilient people stand no chance of ever meeting the criteria for social housing in rural areas. This is because of the emphasis placed on 'priority need', whether that's because of the number of children in a family, any physical or 'invisible' disability, or the number of points someone may score by living in over-crowded or dilapidated accommodation.
2. I am not seeking to change the 'priority need' criteria. Instead, I am trying to field alternative housing options for those who do not meet the 'priority need' criteria in Torbay. Particularly now that the cost of buying a home and renting in the South-West has risen so dramatically post-Covid. Other factors are the difficulties recruiting and retaining staff to work in the local hospitality, tourism - and, dare I say it - care sectors in the longer-term.
3. Furthermore, the Government's emphasis on regional devolution is likely to create job opportunities and cheaper housing options elsewhere. And all of this could render the demographic profile in small rural and seaside towns - which already have a disproportionate number of retired residents - completely chaotic and unsustainable.
4. Up until now, the option to buy a home of your own has been largely restricted to younger people in permanent employment. This bias in the system is reflected in the enduring nature of traditional forms of post-war social planning that have been unable to evolve, and the numbers of younger and middle-aged people now entering the adult social care sector primarily in order to meet the criteria for housing support.
5. Now that the Government has extended the state pension age by seven years, little thought has been given to how best to incentivise those paying extortionate rents for insecure tenancies to carry on working into late middle age. But how realistic is it to assume that people who may have already spent nearly half a century in the workplace will be content to sacrifice a large portion of what should have been their retirement years contributing to a local economy that only makes provision for young couples to advance to the status of home owners? Factor in the likelihood that any savings this unlucky generation of sexagenarians accrue between the age of 60 and 67 are likely to disqualify them from claiming any housing support they may need after the age of 68 and it becomes clear there are serious flaws and inequalities in the system as it stands.
6. Of course, local authorities themselves will eventually have to identify savings in their run-away adult social care budgets. And this is where the introduction of new and innovative forms of housing for this lost generation of contractors - not all of whom benefitted from the relatively recent statutory requirement for employers to provide work-based pensions - could provide substantial cost savings to local authorities themselves.
7. Let me give the following case study as an example: Currently, a healthy, resilient 60 year old living in rented accommodation could potentially continue to work a further seven years.

However, at the age of 68, they will face the prospect of an uncertain future paying their rent with any savings accrued in their sixties or - as is more likely - requiring a housing subsidy and Council Tax exemption from the Council for potentially another 10 to 20 years before they eventually die. And that's assuming rents have not risen to unaffordable levels in the meantime.

8. But what if cheaper, alternative forms of modular housing was made available to buy for people of any age? Surely, this would eliminate the need for more resilient people to claim Housing and Council Tax benefits as tenants in later life? Given the longevity of modern average life spans, this represents an astonishing saving for local authorities in rural areas where a small proportion of available land could be allocated to schemes providing cheap and practical modular homes and community self-build opportunities to those who are never going to qualify for 'priority housing'?
9. I realise this is a new concept in local authority housing policy. But it a practical solution in that it seeks to alleviate the mounting demand for social tenancies in rural areas - AND, most importantly, the long-term social costs associated with building homes, maintaining buildings and funding housing subsidies long into the future.
10. Of course, as with all forms of social housing, allocating the land for any kind of development has always been the major structural hurdle until now. But I just wanted to broaden the debate at this crucial stage in the strategic planning process to make way for a more innovative, multi-generational, environmentally and fiscally-sustainable approach to Torbay's immediate housing crisis.
11. I should stress that I don't wish to score political points by fielding a strategy that some might disparage as a further attempt to 'privatise' the local housing sector. Indeed, I would be the first to agree that the privatisation of the UK housing sector in its current form has been an abysmal failure and seen the re-emergence of the kind of social inequalities not seen since the beginning of the last century. But even Lenin saw the advantages of allocating small strips of land to share croppers, don't forget. And, given the complexity of the problems facing small, rural communities *this* century, I see the provision of cheaper, modular homes and community self-build options as a practical way of incentivising people to work in the local workplace at this time. Indeed, by creating a low-cost secondary market that helps people escape the traumas and uncertainty of the rent trap, we will be building the kind of resilient and resourceful society that Britain can be proud of whilst allocating local authority resources to those who need it most.

Karen Jemmett



Torbay Housing Crisis Review Panel

November 2021

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Agenda Item 3
Appendix 3

Standard Method Local Housing Need: 560-600 dwellings a year

- Required by the NPPF (paragraphs 11, 35 and 61).
- Based on household projections (2014 based), plus a buffer to reflect unaffordability of housing.
- Should reflect “need” for affordable homes plus “demand” for market homes.
- Changes every year as statistics change. 2019= 615 dwellings a year, 2020=586 dwellings a year, **2021= 559 dwellings a year.**
- Likely to rise in 2022 due to house price inflation in Torbay.
- The 2013 Housing Requirement Assessment prepared by PBA Associates found a Full Objectively Assessed Need (FOAN) of 615 dwellings a year. So other methodologies come up with similar need figures to the Standard Method.

Housing and Economic Need Assessment (HENA): 309 dwellings a year

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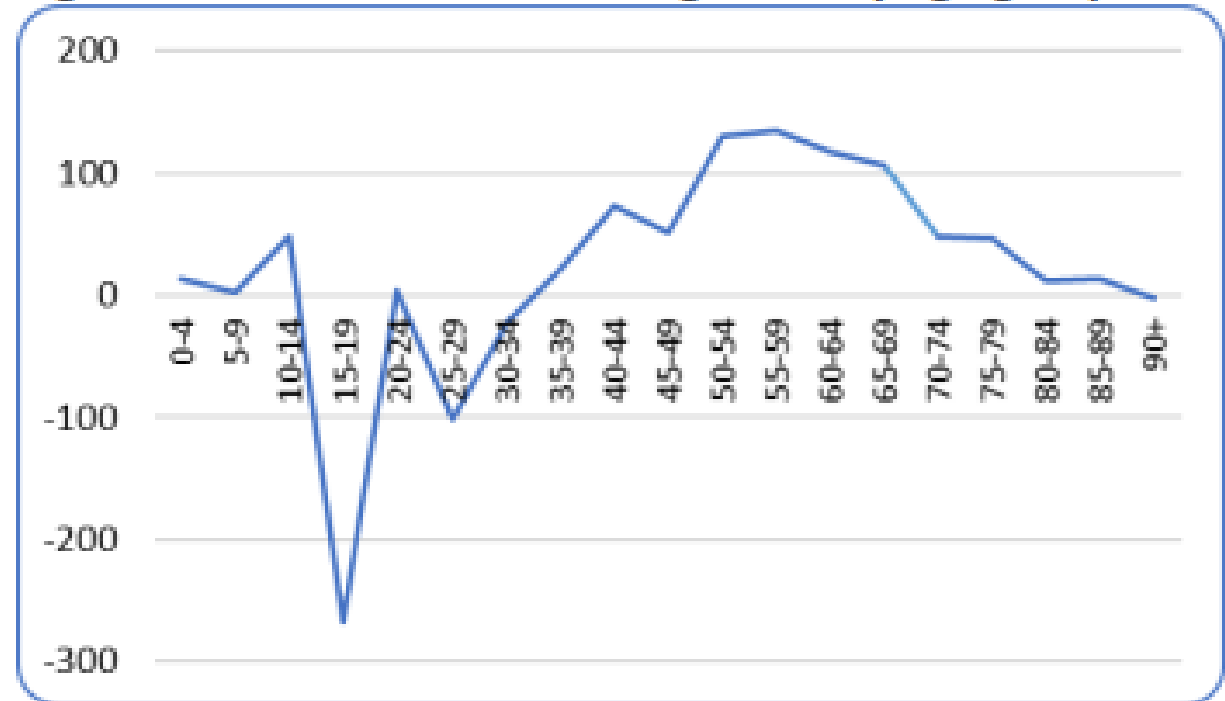


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- Gross annual need for 575 affordable rented homes per year.
 - There are 282 relets per year; which results in a need for around 293 affordable homes for rent per year.
 - 237 dwellings a year above current delivery of affordable housing.
 - Annual shortfall of 72 intermediate affordable homes per year.
 - This brings the overall affordable housing need (which is a different concept to the Standard Method need) to about 309 dwellings per year.
 - The HENA figure is lower than the 2011 Strategic Housing Market Assessment (SHMA)=500 dpa. Due to different assumptions not lower need.

Drivers of Growth- and wider implications

- Domestic inwards migration is the driver of population change.
- Migration is an element of need. We can't ignore it.
- Young people leave; older people come in.
- Issues of ageing population and demand for specialist accommodation and services.
- Not building family homes may exacerbate the ageing population. (Incomers may out-compete locals for existing stock).

Fig 3: Estimated net internal migration by age group



Source: Office for National Statistics internal migration estimates, 2020. Estimates may have been affected by the pandemic as movement may not have been accompanied by timely updates to the administrative data used to produce the estimates

Cost of housing

- House price increase of 32% over the last 10 years
- Flats have lagged at 21% (a fall in real terms)
- PRS potentially more affordable, although recent changes in the market have altered this
- Household income required to buy on the open market at LQ level - £36,000
- Household income required to rent on the open market at LQ level - £18,562
- Pressing need for temporary accommodation due to the pandemic.

Local Plan Update Options: Sources of Land

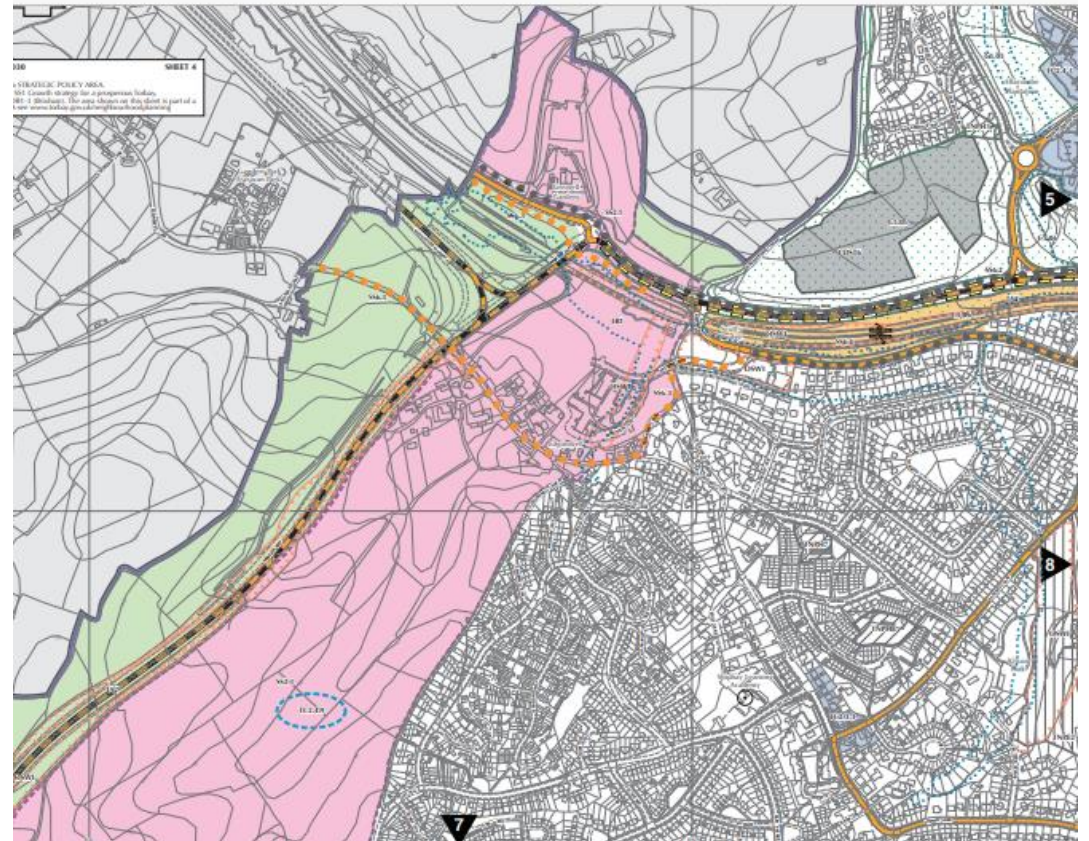
- Urban regeneration/town centre clusters
- Review of holiday accommodation areas (CTIAs etc).
- Windfalls (small <6 dwellings and larger “known unknowns”). Use historic completions rather than permissions granted to avoid overcounting.
- Existing site allocations/planning permissions (Green)
- Sites considered by officers to have relatively minor constraints (Yellow) (may still be controversial locally).
- Sites with significant constraints (e.g. within the AONB) (Amber).
- Sites rejected as not suitable (Red).

Town Centre Clusters/Urban Regeneration

- Already Largely allocated.
- They will continue to be promoted.
- Issues of delivery, site assembly, flood risk, and low demand for apartments other than in seafront etc Locations.
- Over-egging the deliverability of brownfield sites will come back to bite us.
- Brownfield sites tend to deliver less affordable housing.
- HELAA will consider options to increase yield in urban areas:
 - Reuse of holiday areas.
 - Tall buildings.
 - Reduction of commercial areas in town centres.
 - Reuse of car parks/developing buildings over car parks.
 - These have proved controversial in the past
 - Vacant dwellings

Existing allocations and Permissions

- Sites with planning permission or allocated in the existing Local Plan/ Neighbourhood Plans
- Will remain allocated/proposed, but deliverability will need to be taken into account.
- Some sites from the 2004 Local Plan (Great Parks, Hollicombe have not been built out yet).



Additional “Greenfield/Broad Location” Options

- All sites not flatly rejected (as well as the urban ones) would be needed and would need to be delivered to achieve about 9,400 dwellings over the next 20 years i.e. about 470 dpa.
- Still short of the Standard Method level of housing growth i.e. circa 560- 600 dwellings a year.
- Sustainability Appraisal and Habitats Regulation Assessment will need to consider the in-combination effects.
- All of the “Amber” sites have significant constraints
- Some Red rejected sites would need to be included to get to 560-600 dwellings a year.

HELAA Draft Findings. Numbers are approximate

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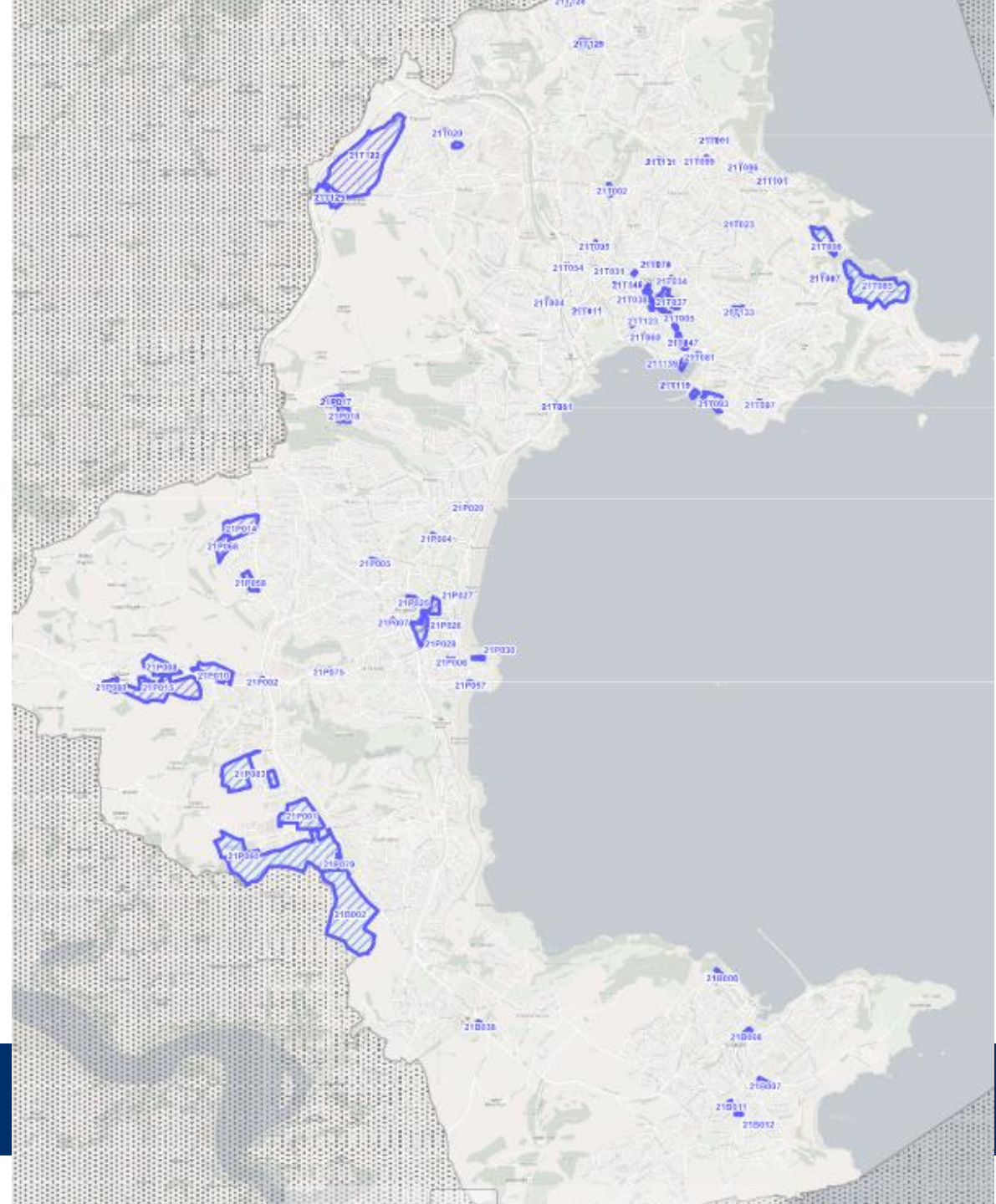
	Estimated Delivery				Total
	Years 1-5	Years 6-10	Years 11-15	Years 16+	
Green: Principle of development established.	1260	480	0	0	1740
Yellow: Minor constraints only	50	1140	540		1730
Amber: Significant constraints	10	1040	1850	1040	3940
Pink- sites that may come forward as windfalls (we will need to assess windfalls separately: at present 100 dwellings per year).	500	500	500	500	2000
Total	1820	3160	2890	1540	9410

Consultation on five options for the Local Plan

- Sustainability Appraisal and Habitats Regulations Approval needed to consider in-combination effects.
 - Where the council is unable to meet all needs in Torbay it will need to ask its neighbours to accommodate unmet need (paragraph 26 of the National Planning Policy Framework (NPPF)).
 - Local Plans will be tested against various tests, including two tests in the NPPF.
 - The Presumption in Favour of Sustainable Development
 - The Test of Soundness
- All options will promote regeneration in town centres. Housing proposals do not have to wait for the Local Plan – especially for urban regeneration type schemes.

Option 1: Existing allocations, permissions and town centre sites

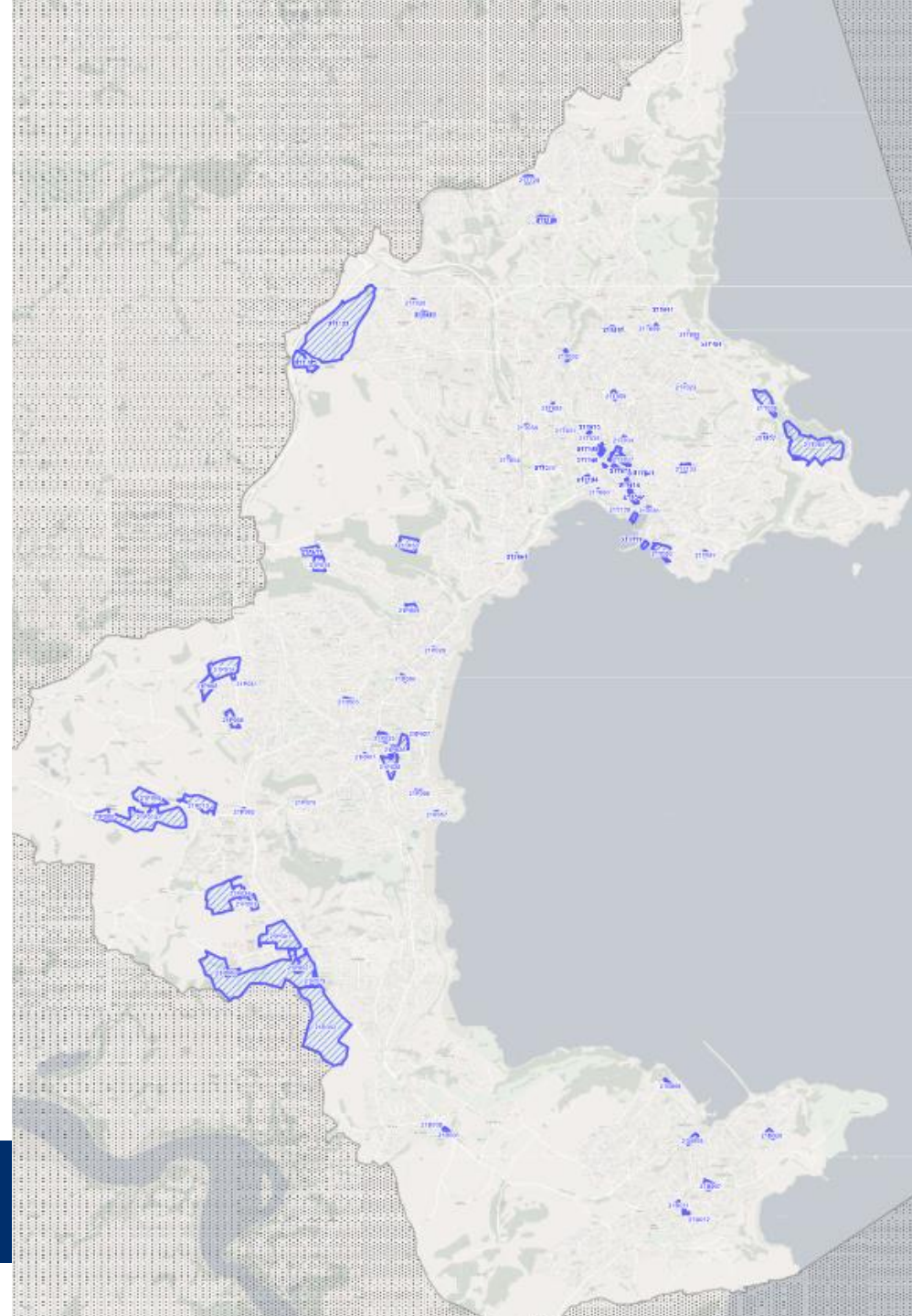
Circa 190-250 dwellings per year



Option 2: Existing allocations, permissions and sites which are assessed to have minor constraints.

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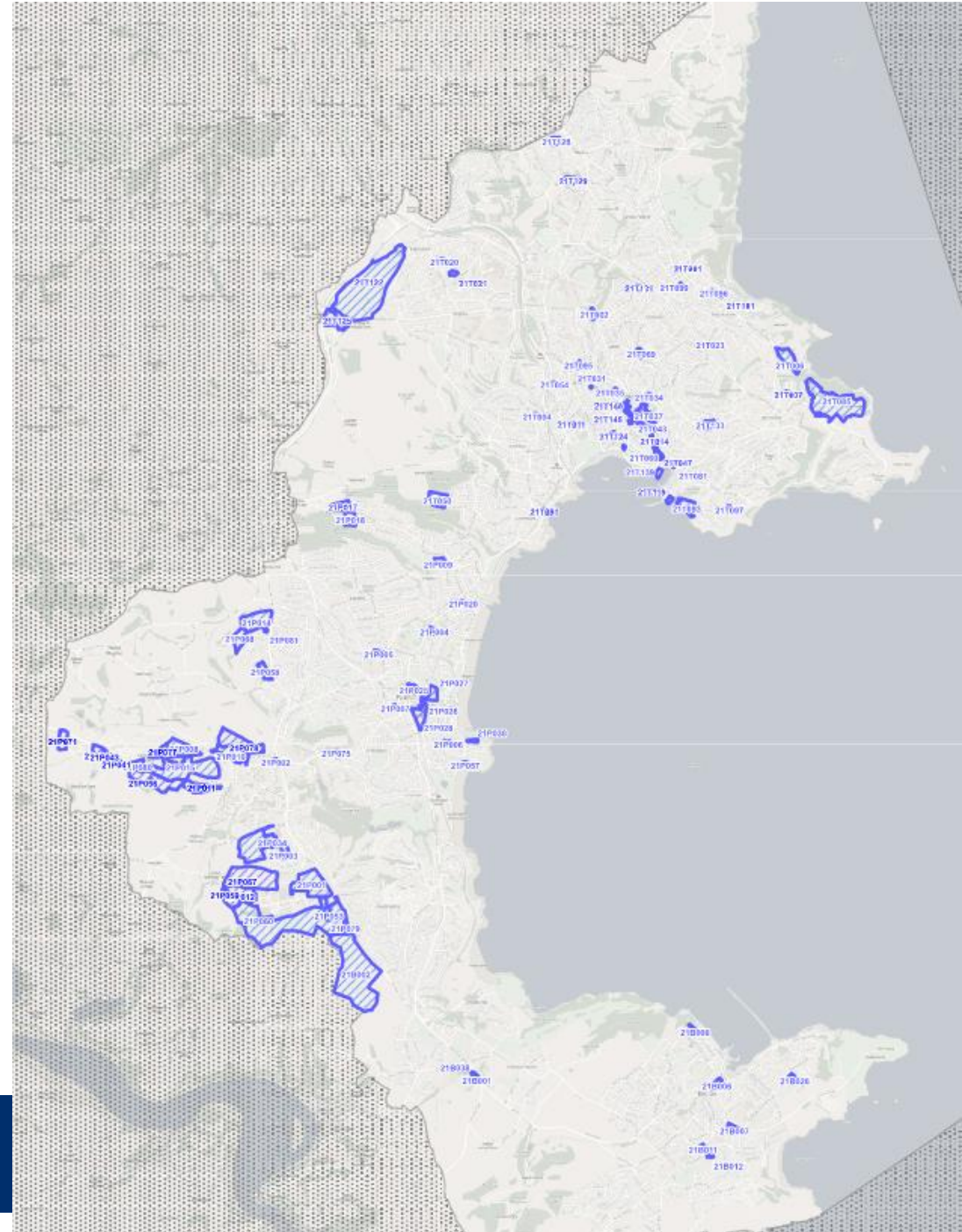
Circa 250-300 dwellings per year



Option 3: Existing permissions, allocations, sites with minor constraints, Plus an urban extension (West of Paignton shown).

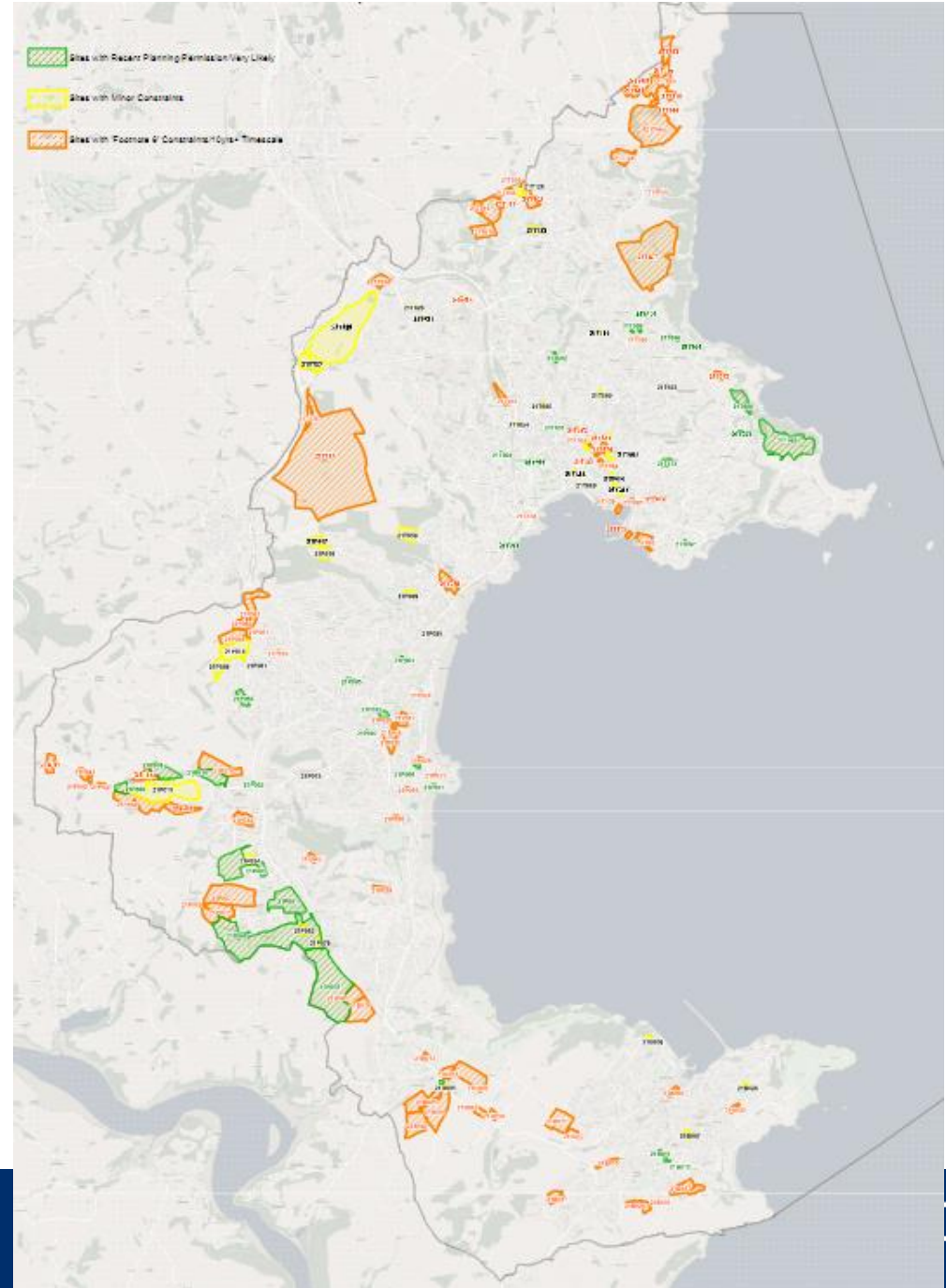
320-380 dwellings per year (Depends upon which sites are allocated (note that there is development pressure on sites around Brixham)).

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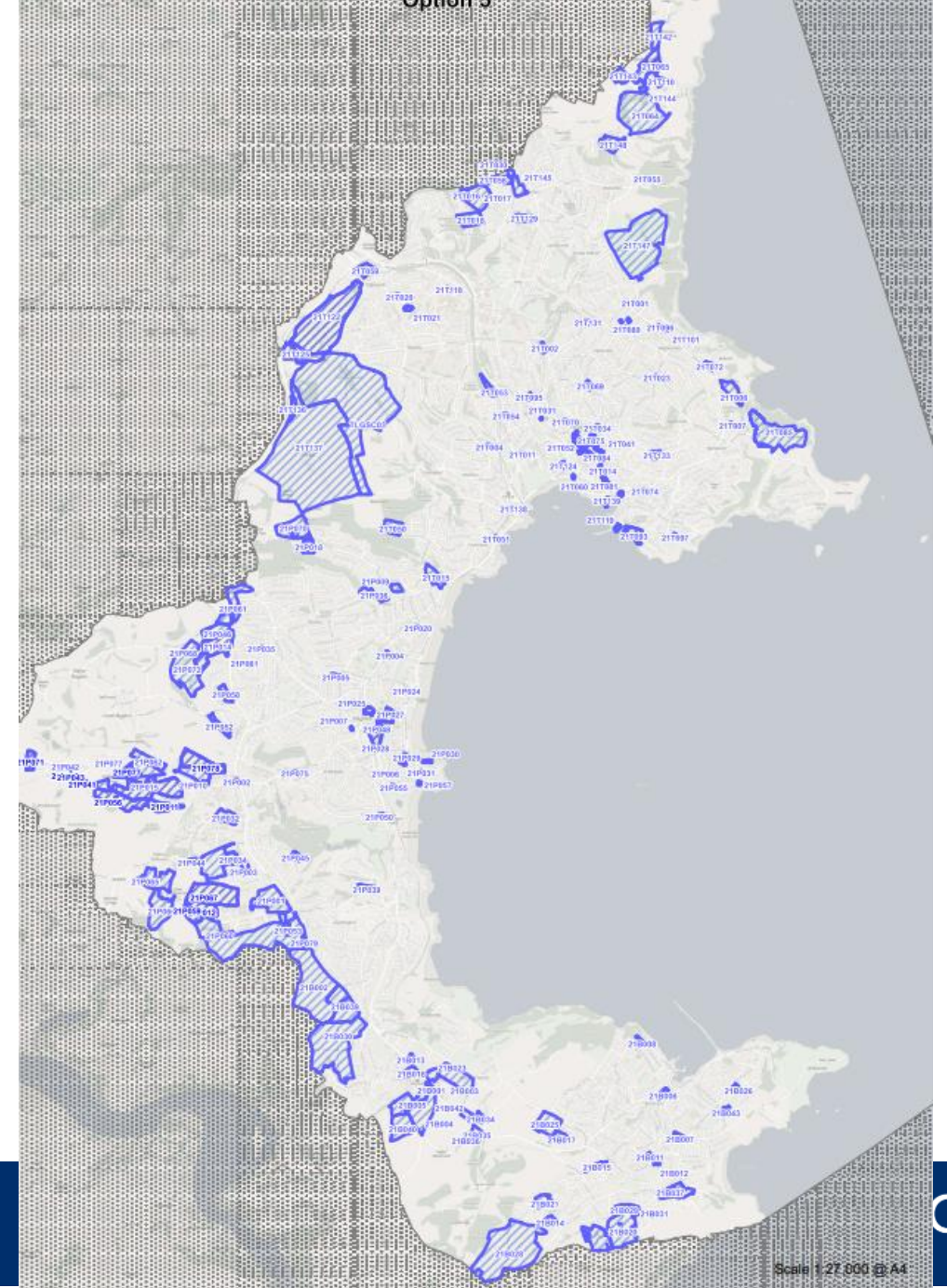


Option 4: All approved, allocated sites, plus all sites not rejected in HELAA, including “amber” sites assessed as having significant constraints. 470-500 dwellings per year.

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Option 5: Likely land take needed to achieve standard method growth level (6,000 dwellings over 10 years, 12,000 by 2040)



	Name of growth option	What this growth option would mean.	Approximate growth level 10 year Plan	Broad growth level 20 year Plan	Comment
1.	Existing allocations plus densified urban clusters	All “green” sites and emphasising increasing yield on urban sites.	2,500 (250 dpa)	3,800 (190 dpa)	No further greenfield allocation beyond sites that already have planning permission or are allocated in the existing development plan (i.e. Local and Neighbourhood Plans). This option relies on sites that have already been assessed to be suitable, so would minimise environmental harm, but would run out of greenfield housing sites post 2030. There is a substantial shortfall against need and a lack of affordable housing opportunities. Possibility of “planning by appeal” on further greenfield sites.
2.	Limited further greenfield development	All urban sites, already allocated greenfield sites and “yellow” sites. Identified as having relatively minor constraints.	3,000 (300 dpa)	5,000 (250 dpa)	A limited number of greenfield sites on sites deemed as having relatively minor constraints (i.e. excluding sensitive landscapes such as AONB or sites with high ecological value). Some locally contentious sites are likely to be allocated. There is substantial shortfall against need and limited opportunities to provide affordable housing.
3.	All urban sites, existing approvals and sites with minor constraints, plus one or two amber urban extensions.	As per option 2 all approved and allocated sites, greenfield sites with minor constraints, plus one or two further urban extensions. Several possible “sub-options” for the location of the potential urban extension exist. Further expansion at the west of Paignton appears to be the most likely candidate, based on sites that are being promoted.	3800 (380dpa)	6,500 (320 dpa)	There would be some environmental harm. The impact depends on the location of the proposed urban expansion. It will be noted that some AONB sites in the Brixham and Churston are also being actively promoted for development. This option would provide some greenfield opportunities that could deliver some affordable housing, albeit less than the level of need.
4.	All HELAA sites that are not rejected in first Officer draft.	All the HELAA, including amber sites with significant constraints must be allocated and delivered at maximum capacity. (Town centres, urban extensions at Maidencombe, Stantor, Great Parks, Collaton St Mary, Churston and Brixham.	5,020 (500 dpa)	9,500 (470 per year)	Local Green Spaces (LGS) could be avoided but there would need to be major development in the Undeveloped Coast and AONB. There is significant impact on very sensitive sites. There is a likely in-combination effects on Habitats Regulations related matters. Note that this option doesn’t meet the full objectively assessed need as measured by the government’s Standard Method, It is not clear whether the development industry would deliver this level of development even if allocated, due to sites’ constraints and market demand. This option is likely to deliver an uplift in affordable housing.
5.	Allocating sufficient land to meet the Standard Method level	To achieve a growth rate of 560-600 dwellings per year all HELAA sites, plus around 2,600 dwellings on sites rejected by the HELAA	6,000 (560-600 dpa)	12,000 (560-600 dpa)	This option would maximise the delivery of affordable housing. However it would cause significant environmental harm, and is unlikely to be compatible with Habitats Regulations and other legal requirements. It is unlikely that the market