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|  **Report to:** | **Cabinet Member: Planning and Building Control** | **Date of Meeting:** | **20 November 2019** |
| **Subject:** | **Strategic Housing Market Assessment Update 2019** |
| **Report of:** | **Chief Planning Officer** | **Wards Affected:** | (All Wards); |
| **Portfolio:** | **Planning and Building Control** |
| **Is this a Key Decision:** | **No** | **Included in Forward Plan:** | **No** |
| **Exempt / Confidential Report:** | **No** |

**Summary:**The purpose of this report is to seek approval for the Strategic Housing Market Assessment (SHMA) update 2019. |
| **Recommendation(s):** |
| That **Cabinet Member**:Approves the Strategic Housing Market Assessment (SHMA) update 2019 for publication.Notes that no affordable home ownership units will be sought on schemes of 14 homes or fewer in line with paragraph 64 of the National Planning Policy Framework (NPPF) and Policy HC1 of the Sefton Local Plan.Notes that the tenure split for affordable housing to be applied on qualifying schemes is 33:67 (between affordable/social rent and affordable homeownership) in Bootle and Netherton and 67:33 (between affordable/social rent and affordable homeownership) elsewhere in line with paragraph 64 of the NPPF.Agrees that the preferred type of affordable home ownership products are those that include some initial upfront capital payment (such as a deposit contribution).Notes that in order to be considered affordable, homes approved for discounted market sale are to be discounted to 80% of full market value or the amounts set out in table 4.26 of the SHMA (or a subsequent update) whichever is lower.Agrees that the amount of affordable housing required on a site will be calculated by units rather than bedspaces and that this will monitored to ensure it is delivering the type of affordable housing that is needed.Agrees to note the other policy recommendations in the SHMA and to seek to promote them through appropriate policy reviews. |

**Reasons for the Recommendation(s):**

To enable the Strategic Housing Market Assessment (SHMA) update to be published and to ensure the Council are applying its affordable housing policies in line with updated National Planning Policy Framework.

**Alternative Options Considered and Rejected:** (including any Risk Implications)

Not to publish the SHMA or act upon its findings. However, the evidence that support the planning policies is dated and needs to be updated to reflect changes to national policy and guidance.

**What will it cost and how will it be financed?**

**(A) Revenue Costs**

The Head of Corporate Resources has been consulted and notes that any costs associated with the publication of the Strategic Housing Market Assessment (SHMA) Update 2019 will be met from the existing Planning Service revenue budget. There are no other direct financial implications associated with this report. (FD 5844/19). Costs will be met from existing Planning Service revenue budget

**(B) Capital Costs**

n/a

**Implications of the Proposals:**

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| **Resource Implications (Financial, IT, Staffing and Assets):**None |
| **Legal Implications:**None |
| **Equality Implications:**The SHMA findings helps diversify the type and range of homes provided which will be more closely linked to need. |

**Contribution to the Council’s Core Purpose:**

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| --- |
| Protect the most vulnerable:n/a |
| Facilitate confident and resilient communities:Helps support a good range and mix of new housing, including affordable housing.  |
| Commission, broker and provide core services:n/a |
| Place – leadership and influencer:n/a |
| Drivers of change and reform:n/a |
| Facilitate sustainable economic prosperity:Having a sufficient supply of homes, including affordable homes, is important economically for Sefton’s communities. |
| Greater income for social investment: n/a |
| Cleaner Greenern/a |

**What consultations have taken place on the proposals and when?**

**(A) Internal Consultations**

The Head of Corporate Resources has been consulted and notes that any costs associated with the publication of the Strategic Housing Market Assessment (SHMA) Update 2019 will be met from the existing Planning Service revenue budget. There are no other direct financial implications associated with this report. (FD 5844/19).

Chief Legal and Democratic Officer (LD 4078/19) have been consulted and comments have been incorporated into the report

**(B) External Consultations**

**Implementation Date for the Decision**

Following the expiry of the “call-in” period for the Minutes of the Cabinet Meeting

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| **Contact Officer:** | Ian Loughlin |
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**Background Papers:**

* The Strategic Housing Market Assessment update 2019
* Comments to, and Council responses, to the draft Strategic Housing Market Assessment update 2019

**1. Introduction/Background**

* 1. The Sefton Local Plan (adopted in April 2017) was based on a Strategic Housing Market Assessment completed in 2014 on the Council’s behalf by JG Consulting. Since the adoption of the Local Plan in 2017 the National Planning Policy Framework (NPPF) has been updated, firstly in July 2018 and again in February 2019. The Planning Practice Guidance (PPG) on housing need and supply was also revised in February 2019 and then again in July 2019. Each of these revisions has potential implications for how the Council implements its housing policies in the Local Plan.
	2. Local Plan policy HC1 (part 11) specifically sets out that in implementing the policy ‘the Council will have regards to the definitions of affordable housing in relevant national guidance as they may change over time’ and ‘changes in the Borough’s requirements for affordable and special needs housing based on new evidence of need as set out in future commissioned Strategic Housing Market Assessments or similar studies.’ It was therefore considered necessary to update the Strategic Housing Market Assessment to reflect the changes to the NPPF and PPG and to assess how this may influence the application of the Council’s housing policies.

1.3 A draft Strategic Housing Market Assessment (SHMA) update was published by the Council in July 2019 and was made available for comments. Thirteen organisations/individuals made comments on the draft SHMA update. These comments, and the Council’s response, are set out at Annex A.

1. **The draft Strategic Housing Market Assessment update**

2.1 The SHMA is divided into a number of sections that consider a specific housing issue in depth. The report looks at evidence that has been updated since 2014 and, considering the context of the amended NPPF, PPG and the current Local Plan policies, makes recommendations for changes in the way the Council applies its housing policies. Some of these recommendations will be able to be implemented within the current Local Plan planning policy framework; whilst others are likely to need a review or partial review of the Local plan if they are to be taken forward.

2.2 The issues that are addressed in the SHMA update are:

* Sefton Area Profile;
* Demographic Trends and Housing Needs Projections;
* Affordable Housing Need;
* Family Households and Housing Mix;
* Older People and People with disabilities;
* Private Rented Sector; and
* Self and Custom Build Homes.

2.3 Each of these are considered in turn with the key recommendation (if any) set out.

Sefton Area Profile

2.4 This section looks at the profile of the borough (and the six sub areas) in terms of population and housing. This includes the age structure across Sefton, the type and tenure of homes available in the borough, whether homes are under occupied, employment levels and academic qualifications of residents. This analysis confirms that a ‘one-sized fits all’ set of policies for the borough is not relevant in Sefton and that the SHMA, and therefore the planning policies, need to look at variations across the borough. This is consistent with the approach in the current housing policies in the Local Plan and is what would have been expected.

Demographic Trends and Housing Needs Projections

2.5 Previously, assessing the level of housing need has been for individual local authorities to prepare by following advice in Planning Practice Guidance (PPG). This is how Sefton derived its current housing requirement set in the Local Plan. However, the new National Planning Policy Framework (NPPF) of February 2019 (updated in July 2019) has introduced a Standard Method, based on looking at projected household growth and adjustments based on the level of affordability in an area.

2.6 Applying the Standard Method suggests household growth of about 557 per annum, plus an uplift of around 16% for affordability. Therefore, the objectively assessed housing need (OAN) for the Borough as a whole is for 645 dwellings per annum. This calculation has been based on household growth in the 2018-28 period and a 2017 affordability ratio.

2.7 The figure of 645 dwellings per annum can be compared with the housing target in the Local Plan – this was for 11,520 dwellings over the 18-year period to 2030 (an annual average of 640 dwellings per annum, albeit with a stepped trajectory). Given levels of delivery since 2012 (i.e. there is an accumulated backlog) the average requirement to the end of the plan period is somewhat higher than the Standard Methodology and therefore the current Local Plan would comfortably meet this need. Therefore, at present the Local Plan target remains reasonable and is certainly not seeking to underprovide housing.

2.8 Overall, the analysis of housing need based on the Standard Method, including an understanding of how the population profile might develop, is consistent with the Council’s adopted housing requirement.

Affordable Housing Need

2.9 The SHMA update includes analysis to estimate the need for affordable housing in the 2017-36 period. The analysis is split between a ‘traditional’ need (which is mainly for social/affordable rented accommodation) and is based on households unable to buy or rent in the market and the ‘additional’ category of need introduced by the revised NPPF/PPG (which includes housing for those who can afford to rent privately but cannot afford to buy a home). The analysis has taken account of local housing costs (to both buy and rent) along with estimates of household income. Additionally, when looking at traditional needs, consideration is given to household projections and estimates of the supply of social/affordable rented housing. For the additional definition, consideration is given to the size of the private rented sector and the potential supply (from Land Registry data) of cheaper accommodation to buy.

2.10 The analysis suggests a need for an additional 391 affordable homes per annum and therefore the Council is justified in continuing to seek secure affordable housing as part of new developments. This need is for subsidised housing at a cost below that to access the private rented sector (i.e. for households unable to access any form of market housing without some form of subsidy). It would be expected that this housing would primarily be delivered as social/affordable rented housing.

2.11 The estimated level of affordable housing need in this assessment is slightly lower than suggested in the 2014 SHMA (a need for 434 affordable homes per annum). However, it is not considered that this is a substantial change, with both assessments clearly demonstrating a significant need for affordable housing across the Borough. Furthermore, it was acknowledged by the Local Plan Inspector that the total affordable housing need is unlikely to be delivered wholly through planning obligations and therefore the Council should continue to maximise the amount of affordable housing it can.

2.12 Therefore, the current Local Plan policy of seeking to secure 15% of affordable housing on qualifying schemes (in Bootle/Netherton) and 30% elsewhere of housing development in affordable homes remains valid.

2.13 The SHMA update also looks at the expanded NPPF definition of affordable housing to assess households in need of affordable home ownership products. It considers that households falling into this definition would be suitable for Starter Homes, Discounted Market Sales housing, Shared Ownership homes or similar products.

2.14 The NPPF states “Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.” (NPPF, para 64). The SHMA update considers the level of need for these types of dwellings in Sefton.

2.15 The Planning Policy Guidance of July 2018 confirms a widening definition of those to be considered as in affordable need; now including ‘households which can afford to rent in the private rental market, but cannot afford to buy despite a preference for owning their own home’. However, at the time of writing, there is no guidance about how the number of such households should be measured.

2.16 The methodology for making an assessment of affordable home ownership in the SHMA update draws on the current method for assessing the need for ‘traditional’ affordable housing but also looks at the ‘gap’ between buying and renting. The assessment seeks to understand what the gap is between renting and buying in Sefton and establishing the typical incomes that may be required to bridge the gap. The analysis suggests there is a need for 315 homes to be available per annum for affordable homes ownership. This need is spread unevenly across the borough, with the greatest need in Southport and Crosby, with no identified in Bootle and Netherton.

2.17 As with identifying housing need for affordable home ownership, the PPG does not include guidance for establishing affordable housing supply. The SHMA update employs two methods of calculating affordable home ownership supply need in lieu of guidance. The first method looks at the lower quartile cost of a home to buy in the borough (and sub-areas). This would suggest an annual supply of 1,110 homes for affordable ownership. The alternative way is to estimate how much housing is available at an equivalent price (in income terms) to accessing the private rented sector. This would suggest an annual supply of 822 homes for affordable ownership. Each approach is valid and indicates a significant notional supply of affordable homes for purchase.

2.18 The analysis shows at the borough level a potential supply to meet the need regardless of the supply measure used. There are exceptions to this with the second approach identifying a current shortfall in Formby, Maghull and Crosby. Notwithstanding a theoretical over-supply of affordable homes to purchase, it should be noted that this stock is not necessarily available to those households in need – i.e. the homes for sale are not restricted to those in housing need and these homes are available to anyone who wishes to purchase them on the open market, including investment buyers. There may also be issues with the quality of stock at the bottom end of the market.

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|  | METHOD 1Annual **supply** of homes priced below lower quartile | METHOD 2Annual **supply** of homes priced an equivalent level to private rented | Estimated gross (annual) **need** for affordable home ownership | Notional shortfall (-) or over supply (+) or homes available to purchase at an affordable price |
| Southport | 413 | 165 | 137 | +276 or +28 |
| Formby | 92 | 17 | 42 | +50 or -25 |
| Maghull/Aintree | 146 | 21 | 50 | +96 or -29 |
| Crosby | 200 | 58 | 87 | +113 or -29 |
| Bootle | 161 | 431 | 0 | +161 or +431 |
| Netherton | 98 | 130 | 0 | +98 or +130 |
| **Total** | **1,110** | **822** | **315** | **+795 or +507** |

2.19 So, while there may seem to be a sufficient supply of homes to purchase at an affordable price across the borough (a range of between 507 to 795) there are likely to be residents who are unable to access the necessary capital to purchase a home or face competition from other residents and/or investors. Therefore, it is considered reasonable to attempt to secure home ownerships homes, in line with NPPF, as part of the package of affordable homes.

2.20 Given the nature of the likely demand for affordable homes ownership in Sefton, and the reasons that drive this, the SHMA update suggests that shared ownership is likely to be the preferred product, rather than discounted market sale. This has the benefit of requiring a much lower deposit and lower overall costs (due to the rent being subsidised). It also allows the Council to require that any funds secured through ‘staircasing’ can be recycled for other affordable housing in the local area. Other schemes that assist with a deposit contribution may also be appropriate.

2.21 It is not expected that discounted market sale housing would usefully meet an affordable home ownership need in Sefton, as the barrier for many residents is the ability to access the capital for a deposit. The ability of cheaper market housing would not address this issue as cheaper homes already exist. If the Council were to accept discounted market housing for sale as an appropriate product for affordable home ownership there is likely to have to be significant reductions for this to meet an actual need. The SHMA update suggests sale prices for different parts of Sefton which broadly suggest a discount of 30-40%.

2.22 The NPPF requirement that on schemes of 10 or more homes at least 10% of the homes should be made available for ‘affordable home ownership’ products is slightly incompatible with the Council’s requirement for affordable housing in terms of the tenure split the Council currently seek in the Local Plan. The SHMA update therefore suggests that the tenure split of affordable housing secured on new developments should be revised to reflect this. The following is suggested:

2.23 For schemes of 15 homes (i.e. the point when the Council seeks affordable homes) or more:

* In Bootle in Netherton the split will need to be 33:67 between affordable/social rented and affordable home ownership products. Currently the split is 50:50.
* Outside Bootle and Netherton the split will need to be 67:33 between affordable/social rented and affordable home ownership products. Currently the split is 80:20.

2.24 In both cases there will be more affordable home ownership products secured than under the current approach. This is likely to greatly assist people who are currently in private rented accommodation and who wish to purchase a property, but are currently prevented from doing so. These are likely to be households who may not be eligible for social housing, due to their earnings or circumstances, but who struggle to access a deposit to purchase a home. Whilst this will result in fewer homes in the affordable/social rented tenure, it would be difficult to retain the current tenure split as this does not accord with the changes to the NPPF. One likely beneficial consequence is that the amended tenure split is likely to be a more viable than the current tenure split, and this should help secure affordable housing units on sites that have viability issues.

2.25 The NPPF paragraph 64 requirement applies to major schemes as part of the overall housing contribution from the site. Major schemes are defined as schemes of 10 homes or more. The Council had previously interpreted this that on schemes of 10 to 14 homes, which are not currently caught by the Council’s affordable housing requirement, it should seek to secure a minimum of 10% of the properties (i.e. 1 or 2 properties) as an affordable home ownership unit. The Council has currently been seeking this as an interim position across Sefton since September 2018.

2.26 However, a recent appeal decision at Damfield Lane, Maghull for 14 homes, the applicant challenged this interpretation. They put forward the argument that, as the Local Plan threshold for affordable housing was informed by a viability appraisal, then to ask for an affordable housing contribution below this was incorrect. The Inspector agreed and concluded that as the Council’s Local Plan policy for affordable housing does not apply to schemes below 15 units, then it is not appropriate to apply the NPPF paragraph 64 requirement to proposals below that amount. As such it is unlikely that we will be able to continue to seek to secure an affordable home ownership unit on schemes of 10-14 homes. This is unlikely to make much of difference as over the past 2 years (2017/18 and 2018/19) there have only been 8 schemes approved that are within this category and these would have only secured between 8-12 affordable home ownership units.

2.27 The SHMA update suggests that the Council may want to consider an overall affordable housing target in excess of the current 30% affordable housing on schemes outside Bootle and Netherton to maximise all forms of affordable housing. This level of change would have to be pursued within a Local Plan review.

2.28 The SHMA update suggests that if the Council were to seek additional homes in the affordable home ownership sector they may want to consider setting up a register of people interested in these products.

Bedspaces v Units

2.29 To maximise the amount of affordable housing that the Council achieved on development sites and ensure that all affordable housing was not provided in very small units, it was decided, through the Local Plan, to use bedspaces to calculate the total amount of affordable housing required. However, whilst this has had some success in securing additional affordable units, in some instance’s developers have turned this around and used it to reduce units. They have done this by putting the affordable housing in larger 4-bedroom homes and providing more bedspaces in fewer dwellings. This has had the unintended consequence of developers providing the wrong mix of affordable housing to what is needed, i.e. smaller properties.

2.30 Whilst the use of bedspaces is set out in Policy HC1 of the Local Plan, which was found sound by the planning inspector, the policy also states specifically as part 11 that:

*‘In implementing the policy, the Council will have regard to changes in the Borough’s requirements for affordable housing based on new evidence of need as set out in future commissioned Strategic Housing Market Assessments or similar studies.’*

2.31 The SHMA update has recognised this issue and suggests the Council considers reverting back to units as the means to calculate the number of affordable homes on a scheme. Whilst this should result in a mix affordable homes that will be of a size that more closely meets the actual need. It is therefore proposed that the calculation of affordable housing is based on units, but that this will be monitored to ensure that it achieves the desired outcome. This approach reflects the Local Plan and the need to take account of the changing affordable housing information.

2.32 If calculating the amount of affordable housing by units does not result in the desired mix of affordable housing, or if the total amount of affordable housing significantly drops, then the Council could revert back to bedspaces as a means of calculation. The policy as adopted recognised the need to monitor delivery on an ongoing basis and officers consider this is an appropriate response to deliver the Council’s strategic goals.

Family Households and Housing Mix

2.33 There are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households’ ability to save; economic performance and housing affordability. The analysis in the SHMA concludes that the following represents an appropriate mix of affordable and market homes, taking into account both household changes and the ageing of the population:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Housing Tenure** | **1 bedroom** | **2 bedrooms** | **3 bedrooms** | **4+ bedrooms** |
| **Market** | 5% | 30% | 45% | 20% |
| **Affordable Home Ownership** | 25% | 40% | 30% | 5% |
| **Affordable Housing (Rented)** | 35% | 30% | 30% | 5% |

2.34 This mix is considered largely applicable to all parts of the borough, although in Bootle/Netherton there is likely to be a greater demand for 1 bedroom affordable rented properties.

2.35 The suggested mix above is compatible to the housing mix requirement for market homes set out in Policy HC2 of the Sefton Local Plan. This policy requires a minimum of 25% of market homes to have 1 or 2 bedrooms and a minimum of 40% of market homes to have 3 bedrooms. Based on the findings above it is not suggested that the current Local Plan policy is amended in relation to market homes but that the policy is regularly monitored.

2.36 For affordable housing the Council does not currently require a specific housing mix. The Council instead sought to control the amount and type of affordable homes through the application of bed spaces for the basis of calculating the total number sought. The intent behind this was to ensure that the Council secure 30% of the total scheme as affordable homes and to prevent developers putting all the affordable homes into one bedroom units to maximise income. However, the application of this policy has had unintended consequences and on occasion the size of the affordable housing units do not necessarily meet the need. In particular, to minimise affordable housing units, there have been too many four-bedroom homes provided as affordable homes when the need is for smaller units.

2.37 The SHMA update recommends that the Council consider linking its affordable housing policies to units rather than bed spaces This would also bring it into line with the governments approach set out in relation to affordable home ownership. If the Council were to do this it would need to introduce a policy to secure a reasonable mix of size of homes for affordable housing in a similar vein to market homes, based on the table above. This will be something the Council should consider within a Local Plan review.

Older People and People with disabilities

2.38 The SHMA update has identified that in general, Sefton has higher levels of older people and people with a disability compared with other areas, and that an ageing population means that the number of people with disabilities is likely to increase substantially in the future. Key findings include:

* 33% increase in the population aged 65+ over 2017-2036 (potentially accounting for over 100% of total population growth);
* A need for additional sheltered/retirement housing (currently in the leasehold sector but also for rent in the future)
* A current and future need for housing with care (enhanced sheltered and extra-care housing) in both the rented and leasehold sectors;
* A need for additional care bedspaces; and
* a need for up to 780 dwellings to be for wheelchair users (meeting technical standard M4(3))

2.39 The analysis in the SHMA update shows a need for 3,481 dwellings with support or care (equivalent to 183 per annum). These homes are included within the overall need of 645 dwellings per annum and not additional to it. The need for care home bedspaces (1,442 – 76 per annum) are however considered to be in addition to the 645 per annum figure. Housing with support/care (e.g. sheltered/extra-care) should therefore be counted against the housing supply, even if such accommodation is classified as being in a C2 use class.

2.40 Of the 3,481 dwellings with support and care requirement there is a need for approximately 1,300 extra care housing. The SHMA update estimates that in the future 70% of these will need to be in the affordable rented sector and 30% market. There is no current requirement to seek a proportion of affordable units on extra care schemes and affordable extra care units will often be provided by the Council or Registered Providers. The Council could only introduce a policy to secure a proportion of extra care housing as affordable through a review or partial review of the Local Plan subject to viability testing.

2.41 The SHMA update suggests that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings. The Council’s Local Plan policy (HC2) requires 20% of new market homes to be built at M4(2) Standards (on larger sites of 50+ homes), although given the evidence, it is suggested that the Council could consider (as a start point) requiring all dwellings to meet the M4(2) standards (which are similar to the Lifetime Homes Standards) and at least 10% of homes which are allocated by the local authority meeting the higher M4(3) standards.

Private Rented Sector

2.42 The private rented sector accounted for around 13% of all households in Sefton as of 2011. However, the number of households in this sector has grown substantially since - increasing by 64% in the 2001-11 period. The private rented sector has some distinct characteristics, including a much younger demographic profile, a high proportion of households with dependent children (notably lone parents) and levels of overcrowding that are relativity high. Additional analysis suggests that rent levels have not changed significantly over time (when looking at the 2011-18 period) – this would suggest that despite the large increase in the size of the sector, there is no obvious lack of supply of private rented homes.

2.43 The SHMA update has not attempted to estimate the need for additional private rented housing. It is likely that the decision of households as to whether to buy or rent a home in the open market is dependent on a number of factors which mean that demand can fluctuate over time; this would include mortgage lending practices and the availability of Housing Benefit. A general (national and local) shortage of housing is likely to have driven some of the growth in the private rented sector, including increases in the number of younger people in the sector, and increases in shared accommodation. If the supply of housing increases, then this potentially means that more households would be able to buy, but who would otherwise be renting.

Self and Custom Build Homes

2.44 The evidence of the demand for self-build (from both portals and the Council’s self-build register) suggest that this is relatively minimal. It is however possible that these sources do not fully capture the extent of the market in the area and increasing the supply could increase awareness of self-build as an option. The Council have recently approved two small schemes for self/custom build homes (one in Thornton, the other in Maghull) and will look to market these soon. This will hopefully help gauge the level of actual demand in the area. Given the information available about self- and custom-build in Sefton, the Council’s current policy (part of HC2) to ‘support proposals for custom or self-build homes on appropriate sites’ seems reasonable and proportionate.

**3. Next steps**

3.1 If approved the Strategic Housing Market Assessment update will be published online and will inform future policy reviews. The changes to approach as set out in the recommendations will be applied to future planning applications. A report will be brought to Cabinet Member in 12 months to set out what impact the change from bedspaces to units as a means of calculating affordable housing is having and whether to continue with this approach.