# **Dover District Council**

# Affordable Housing Delivery Plan

2010 - 2015

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#### **AFFORDABLE HOUSING DELIVERY PLAN 2010-2015**

#### **FOREWORD**

Being able to live in a decent home that you can afford is central to people's happiness and well-being. Unfortunately, we know from research we have undertaken that there are many households living in the District who are unable to afford to buy or rent a home in the private market and are consequently living in unsatisfactory housing.

The Affordable Housing Delivery Plan sets out the Councils targets for the delivery of affordable homes over the next five years, the type and quality of housing it wants to see delivered across the District and the likely level of resources that will be required to achieve this.

While the Plan recognises the need to address a shortage of rented homes it also acknowledges the role that low cost home ownership schemes can play in meeting housing need and resident's aspirations and in helping develop more balanced communities.

An approved Local Development Core Strategy which supports housing growth means that the Council is now in a strong position to deliver more affordable housing through the planning process. In addition we will encourage housing associations and other affordable housing development partners to be pro active in seeking out new opportunities to provide new affordable homes and make best use of existing resources.

The Plan reflects the wide range of needs evidence available to us and its objectives are intended to not only meet the need for affordable homes but to help create sustainable communities where people want to live.

The Plan links directly to a wide range of other strategies that seek to improve the opportunities, health and well being of local people and its importance is reflected in the Council's overarching Housing Strategy which the Plan underpins.

We know that effective partnership working will be key to delivering the Plan and maximising the resources necessary to achieve the objectives and targets. However, we also fully appreciate that delivering the Strategy will require significant resources from outside of the Council and that the Strategy has been prepared during a period of financial uncertainty. Consequently, while we are committed to exploring every funding opportunity available to help achieve our objectives, we recognise that the Strategy will need to be reviewed in the light of any significant changes in the amount of funding available.



Councillor Frederick Scales

Deputy Leader of the Council & Portfolio Holder for Economy and Special Projects

#### **AFFORDABLE HOUSING DELIVERY PLAN 2010 – 2015**

#### **EXECUTIVE SUMMARY**

#### 1. Introduction

- 1.1 Our Corporate vision for Dover District is a "future of strong economic growth within safe and sustainable communities". There is recognition that "the provision of good quality and accessible housing that meets the needs of the whole community" will play a key role in achieving this.
- 1.2 The South East Plan has set a target for the overall delivery of 10,100 new homes within Dover District by 2026. In our Local Development Framework Core Strategy we have adopted this target but have also set a higher growth target of 14,000 new homes.
- 1.3 Our planning policy will seek that 30% of the new homes within developments of 15 homes or more should be affordable in order to meet the housing needs of people who can't afford to buy a home in the market and to ensure a balanced housing market and the development of mixed, inclusive communities. Consequently, there is likely to be the potential to deliver a significant number of new affordable homes over the Core Strategy period, provided that we can secure the financial resources that will be required.
- 1.4 The main recommendations within the Plan are:
  - That in the current uncertain economic climate, we set a target for the delivery of 650 affordable homes over the next five years, which will be reviewed annually to take account of changing conditions.
  - That we make better use of the existing housing stock through measures identified in the Plan and in our Private Sector Housing and Empty Homes strategies.

#### 2. Aims & Objectives

- 2.1 Our overall aim is to work towards ensuring that all households in the district have access to good quality homes, which meet their needs and are affordable.
- 2.2 Our objectives are therefore to:
  - Work effectively with partners to increase the supply of affordable homes across the district in support of the Council's wider regeneration and economic development objectives.
  - 2. Ensure that affordable housing positively contributes to attractive, secure and sustainable mixed communities.
  - 3. Deliver a range of affordable homes that will meet the needs of all sections of the community.
  - 4. Ensure that new homes are designed to be as affordable as possible.
  - 5. Make best use of the existing housing stock.

#### 3. The Need for Affordable Housing

- 3.1 The East Kent Strategic Housing Market Assessment 2009 (SHMA) identified 21 local housing housing market areas within the East Kent sub region and ranked all three of the urban LHMAs within Dover District (Dover, Deal & Sandwich) within the top 6 areas of local housing need.
- 3.2 The SHMA calculated that in order to meet the backlog of housing need and newly arising need over the government's recommended timescale (5 years) we would have to deliver 1,489 new affordable homes per year.
- 3.3 We know that even in a more stable economic climate this would be very difficult to achieve but the figure highlights the scale of the problem and provides the evidence which supports the Council's planning policies in respect of affordable housing and the need for the necessary financial resources to deliver a significant increase in delivery.
- 3.4 Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. It therefore meets a wide range of needs from those households who are especially vulnerable and need to be supported in their home, through to households who want to get their foot on the home ownership ladder and key public sector workers such as nurses and policemen who initially, may only be able to buy an equity share in a property.
- 3.5 In addition to the issue of the number of affordable homes that the District needs, the Plan also sets out how we will deliver affordable homes of the right size and type and ensure that they are of a high quality and sustainable.

# 4. Meeting the Need

- 4.1 We will meet the need for affordable housing in two main ways:
  - Enabling the building of new affordable homes
  - Making better use of the existing housing stock

# **Enabling the Building of New Homes**

4.2 Our role in relation to the delivery of affordable housing is primarily an enabling one. Through the use of planning powers and effective partnerships with Registered Social Landlords (RSLs) and the Homes & Communities Agency we will ensure that the right type of homes are provided to create mixed and sustainable new communities. We will also work with our partners to ensure new homes are of a high quality and through good design will remain affordable.

#### **Rural Homes**

- 4.3 Whilst much of the planned housing growth will be within the urban areas we recognise that many households are affected by the shortage of affordable housing in the district's rural area. We are also aware that affordable homes can benefit rural communities by helping to sustain village amenities. We will therefore work with our partners to develop a manageable programme for the delivery of affordable rural homes.
- 4.4 We appreciate that general conditions in the housing market continue to be challenging and therefore recognise that we need to flexible and innovative in our approach to delivering the affordable housing needed and accessing any new resources that may become available.

#### **New Homes Target**

4.5 Housing market uncertainty means that it is impossible to forecast, with any degree of precision, the number of new affordable homes that will be delivered over the life of the Plan. However, there are schemes which have been progressed to a stage where we are reasonably confident they will be delivered. On the basis of these known schemes, we have set ourselves a target to deliver 250 affordable homes over the next two years with an aspiration for the delivery of a further 400 over the remaining three years of the Plan. This will be a significant increase on the 284 affordable homes that were delivered between 2005 – 2010.

#### **Grant Funding**

- 4.6 The relatively low sales values in parts of the district, particularly in Dover town and Deal, means that many potential housing schemes are only marginally viable and that without grant funding for the affordable homes they may either not be deliverable or will only be delivered with a reduced amount of affordable housing. We anticipate that over the longer term as market conditions improve and regeneration schemes progress, values will improve and the requirement for grant funding will reduce. In the meantime, it is likely that most affordable housing coming forward over the life of this plan will require grant funding.
- 4.7 We have estimated the grant requirement in order to achieve our first two year's target to be approximately £16m and given clearly evidenced need for more affordable housing in the district combined with our commitment to housing growth and planned regeneration we believe we can make a strong case to the Homes & Communities Agency for the funding required.
- 4.8 We recognise that may households aspire to home ownership and while problems in the housing market have adversely affected the provision of Homebuy (shared ownership) products we will work with partners to raise awareness of the products as the market recovers.
- 4.9 The marginal economic viability of many development opportunities within the district means that public subsidy in the form of grant from the Homes & Communities Agency will be required for most of the affordable housing delivered over the life of this Plan. We have estimated the grant requirement in order to achieve our first two year's target to be approximately £16m.

# Making Best Use of the Existing Stock

4.10 As well as delivering more new affordable homes we believe there is scope to deliver some of the affordable housing needed by making better use of the existing stock of private sector and affordable homes. We will explore such areas as private sector leasing, utilising long term empty homes, improving access to private rented housing and reducing under occupation in the affordable housing sector so as to 'free up' family homes. These are covered in more detail in our recent private Sector Housing and Empty Homes strategies.

#### 5. Action Plan

5.1 An Action Plan is attached to the Delivery Plan and progress against the various targets will be monitored will be regularly monitored by the Affordable Housing Working Group and Strategic Housing Executive. The Plan will be subject to an annual review and targets adjusted to reflect new opportunities and the availability of resources.

# **AFFORDABLE HOUSING DELIVERY PLAN 2010-2015**

#### 1. INTRODUCTION

- 1.1 The Council's vision for Dover District is a "future of strong economic growth within safe and sustainable communities". There is a recognition that "the provision of good quality and accessible housing that meets the needs of the whole community" will play a key role in achieving this.
- 1.2 The Council's intention to secure housing growth in order to support its economic development and regeneration aspirations for the District are backed by planning designations such as International Gateway, Regional Hub and Growth Point. We recognise that the delivery of the right type and number of affordable homes will be essential to ensuring balanced and sustainable new communities.

#### 2. PURPOSE OF THE PLAN

- 2.1 The preparation of this Plan coincides with the finalisation of our Local Development Framework Core Strategy document which sets out the Council's vision for change and how it will seek to shape the district as a place to work, relax and visit. It will determine the future pattern of development in the district and the way in which the social, economic and environmental needs of the area can be delivered in the most sustainable way. The Core Strategy adopts a high growth approach to the provision of new housing generally and recognises the importance of addressing the need for affordable housing. This Plan therefore seeks to translate the higher level objectives within the Core Strategy, into specific affordable housing delivery actions and targets
- 2.2 The Core Strategy provides the basis for achieving a step change in the delivery of affordable housing to enable us to address the significant need for affordable homes identified by the East Kent Housing Market Assessment. However, the Plan has been developed at a time when economic conditions and the future availability of financial resources to support delivery is very uncertain. Consequently, while we know that we will be unable to meet the level of need that has been identified, we believe that by building effective partnerships, taking a creative and innovative approach and continually scanning the horizon for new opportunities, we will be in a stronger position to try and meet the need for affordable housing.

#### 2.3 The Plan considers:

- Why affordable housing is needed
- The number and type of affordable homes required.
- The Council's role in enabling the delivery of affordable housing.
- Our partnership approach to delivering affordable housing.
- The resources available to support delivery.
- 2.4 The Plan will provide a reference document for 'The Single Conversation' which is the new process by which the Homes & Communities Agency will engage with local authorities in a designated area and develop a coordinated approach to investment planning resulting in a Local Investment Plan.

2.4 The Plan will also inform RSLs and developers of our approach to affordable housing delivery so they are fully aware of the Council's expectations in relation to affordable housing when planning new housing schemes.

#### 3. AIMS and OBJECTIVES

#### Aim

3.1 To ensure that as many households as possible who are unable to afford market housing can access good quality, affordable homes.

#### **Objectives**

- 3.2 Our objectives are to
  - 1. Work effectively with partners to increase the supply of affordable homes across the district in support of the Council's wider regeneration and economic development objectives.
  - 2. Ensure that affordable housing positively contributes to attractive, secure and sustainable mixed communities.
  - 3. Deliver a range of affordable homes that will meet the needs of all sections of the community.
  - 4. Ensure that new homes are designed to be as affordable as possible.
  - 5. Make best use of the existing housing stock.
- 3.3 We will achieve these objectives through our Strategic Planning, Strategic Housing and Landlord roles.
- 3.4 An action plan linked to these objectives is attached to the Plan.

# 4. STRATEGIC CONTEXT

#### **National**

4.1 The Government believes everyone should have the opportunity of a decent home, which they can afford, within a sustainable mixed community. This means providing a wide choice of housing to meet the needs of the whole community in terms of tenures and price ranges. This should include affordable housing, both social rented and intermediate<sup>1</sup>.

- 4.2 The Government's 2007 Housing Green Paper, 'Homes for the future, more affordable, more sustainable' called on all Local Authorities to play a stronger role in addressing the housing needs of all residents. It encouraged authorities to develop their strategic housing role by using the full range of housing and land use planning powers to ensure the delivery of new and affordable housing whilst making the best use of existing stock.
- 4.3 Planning Policy Statement 3, published by the Government in 2006, sets out the Government's national policies with regard to planning and the planning policy

<sup>&</sup>lt;sup>1</sup> Communities & Local Government: Delivering Affordable Housing (November 2006)

framework for delivering its housing objectives. It requires Regional Spatial Strategies "to set out the regional approach to addressing affordable housing needs, including the affordable housing target for the region and each housing market area".

- 4.4 It also requires that Local Planning Authorities should:
  - Aim to set an overall target for the amount of affordable housing to be provided based on an assessment of the likely economic viability of land development and likely levels of finance available for affordable housing.
  - Set separate targets for social-rented and intermediate affordable housing.
  - Specify the size and type of affordable housing to be provided.
  - Set out the range of circumstances in which affordable housing will be required.
  - Set out the approach to seeking developer contributions.

#### Regional & Sub Regional

- 4.5 In terms of overall housing growth, the South East Plan sets a target for the provision of 654,000 new homes across the region between 2006-2026 with 56,700 homes to be delivered in the East Kent and Ashford sub region.
- 4.6 The Plan target for Dover District is 10,100 new homes by 2026 an average of 505 homes per annum. The annual average is not a target but is used a benchmark for monitoring progress towards the overall Plan target.
- 4.7 Policy H3 of the Plan states that "a substantial increase in the amount of affordable housing in the region will be delivered".
- 4.8 The importance of affordable housing delivery is also recognised in the South East Regional Housing Strategy which recognises the need to increase the supply of affordable housing across the region "because prices and private sector rents are out of reach of people on low and even average incomes and homelessness remains a significant issue"<sup>2</sup>
- 4.9 The Strategy states that the most acute need is for social rented housing where supply has declined in recent years and that the delivery of new affordable, particularly affordable rented, homes is of over-riding importance.
- 4.10 The Kent Partnership's Community Strategy document 'The Vision for Kent' (2006), states that "Kent will be a county...where housing needs are met and decent, high quality homes, help create attractive safe and friendly communities".
- 4.11 The emerging East Kent Sustainable Community Strategy seeks to ensure that the sub region will be "home to stronger and healthier communities enjoying high quality housing and an enviable quality of life". In achieving this, the Strategy recognises the need for "a balanced housing supply which serves the needs of current and potential residents".

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<sup>&</sup>lt;sup>2</sup> South East Regional Housing Strategy 2006

4.12 The Strategy also recognises that housing affordability is a key issue in terms of access to appropriate housing and fuel poverty.

#### Local

- 4.13 The Council's commitment to providing high quality, sustainable homes can be shown by its successful bid for Growth Point status. Linked to this are ambitious plans to regenerate key parts of Dover town and to create additional employment opportunities. The provision of new housing, including affordable housing, will be essential to help meet the needs of an expanding labour force and will therefore play a key role in helping the Council achieve its economic development objectives.
- 4.14 The Dover Pride Regeneration Strategy, which sets out a 30 year vision, strategy and action plan for the regeneration of Dover, highlights the role that new housing provision can play in helping to "shift, diversify and balance the character of the town and attract new investment". The Strategy recognises that "new house building in Dover has been limited to small scale developments at prices well below national average" and that "Despite the relatively low prices, low levels of earnings in the local economy mean there is insufficient affordable housing in the town". It also highlights the negative impact that the lack of good quality housing in the town has had on inward investment.
- 4.15 The Council's Local Development Framework Core Strategy is a key corporate document which seeks to influence the processes that shape how the district will look and function and the characteristics that make one place distinct from another. The delivery of affordable housing will therefore take place within the policy context set out in the Strategy and support its overall aim and objectives.

#### 5. THE NEED FOR AFFORDABLE HOUSING

- 5.1 A definition of affordable housing is provided in Appendix A.
- 5.2 The Council's strategy for delivering new homes and affordable homes has to be underpinned by a robust analysis of local housing markets and the need for different types of affordable housing to ensure these markets are balanced.

#### **Number of Affordable Homes Needed**

- 5.3 The East Kent Strategic Housing Market Assessment 2009 (SHMA) carried out by ECOTEC, an independent consultant, provides a key evidence base on which our housing related strategies and plans are based.
- The SHMA has identified a need to provide 1,489 new affordable homes per annum in order to meet the backlog of need for affordable housing and newly arising need over a five year period. This is the approach recommended in CLG Guidance but we know that it will be impossible to achieve this level of delivery within this time period.
- 5.5 A summary of the SHMA needs analysis together with some key findings from this and other data sources regarding the affordability of housing in the District and the need for affordable homes are set out in Appendix B.

# **Types of Affordable Housing Needed**

- 5.6 Decisions on the affordable housing to be provided on individual sites will take account of the recommendations in the SHMA report and the approach to unit types and tenure set out in Appendix C of this Plan. However, while this will provide overall direction we will need to allow some flexibility and to consider specific aspects of the site including its location, suitability for certain households, access to transport, schools and other amenities when determining the type of housing to be provided. Through our regular monitoring processes and Plan reviews we will ensure that the overall delivery of affordable house types is consistent with the SHMA report recommendations.
- 5.7 Affordable housing includes various intermediate housing products such as shared ownership, also referred to as HomeBuy. Generally, the SHMA found very low awareness of these intermediate housing products within Dover District with only 1.3% of respondents to the survey having considered them and with no social tenants having considered them at all. Having said this regular monitoring statistics provided by the HomeBuy zone agent (Moat Housing Group) shows that what demand there is, still significantly exceeds supply. Appendix D shows the breakdown of intermediate housing applicants across the County, by local authority area, and while this table is just a snapshot of demand at a particular moment in time, the data is updated on a regular basis and will be used to inform our guidance regarding the type of affordable units to be provided. We also intend to work closely with Moat to develop a better understanding of the intermediate market, identify which parts of the district are in greatest demand for shared ownership and together with our other RSL partners responsibly promote HomeBuy and other intermediate tenures so as to provide choice and meet aspirations.

# **Equality & Diversity**

- 5.8 We will try to make sure that housing is accessible for people with physical disabilities by enabling the development of specialist, wheelchair accessible affordable housing. We will also ensure that homes can be readily adapted to meet changing needs as people grow older, by requiring homes to be built to Lifetime Homes standards wherever this is practically possible.
- 5.9 The SHMA report includes an analysis of the housing requirements of specific groups and this together with the priorities identified in the emerging new Supporting People Strategy, as well as specific local research, will inform our approach to the provision of supported housing to meet the needs of vulnerable households. Two of our immediate priorities in this regard will be the delivery of new supported housing schemes for young homeless people and people with a combined alcohol and substance misuse problem. These are also clear priorities within the emerging new Supporting People Strategy.
- 5.10 We are aware that there is a strong demographic trend nationally, which is also reflected locally, in respect of increasing numbers of older person households (over 65) and of particularly significance is the increasing number of frail older people. In response to this we have also developed a Housing Strategy for Older People 2010-2015.
- 5.11 With regard to the provision of new affordable housing to meet the needs of older people, we will continue to work in partnership with Kent County Council to deliver a second 40 unit 'extra care' scheme through the PFI initiative and will explore further opportunities for the delivery of a further 100 units of extra care housing. In addition, while we recognise that most older people would prefer to remain in their own homes for

5.12 The delivery of an increased proportion of larger, family homes referred to in Appendix C, will help the Council to tackle the problem of overcrowding an issue that was highlighted in the CLG action plan on this topic in 2007<sup>3</sup>. We are aware that overcrowding is a problem that can disproportionately affect black and ethnic minority households.

# Where Affordable Housing Is Needed

- 5.13 As well as assessing the need for affordable housing across the District as a whole, the SHMA identified 4 distinctive local housing market areas (LHMAs) and included an analysis of the need for affordable housing in each area. Of the 21 LHMAs identified by the SHMA within the sub region, the three urban areas within Dover district (Dover town, Deal and Sandwich) were all ranked within the top six areas in terms of the assessed need for affordable housing. The rural part of the district was ranked 11<sup>th</sup>.
- 5.14 While Deal was ranked 2<sup>nd</sup>, in broad numerical terms the SHMA has found that the greatest annual unmet need for affordable housing is in Dover town, followed by Deal, East Kent Rural South (the rural area within Dover District) and Sandwich.
- 5.15 Annex four of the SHMA report sets out the annual unmet need in each LHMA and a breakdown of the type of affordable homes required. In conjunction with other housing needs data this will enable us to give guidance to developers and RSLs regarding the appropriate mix of affordable house types and tenures to be provided within the LHMAs. The findings will also be reflected in the LDF Site Allocations Document.

#### **Rural Housing**

- 5.16 Dover District covers a large rural area which includes a wide range of settlements. It is important that, while we recognise the housing problems affecting the urban areas and Dover town in particular, we also understand and respond to the need for affordable housing in many of our rural settlements.
- 5.17 The Regional Housing Strategy (2006) states that the 'lack of affordable housing in rural communities is believed to be the most important issue threatening the viability of rural communities'.

<sup>&</sup>lt;sup>3</sup> Tackling overcrowding in England: An action plan. CLG Dec 2007.

- 5.18 In 2007 the HCA published its latest Rural Housing Strategy which highlighted the high level of need for affordable housing in many local authority areas and recognised the vital contribution that small, sensitively designed schemes can make to the sustainability of rural communities. This is reflected in the fact that the delivery of affordable rural homes is one of the three geographic priorities identified in the HCA's South East Investment Statement (2008-11). Despite this funding priority it seems likely that there will be shortfall of rural schemes coming forward to enable the HCA to meet its target.
- 5.19 The SHMA identified a significant level of need for affordable housing in the rural part of the district and the report highlighted the lack of suitable development sites, high land costs and land values and environmental considerations as being key factors impacting on the supply and demand for affordable homes. The report also highlighted the impact that the lack of affordable housing can have on the viability of local amenities such as shops, schools and transport networks. As well as on individual households who are forced to move out of villages to find suitable housing elsewhere.
- 5.20 Over the years the Council has enabled the delivery of a number of high quality affordable housing schemes on rural exception sites<sup>4</sup> and has specific planning policy and guidance to support this approach<sup>5</sup>.
- 5.21 We will work closely with Parish Council's and Action with Communities in Rural Kent to enable the identification of suitable sites, assist the Rural Housing Enabler in relation to village needs surveys and provide support to RSLs involved in rural housing development. We understand the need for a properly coordinated and managed approach to rural housing especially where potential schemes are being led by a private developer.
- 5.22 We will also investigate the development of Community Land Trusts as a vehicle that can deliver affordable housing so that it remains a community asset in perpetuity.
- 5.23 Opportunities for the development of rural affordable housing are generally limited and while the affordable homes provided should reflect the need identified through village surveys we will look to see how homes can be designed to offer flexibility in order to meet changing needs. This will be achieved by providing Lifetime Homes, but we will also encourage the provision of homes with easily convertible roof spaces to meet the needs of growing families.
- 5.24 Where there are no suitable sites within a village, but an urgent need for affordable housing has been identified, we will investigate the possibility of enabling an RSL partner to purchase existing, satisfactory properties. These are likely to be former Council homes and the Council may be able to assist with funding through it's 'off site contributions' pot referred to in paragraph 11.2.

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<sup>&</sup>lt;sup>4</sup> Sites that are granted a planning consent as an exception to normal planning policy subject to a requirement that the homes are affordable.

<sup>&</sup>lt;sup>5</sup> Policy DM 6 of the LDF Core Strategy Document 2009 & Affordable Housing Rural Exception Schemes Supplementary Planning Guidance

#### 6. PAST PERFORMANCE

- 6.1 Historic provision of affordable housing in the district has been significantly below the level that will be required in the future by the Council's plans for overall housing growth.
- 6.2 The numbers of new affordable homes delivered in the district over the previous five years is shown below.

	2005/06	2006/07	2007/08	2008/09	2009/10	Total
Social rented	14	35	15	37	82	183
Intermediate rent	0	0	0	6	15	21
Shared ownership (RSL)	12	29	0	23	9	73
Shared ownership (non RSL)	-	-	0	3	4	7
Totals	26	64	15	69	110	284

Source: HSSA returns

While these new affordable homes were being delivered the following homes were lost from the affordable housing stock as a result of Council house sales.

	2005/06	2006/07	2007/08	2008/09	2009/10	Total
Right to Buy sales	27	27	22	5	8	89

Source: CLG live tables on affordable housing supply

- 6.3 The net increase in the total number of affordable homes (including intermediate tenures) over this 5 year period has therefore been 195 homes.
- 6.4 110 new affordable homes were delivered in 2009/2010 which was a significant increase on previous years despite difficult market conditions and just short of our Local Area Agreement target of 120 homes.

#### 7. HOW WE WILL DELIVER THE AFFORDABLE HOUSING REQUIRED

- 7.1 The Council's role in relation to affordable housing is delivered through its responsibilities for:
  - Planning
  - Strategic housing and enabling
  - Council housing

The Council also relies on key partners to help it meet housing need, in particular the Homes & Communities Agency and Registered Social Landlords (RSLs)

- 7.2 The main sources of supply of affordable homes will be:
  - New affordable homes built as part of a larger development under a S.106 planning agreement or developed directly by RSLs on land they control
  - The existing housing stock.

# The Council's Enabling Role

- 7.3 While the Council is the largest provider of affordable housing in the District with a stock of just under 4,600 homes it hasn't built any new affordable homes for many years and this role has been taken over by Registered Social Landlords (Housing Associations).
- 7.4 The Council's role has therefore become one of enabler rather than developer and central to this role is partnership working. Successful implementation of this Plan will be dependent on effective co-ordination and co-operation within the Council and across a number of statutory, non statutory and voluntary organisations.
- 7.5 We already have a protocol for working relationships between Housing and Planning but we will monitor the effectiveness of this and ensure that we have a 'joined up' approach across all parts of the Council involved with affordable housing. As part of this we will look at examples of best practice elsewhere<sup>6</sup>.

# **Partnership Working**

- 7.6 In 2006 Dover District Council together with Canterbury City Council and Thanet District Council selected a small number of RSL development partners with whom the local authorities would develop stronger working relationships in respect of development and management services and who would be promoted to developers for S.106 development opportunities.
- 7.7 The four preferred RSL partners selected were:
  - Amicus Horizon Group
  - Southern Housing Group
  - Orbit Group
  - Town & Country Housing Group
- 7.8 Currently only three of the partners are actively developing general needs affordable housing in the District and this combined with a general scaling back of RSL development programmes raises concern about the capacity of our partners to deliver the amount of affordable housing needed.
- 7.9 We are also aware of the Government's concern that it does not want local authorities to adopt restrictive practices which could preclude innovation and competition between affordable housing providers.<sup>7</sup>

<sup>&</sup>lt;sup>6</sup> The I&DeA publication New Housing Provision and the Strategic Housing Role 2009 provides examples of good practice.

<sup>&</sup>lt;sup>7</sup> Communities & Local Government: "Delivering Affordable Housing – Annex to PPS3 Housing" (2006)

- 7.10 However, we also recognise that Dover town has a poor market image and that there is a need to deliver high quality new homes to counteract this. It is therefore essential that the quality of affordable homes is also of a high standard and it is important that we work with RSL partners who have a clear understanding of the Council's corporate objectives and a long term commitment to the district not only in respect of providing new homes, but also the quality of their post development management services. We will therefore seek to increase RSL development capacity within the district while having a robust process in place to ensure RSLs deliver high quality management services. In identifying potential new partners we will seek to ensure that we there is the range of expertise to help deliver the wide range of different schemes required.
- 7.11 To address the competition issue, we will, for large strategic developments, consider inviting RSLs, or RSL consortia, to submit competitive proposals for their selection as the preferred RSL partner(s). Proposals would be assessed against a range of criteria including grant requirement, design standards and achieving sustainable communities. This would help build a strategic partnership approach to delivery and establish a long-term commitment from the RSL partner(s) and HCA. This approach may also be applied to major regeneration projects where a close partnership working and engagement with the community is necessary e.g. Coombe Valley in Dover town.
- 7.12 These strategic developments should provide RSL partners with an attractive business development opportunity and in return we will expect RSLs to demonstrate a willingness to help deliver more challenging, higher risk schemes.
- 7.13 We are aware of effective partnerships operating elsewhere which have enabled the delivery of an increased number of affordable rural homes. For example, the Rural Housing Partnership operating in Oxfordshire, is significantly out performing other County areas in the South East. This partnership comprises four district authorities and selected RSL, developer and consultant partners who have an expertise in relation to affordable housing. This is an approach we will explore with our East Kent local authority partners.

#### **Other Partners**

- 7.14 In addition to the preferred RSL development partners we work with a range of other organisations to enable the delivery of affordable housing. These include:
  - **English Rural Housing Association**: An RSL partner specialising in the provision of affordable homes in rural communities.
  - Action with Communities in Rural Kent: An independent voluntary organisation that works with rural community organisations on a range of projects, including village housing need assessments.
  - Moat: An RSL that operates the HomeBuy Zone Agency.
  - Brownfield Land Assembly Company: Supported by the Regional Housing Board and funded by the HCA, BLAC are a not for profit organisation which invests in small brownfield sites in urban areas which would not otherwise come forward for redevelopment due to uncertainty of the cost of remediation. The sites are remediated, planning consent obtained and then sold to an RSL partner. Receipts are recycled into further site purchases. BLAC are often able to purchase and bring forward sites which would be seen as high risk by other developers and RSLs.

7.15 Private developers are also able to secure public subsidy so that they can provide new affordable housing directly themselves. Once built, the developer normally transfers homes to an RSL. Where this approach is proposed we will work closely with the developer to ensure that the right type of homes are provided and influence the choice of RSL management partner.

# **Local Authority Partners**

- 7.16 The Council recognises the benefits of working with neighbouring authorities to address common issues, share good practice and make best use of resources. We therefore regularly participate in a number of cross authority forums and working groups. Those with a specific affordable housing focus include:
  - Kent Housing Officers Group and the Strategy & Enabling Sub Group
  - East Kent Triangle RSL Forum

# Affordable Housing Working Group (AHWG)

- 7.17 This is the partnership body set up by the Council to address affordable housing issues and monitor the delivery of affordable housing. The Group is Chaired by the Council's portfolio holder for Strategic Housing and attended by other Council members, officers, HCA and RSL representatives and representatives from those organisations referred to at 7.14.
- 7.18 In addition to its monitoring role the AHWG will encourage the sharing of good practice and develop local standards to be achieved in relation to development and management services.
- 7.19 We recognise the need to have good market intelligence to help deliver and the Plan and respond to changing circumstances. We will therefore look at how the AHWG can help provide this and we will look at expanding representation on the Group to include developers and land agents.

#### 8. DELIVERING NEW AFFORDABLE HOMES

- 8.1 While this Plan sets out our approach to the delivery of affordable housing over the next five years we recognise the longer term context within which the provision of affordable housing in the district should be considered.
- 8.2 As mentioned above, the South East Plan includes a target for the delivery of an additional 10,100 homes in Dover District over the period 2006- 2026. The Plan recommends that 30% of these new homes should be affordable and therefore suggests that we should be aiming to deliver in the region of 150 homes new affordable homes per annum.
- 8.3 The Council's aim is to secure a higher level of housing growth than set out in the South East Plan and the Local Development Framework (LDF) Core Strategy Document includes a commitment to a high growth strategy which would see the provision of 14,000 new homes with a minimum of 10,100 being delivered by 2026. This will provide the opportunity to deliver a significant amount of new affordable housing in the future and help reduce the backlog of need. While most of this additional housing will be

delivered beyond the life of this Plan it is important to highlight the opportunities that will exist in the future to address the need for affordable housing.

8.4 The Core Strategy Document forecasts a progressive build-up of housing development which would reach maximum delivery during the period 2016-2021 and starting to tail off during 2021-2026. The projected housing delivery set out in the Strategy indicates that there is potential for the delivery of 3,027 new homes over the period 2010/11-2014/15. This indicates that there is the potential for the planning system to deliver 908 affordable homes over this same period (181 per annum). However, not all of these will be above the planning threshold which triggers the requirement for affordable housing.

#### **Delivery via S.106 Sites**

- 8.5 Over recent years, sites where there is a planning requirement to provide affordable housing, have become the most important supply stream of affordable homes for most local authorities.
- 8.6 Policy DM 5 of the Council's Core Strategy states that...

"The Council will seek applications for residential developments of 15 or more dwellings to provide 30% of the total homes proposed as affordable homes, in home types that will address prioritized need, and for developments between 5 and 14 homes to make a contribution towards the provision of affordable housing. Affordable housing should be provided on the application site except in relation to developments of 5 to 14 dwellings which may provide either on-site affordable housing or a broadly equivalent financial contribution, or a combination of both. The exact amount of affordable housing, or financial contribution, to be delivered from any specific scheme will be determined by economic viability having regard to individual site and market conditions".

More detailed guidance on how this policy will be implemented is provided in the Council's Affordable Housing Supplementary Planning Document.

8.7 There are four strategic development sites identified in the Core Strategy that are of a scale and significance that they are key to delivering the South East Plan target. They will also be key to the delivery of additional affordable homes in the District over a period which extends beyond the life of this Plan. These sites together with the potential number of affordable homes they could deliver based on Policy DM5 are shown below.

Site	Total New	Affordable %	Potential No.	Timescale
	Homes		Affordable Homes	
Dover Waterfront	300	30%	90	2011-2016
Mid Town	100	30%	30	2011-2016
Connaught	500	30%	150	2011-2016
Barracks				
Whitfield	5,750	30%	1,725	2016-2026
Expansion				

8.8 While the Council can enable and facilitate these larger developments, it requires developers to deliver them and consequently, economic considerations will influence the development timescale. Current market uncertainties therefore make it difficult to

- 8.9 The graph in Appendix E shows the total potential affordable housing delivery via S.106 sites, assuming 30% provision, for the period up to 2016 and how it relates to the projected average delivery based on the South East Plan. It also shows previous performance and clearly illustrates the step change in delivery that is required to meet identified need but also the potential that we have over the period to 2026 for increased delivery. However, what is also evident is that even if we deliver the maximum number of affordable homes on S.106 sites we will still fall short of the number of homes that the SHMA has identified.
- 8.10 In recognition of the substantial need for affordable housing and to equitably apply the requirement for affordable housing, the LDF Core Strategy Document includes a requirement for residential development below the 15 unit threshold to make a financial contribution towards the provision of affordable housing. The intention is to pool these contributions and, in partnership with RSLs, fund other affordable housing schemes in the district.

# **Economic Viability**

- 8.11 This Plan has been developed at a time when, although there is some evidence that the housing market has stabilised, conditions are still difficult and the future uncertain. Because S.106 sites are private developer led, the delivery of affordable homes through this route depends heavily on the buoyancy of the housing market. Nevertheless, it is important that our plans not only take account of current conditions but will place us in a strong position to benefit from the recovery.
- 8.12 Consultation with local developer, land agent and RSL stakeholders has highlighted the economic viability of residential development being a key issue in many parts of the district. Brownfield sites where there are higher development costs related to site clearance, remediation of contaminated land and flood mitigation are particularly marginal in terms of viability due to relatively low sale values. They advise that for many of these sites it can be difficult to generate a land value in excess of the site's existing use value. A requirement to provide a proportion of affordable homes will also impact on viability depending on whether or not the affordable homes are subsidised with grant funding.
- 8.13 Reference has already been made in paragraph 8.4 to the fact that in order to deliver affordable housing some form of subsidy is needed. The Council recognises that public subsidy in the form of Social Housing Grant is limited and that on "suitable" sites it

should be possible to deliver affordable housing without grant and still achieve a realistic land value. Developers should therefore "take affordable (housing) provision and other known requirements and constraints into account when negotiating the purchase of land".8

- 8.14 However, it is also recognised that there will be sites where property prices, land values and development costs will be such that grant funding will be essential to achieve an economically viable development which will deliver the percentage of affordable housing required.
- 8.15 The economic viability of providing affordable housing on a range of different sites within the District has been the subject of analysis by consultants CBRE. The study found that currently the relatively low sales values in Dover town and Deal means that social housing grant will be necessary in order to achieve a realistic land value and ensure viability of the development. The analysis of local housing markets in the SHMA suggests that approximately 67% of the unmet need for affordable housing is in Deal (28%) and Dover town (39%).
- 8.16 Consultation feedback has reinforced the findings of the CBRE study with developers, in particular, highlighting the fact that low relatively sales values means that the economic viability of many sites in the District is marginal. Consequently, they are of the view that, given current market conditions, providing 30% affordable housing on such sites, without social housing grant, would make them financially unviable.
- 8.17 While the preferred affordable housing tenure mix is set out in paragraph 3.4 the Council recognises that current housing market difficulties have resulted in a substantial reduction in the provision of shared ownership homes and that while other intermediate tenures are being provided, the higher level of grant funding for rented homes may mean that some schemes are only viable where the percentage of homes for rent is increased. While current conditions may require a degree of flexibility to prevent schemes stalling we will be very mindful of the need to ensure that new communities are balanced and sustainable.
- 8.18 Although economic viability may be a justifiable reason for developers seeking a reduction in S.106 contributions (especially affordable housing), on some sites, it will be necessary to robustly test the financial assumptions behind any developer request to reduce the proportion of affordable housing. It will also be necessary to develop mechanisms for calculating the financial contribution to be made for affordable housing on sites below the 15 unit threshold and determine a process by which any requests to reduce contributions on viability grounds should be tested. While this policy could be extremely beneficial in terms of providing additional resources to deliver more affordable housing and support other corporate objectives, there are also significant implications in respect of the staff and financial resources that may be required to implement it.

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<sup>&</sup>lt;sup>8</sup> Affordable Housing Supplementary Planning Document 2007 (Paragraph 5.32)

# **Direct Provision by RSLs**

- 8.19 The acquisition and direct development of sites is regarded by some RSLs as preferable to the acquisition of homes via developer led S.106 sites. This is because they control the development timescale and the design and quality of the homes.
- 8.20 RSLs normally find it difficult to compete with private developers for land in a buoyant market. The current market may appear to offer opportunities but the reality is that they have also been affected by the 'Credit Crunch' through more expensive borrowing and a dramatic fall in shared ownership sales.
- 8.21 Relatively low house values also impact on the rents RSLs are able to charge for new affordable homes and, while this helps make them affordable, it affects the amount that RSLs can borrow against the future rental income stream and therefore the financial viability of RSL led development. This, combined with shared ownership issues referred to above, means that, without some form of subsidy, RSLs are continuing to find it difficult to generate land values that enable them to secure sites.

# Ensuring New Homes Are Well Designed and Contribute to Safe, Sustainable Mixed Communities

- 8.21 Through our enabling role we will ensure that new affordable housing is of a high quality, built in places where people want to live, effectively managed and consequently contributes to the development of cohesive and sustainable communities.
- 8.22 Through close partnership working with RSL partners, the use of letting plans and encouraging their active participation in community consultation and development we will help build balanced communities that will remain attractive places to live in years to come.
- 8.23 Where affordable housing is delivered as part of a larger housing development we will ensure that new affordable housing includes an appropriate mix of tenures and is evenly distributed across sites with a view to making it indistinguishable from market housing (tenure blind). We will therefore encourage developers to work with RSLs on the design of schemes at an early stage. Our proposed approach to RSL partner selection for larger S.106 schemes, as set out in 7.11, will help achieve this.
- 8.24 We expect our partner RSLs to share good practice, learn from, and build upon the high quality of design achieved on other affordable schemes in the district and assist in delivering new exemplar schemes.
- 8.25 We will expect all new affordable housing to meet the requirements of the HCA's Design & Quality Standards (2007) and meet the requirements of the Code for Sustainable Homes in order to qualify for HCA grant funding (Code Level 3 until 2011). However we will work with RSL partners to try and achieve higher Code Levels where it is economically viable. Our aim will be to deliver our first Code level 5 scheme within the first 3 years of the Plan.

- 8.26 We will also expect RSLs to design schemes with a view to achieving at least 16 out of the 20 'Building for Life' criteria which exceeds the current minimum standard of 14.
- 8.27 The Council will aim to ensure that affordable housing schemes provide a safe and secure environment for households by encouraging RSL partners to work towards achieving 'Secure by Design' accreditation.
- 8.28 We will only work with RSL partners who can demonstrate that they provide high quality housing management services, have effective procedures for tackling anti social behaviour and can make a positive contribution to the development of sustainable communities.
- 8.29 We will also seek to ensure long term affordability of homes by working with RSL partners and developers to design schemes that minimise household running costs, tackle fuel poverty and minimise service charges.
- 8.30 We will develop monitoring arrangements with our RSL partners to ensure that the affordable homes being delivered meet the standards required. This will help us learn from mistakes, refine our guidance and identify and share good practice.

#### 9. DELIVERY TARGET FOR NEW AFFORDABLE HOUSING

- 9.1 The Kent Partnership (the county-wide local strategic partnership for Kent) has developed a target for the delivery of new affordable homes and this is set out in Kent Agreement 2 (2008-11). This is a cumulative target based on individual local authority targets for this period. Dover's target for this period is 120 new affordable homes per annum and reflects the target within the 2005-2009 Housing Strategy.
- 9.2 We have only narrowly missed our KA2 target for 2009/10 but we think there is likely to be a shortfall for 2010/11 of about 70 units. The position appears more positive from 2011/12 onwards but forecasting with any certainty is extremely difficult given current market conditions.
- 9.3 We know it isn't realistic to expect that we can deliver the number of affordable homes required to meet the total need identified by the SHMA, both in terms of the projected development opportunities and the resources likely to be available. However, we also recognise the need to improve our performance and, subject to the necessary resources being available, we will be aiming to deliver at least an additional 250 affordable homes over the first two years of the Plan. The schemes we are forecasting for delivery over this period together with the indicative grant funding requirement are shown below. Forecasting future affordable housing development is not straightforward especially given uncertainties within the housing market and future funding. Therefore, while we are optimistic that these schemes can be delivered within the timescale, this can't be

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<sup>&</sup>lt;sup>9</sup> A scheme promoted by CABE and Home Builders Federation which sets out 20 design criteria and a process for assessing schemes against the criteria.

guaranteed and consequently the target will need to be regularly reviewed. Inevitably, some schemes may, for various reasons drop out of the programme, but there is also the likelihood that new schemes will come forward. In addition to these specific schemes we anticipate that there may be a number of HomeBuy purchases.

2010/2011								
Scheme	Location	No. Affordable Homes	Grant Requirement					
Magnus House	Deal	14	£880,000					
College Road	Deal	16	£1,040,000					
Northwall Road	Deal	4	£260,000					
Eastry Hospital	Rural	12	£800,000					
·		46	£2,980,000					

2011/2012								
Scheme	Location	No. Affordable Homes	Grant Requirement					
Astor Avenue	Dover	59	£ 2,204,608					
Anselm Road	Dover	8	£600,000					
Westmount School	Dover	25	£1,625,000					
Extra Care (PFI)	Dover	40	£0*					
Maison Dieu Road	Dover	40	£3,600,000					
Aylesham (Phase	5 .		00.040.000					
1)	Rural	38	£2,640,000					
Goodnestone	Rural	8	£500,000					
		218	£11,169,608					

- 9.4 Our longer term target will be to deliver a further 400 affordable homes over the remaining three years of the Plan and this should include the early phases of some of the strategic developments identified at 8.7. Clearly this will be subject to developers bringing forward identified sites and again, the necessary resources to deliver the affordable homes. The resource implication of these targets is considered in paragraph 11.7. Beyond the life of this Plan and up to 2026 we believe that there will be the potential to increase average annual delivery to around 150 new affordable homes per annum. This is based on estimated delivery via S.106 sites and doesn't include additional sources of supply.
- 9.5 Because it is not possible to forecast housing delivery with any certainty we will as mentioned previously, regularly review the targets, not only to identify potential slippage, but also to identify new opportunities for increasing delivery.

<sup>\*</sup> The extra care scheme will be funded from PFI credits through the Excellent Homes for All PFI programme and therefore there will be no requirement for social housing grant.

#### 10. MAKING BEST USE OF THE EXISTING HOUSING STOCK

10.1 In addition to building new affordable homes we recognise the need to look at how we can make better use of the existing private sector and social housing stock within the district

#### **Private Sector Stock**

- 10.2 Our Private Sector Housing Strategy identifies the need to tackle the problem of long term empty homes (empty 6 months or more) as one of its priorities for action. A Private Sector House Condition Survey carried out in the District in 2008 found the rate of long term empty properties in the private sector was 2.1% (870 properties). This is significantly higher than the national rate of 1.6% and is the second highest in Kent. These homes represent a wasted resource.
- 10.3 While our primary focus will be to bring long term empty homes back into use there may be scope to make some available as affordable homes and specific actions related to this are set out in our Empty Homes Strategy.
- 10.4 We also recognise that the private rented housing stock in the district (14.9% of the total housing stock) can make a valuable contribution to the supply of affordable homes and often helps to meet the needs of homeless single people whom the Council does not have a legal duty to house. .
- 10.5 Consultation feedback has highlighted a ready supply of private rented housing in Dover town at present, although access can be restricted to certain groups of people. We currently assist people in housing need access private rented housing through schemes such as the Rent Deposit Guarantee Scheme and Private Sector Leasing Scheme and we will continue to explore other ways in which private sector housing can help meet housing need while working to improve standards in this sector.

# **Social Housing Stock**

10.6 The Council and a number of RSL currently own and manage a range of affordable housing across the district. The existing stock of social rented homes broken down by number of bedrooms is shown in the table below:

	Bedsit	I Bed	2 Bed	3 Bed	4 Bed	5 Bed	6 or more	Total
Dover DC	140	946	1937	1497	72	2	0	4594
RSLs	17	293	651	509	26	0	1	1497
Total	157	1239	2588	2006	98	2	1	6091

10.7 From this stock there is a regular supply of Council and RSL homes that become vacant and available for re let. The number homes re let in the period 2004/05 to 2008/09 is shown below.

	2004/05	2005/06	2006/07	2007/08	2008/09
Council	366	244	285	218	140
RSL	183	256	227	215	206
Total	549	500	512	433	346

Source: CORE Lettings Data

- 10.8 This shows that over the past five years there has been a steady reduction in the number of Council homes becoming available for re let.
- 10.9 A recent Housing Quality Network briefing "What does excellence look like? Allocations and lettings" highlights the approach taken by organisations to address under-occupation as a key area that will be assessed as part of any Audit Commission inspection. This has been followed by a report published by the South East England Partnership Board which restates the need for more family sized (3 & 4 bedroom homes) and recommends that local authorities should be looking at the needs of under occupying older households with a view to making best use of the available stock. As part of the forthcoming review of our Allocations Policy we will look at examples of best practice in relation to reducing under occupation.
- 10.10 In addition, our Housing Strategy for Older People 2010-2015 considers how we can provide attractive housing options for older people which will enable us not only to meet their housing needs but also potentially 'free up' family housing.
- 10.11 We will be working with the other East Kent authorities to develop a better understanding of the issue and explore potential actions to reduce under occupation.
- 10.12 There may also be opportunities to 'free up' social housing and meet tenant's aspirations through the provision of affordable home ownership options.

#### 11. RESOURCES

11.1 A range of resources will be required to deliver the Plan objectives, both financial and staff.

# **Grant Funding (National Affordable Housing Programme (NAHP))**

- 11.2 The NAHP is the main source of capital funding to support the delivery of affordable homes. Funding is provided by Government and the programme is managed by the HCA through their various regional teams. The investment priorities for the region are set out in their South East Investment Statement 2008-11.
- 11.3 The geographic investment priorities in the Statement are:
  - Rural affordable housing
  - Growth Areas
  - Growth Points
- 11.4 The thematic priorities are:
  - Supported housing
  - Larger homes
  - Meeting the needs of BME communities

<sup>&</sup>lt;sup>10</sup> Releasing Larger Social Rented Homes in the South East; meeting the needs of older people and families (2009): Regional Housing Forum

- Design & quality
- Affordability of low cost home ownership
- 11.5 At this point in time it is extremely difficult to predict what funding may be available via the HCA in the future and as previously mentioned, we will need to regularly review the Plan in the light of funding availability and changes to HCA strategic priorities. However, many of the HCA's current priorities are reflected in this Plan and this should help ensure we maximise the potential for bids being approved.
- 11.6 The HCA has an expectation that bids for grant funding will be subject to economic viability testing and that the need for grant funding can be clearly demonstrated. The district wide viability assessments carried by CBRE indicate that the vast majority of sites coming forward in Dover and Deal are likely to require grant funding to achieve viability. These are the same areas where there is greatest unmet need. The schemes identified to help us achieve our delivery target of 250 new affordable homes over the next 2 years will, on the basis of the CBRE analysis, all require grant funding. We also anticipate that many of the schemes likely to come forward over the life of the Plan and help deliver the 650 new homes target, will also require grant.
- 11.7 However, as previously referred to, our longer term aim is to improve the housing market image in these areas and this combined with a general housing market recovery, the impact of key regeneration schemes and the high speed rail link should have an impact on house values and help to deliver affordable housing with reduced grant. The Communities and Local Government document 'Delivering Affordable Housing' (2006) recognised that where housing commands much higher prices there is greater scope for securing affordable housing through developer contributions or "planning obligations".
- 11.8 Our minimum estimated grant funding requirement to meet our 2 year target is approximately £16m with an estimated further £23m required to deliver the target for the remaining 3 years. This has been calculated using regional average grant per unit figures for rented and shared ownership units but given market conditions, higher than average levels of grant may be required to achieve financial viability on some sites over the short term. However, we recognise the uncertainty regarding future grant funding and as explained above, our medium to long term aim will be to balance our local housing markets so that as general market conditions and sales values improve, these factors combined with a more stable shared ownership market, should improve the value for grant position.
- 11.9 We believe that we will be able to make a strong case to the Homes & Communities Agency, through the Single Conversation, for the required level of investment. We can clearly demonstrate the significant level of need for affordable housing that exists and that we have well advanced plans to deliver housing growth including affordable homes. We can also demonstrate that currently the majority of affordable housing development opportunities are currently unviable without grant funding.
- 11.10 We recognise that the future availability of grant funding is uncertain and therefore, given our longer term aim set out above, we will ensure that affordable housing which forms part of a development with a regeneration or economic development focus, is identified as high priority for grant funding.

# Planning Policy – Financial Contributions from Developers

- 11.11 From time to time the Council may receive commuted sums for the off-site provision of affordable housing especially as we will be seeking contributions on sites below the 15 unit threshold.
- 11.12 We will explore various schemes through which this money can be spent including:
  - The funding of known affordable housing schemes where HCA funding is not available.
  - The joint funding of schemes where this will help to lever in the required investment to deliver affordable housing
  - The acquisition of land for the development of affordable housing
  - The acquisition of existing satisfactory dwellings (ESDs) targeted at specific property types or areas e.g. villages where there are no opportunities for new development, areas of poor quality housing or with a high proportion of empty properties where the acquisition and improvement of homes may help lever in private investment and create a more balanced market

#### Land

- 11.13 The Council owns land which may be suitable for residential development and the provision of affordable housing. We will carry out a site identification exercise to identify all HRA owned sites and assess their development suitability.
- 11.14 The Council can make this land available for less than market value to facilitate the provision of affordable housing. This would enable the Council to demonstrate a level of strategic commitment to a high priority scheme thereby increasing its priority for HCA funding. However, such an approach would have to be weighed up against the impact the reduced capital receipt may have on other aspects of the Council's business.
- 11.15 Another approach might be to sell sites at market value but conditional on a higher percentage of affordable housing being provided. Again this is likely to reduce the value of the land and careful consideration would have to be given to achieving an appropriate balance of tenures.
- 11.16 Some land (small sites in low value areas) may have not be attractive to private developers and may only have a relatively low value. They may however, be of interest to an RSL partner although the scale of the development may present viability issues. Following completion of the site identification and assessment process referred to above we will consider whether or not there is scope to package these sites in such a way that would make them attractive to an RSL partner.
- 11.17 An alternative option is to explore opportunities such as the Local Authority New Build programme by which the Council could develop such sites directly, with an RSL acting as its development agent. Although the Council wouldn't receive a capital receipt it would benefit from the long-term rental income stream.
- 11.18 In addition to vacant sites the Council will look at potential opportunities to re develop existing housing where it is possible to increase the housing density and where this will result in the provision of higher quality homes of the right type and a more balanced community.

#### **Private Finance Initiative**

11.19 The Council is one of 10 district authorities involved in a partnership with Kent County Council to build affordable homes via a Private Sector Finance Initiative project know as 'Better Homes Active Lives'. Housing 21 has been commissioned by the partnership to provide across the County 275 extra care apartments for older people, 58 supported flats for people with a learning disability and seven for people with mental health problems. The project has already delivered 40 affordable extra care flats and 7 flats for people with a learning disability in Dover. The next phase of the project will deliver a further 40 extra care flats. We will continue to work with partners on PFI initiatives where they can help meet housing needs and demonstrate value for money.

#### 12. IMPLEMENTATION AND MONITORING

- 12.1 An Action Plan linked to this document is attached and progress against the actions will be monitored on a regular basis with monitoring reports submitted to quarterly meetings of the Affordable Housing Working Group.
- 12.2 An annual review of the Plan and Action Plan will also be carried out, including a review of the affordable housing targets referred to at 9.3 and 9.4.
- 12.3 Progress on schemes will also be monitored through individual bi monthly meetings with RSL partners.

# AFFORDABLE HOUSING DELIVERY - ACTION PLAN

	Action	Outcome	Target	By When	Resources Required	Lead					
1. C	1. Objective: Work with Partners to Increase the supply of affordable homes										
1.1	Enable the delivery of new affordable housing	Meeting housing need, reduced housing waiting list and homelessness	250 new affordable homes delivered 650 new affordable homes	March 2012 March 2015	HCA grant funding	Housing Initiatives Manager					
1.2	Coordinated corporate approach to negotiation of affordable housing provision on S.106 sites	Developers aware of Council policy on affordable housing and therefore less scope for disputes	30% affordable housing achieved unless proven economic viability reasons for reduced %	Effective from July 2010 and then every year	Officer time Consultancy costs re viability assessment	Housing Initiatives Manager					
1.3	Increase the number of RSL development partners	Increased affordable housing development capacity, competition and ability to share risk	Develop new process for RSL partner accreditation. At least 2 additional RSL partners active in the district	December 2010	Officer time	Housing Initiatives Manager					
1.4	Produce a portfolio of HRA owned land with development potential	Additional potential affordable housing land identified	Portfolio produced and development potential and financial implications assessed	July 2010	Officer time	Senior Valuer/ Housing Initiatives Manager					
1.5	Explore initiatives that will enable the delivery of new rural affordable homes	Affordable housing need in rural communities addressed	Consider the possible development of an East Kent rural affordable housing partnership.	April 2012	Officer time	Housing Initiatives Manager					
			Investigate potential development of the Community Land Trust model	April 2012							

	Action	Outcome	Target	By When	Resources Required	Lead			
1.6	Work with the Rural Housing Enabler to promote affordable rural housing and develop managed programme	Rural housing opportunities identified and brought forward	Programme for 2 village needs surveys per annum	Effective from January 2011 and then every year	Officer time/RHE financial contribution	Housing Initiatives Manager/ RHE			
1.7	Develop a planned approach to the delivery of affordable rural housing	Affordable housing need in rural communities addressed	2 new rural schemes per annum	April 2011 and then every year	HCA grant funding	Housing Initiatives Manager			
1.8	Utilise 'off site' developer financial contributions	Increased provision of affordable homes	Possible schemes identified, appraised and reported to AHWG	October 2010	Officer/RSL time HCA grant funding	Housing Initiatives Manager/Development Control Manager			
1.9	Actively monitor the progress of schemes and facilitate their development	Closer partnership working and greater certainty of delivery	Bi monthly 1-2-1 meetings with all RSL partners and quarterly meetings of the AHWG	July 2010	Officer/RSL time	Housing Initiatives Manager			
1.10	Update the evidence bases which support the delivery of affordable housing	Types and tenure of homes delivered which meet local need. Strengthened position in terms of S.106 negotiations and funding bids	SHMA updated  Analysis of the demand for intermediate housing within the district	April 2014 August 2010	Cost shared across EK LAs. Estimated cost £15,000	Housing Initiatives Manager/Forward Planning Manager  Housing Initiatives Manager/Moat Housing Group			
2. C	2. Objective: Ensure that affordable housing positively contributes to attractive, secure and sustainable mixed communities								
2.1	Affordable housing is well integrated within a mixed community	Social inclusion and sustainable communities	Develop a process for the selection of partner RSLs for strategic sites	December 2010	Officer/HCA time	Housing Initiatives Manager			

	Action	Outcome	Target	By When	Resources Required	Lead
2.2	All new schemes to contribute to achieving a balanced community	Overall provision of new homes will accurately reflect the type, size and tenure specified in the Plan	Regular monitoring report prepared and reported to AHWG	Effective from July 2010 and then every year	Officer/RSL time	Housing Initiatives Manager
	New affordable homes and neighbourhoods to be well designed	Improved social well being, quality of life and sustainable communities	All new affordable homes to achieve 16 out of 20 'Building for Life' score	Effective from July 2010 and then every year	Officer/RSL time	RSL partners
	Enable the development of safe & secure neighbourhoods	Reduced crime and fear of crime	All new schemes to achieve 'secure by design' accreditation	Effective from July 2010 and then every year	RSL	RSL partners
	Assess levels of customer satisfaction with new affordable housing	Better understanding of occupiers needs, best practice shared and improved design	Customer satisfaction monitoring process developed and reported to AHWG	April 2011	Officer/RSL time	Housing Initiatives Manager/RSL partners
		ange of affordable homes			s of the commun	
3.1	Ensure all new affordable homes are designed to be flexible to the changing needs of occupiers	Reduced need for transfers and reduced DFG/adaptation costs	<ul> <li>All new affordable homes to meet the Lifetime Homes Standard where practically achievable</li> </ul>	Effective from July 2010 and then every year		RSL partners
			<ul> <li>Where practical and financially viable, new affordable rural homes to include convertible roof spaces</li> </ul>	Effective from July 2011 and then every year		

	Action	Outcome	Target	By When	Resources	Lead
3.2	Enable the development of new housing that meets the needs of physically	Reduced waiting times for transfers to suitable accommodation and reduced DFG costs	Deliver 4 wheelchair standard units per annum	Effective from July 2010 and then every year	Required HCA grant funding	Housing Initiatives Manager/RSL partners
3.3	Enable people  Enable new supported housing provision that will meet the needs of other vulnerable groups	More balanced and socially inclusive communities	<ul> <li>Deliver a dual diagnosis scheme for people with a mental health/substance misuse problem</li> <li>Deliver 2 schemes for people with mental health needs</li> <li>Deliver 2 schemes to meet the needs of young homeless people</li> <li>Deliver 40 unit extra care scheme</li> </ul>	April 2011 & April 2015 December 2011 April 2012	HCA grant funding  HCA, KCC and Supporting People funding HCA and Supporting People funding People funding	Housing Initiatives Manager/RSL partners  KCC/Housing Initiatives Manager
4. C	biective: Ensure that	at homes are designed to		sible		
_	Ensure new homes are cheap to run with low carbon emissions	Homes that will remain affordable for people on low incomes	Where financially viable new affordable housing schemes to achieve Code Level 4.	Effective from July 2010 and then every year		RSL partners
4.2	Minimise service charges by influencing the design of schemes	Homes that will remain affordable for people on low incomes	No unreasonably high service charges	Effective from July 2010	Officer/RSL time	Housing Initiatives Manager/RSL partners
5. C	bjective: Make best	use of the existing hous				
5.1	Revised allocations policy giving additional priority to under occupying households.	Increased number of family homes becoming available for re letting. Reduced housing waiting list and overcrowding	Revised allocations policy in place			Housing Initiatives Manager/Housing Needs Manager

	Action	Outcome	Target	By When	Resources Required	Lead
5.2	Increase housing options for older people	Affordable family homes released	In partnership with KCC, deliver PFI Extra care scheme. At least 50% of homes in any new older persons schemes to be 2 bedroom.	April 2012  Effective from July 2010	PFI funding	Housing Initiatives Manager
5.3	Increase the options and pathways available for people with a housing need to access the private rented sector	Reduced housing waiting list and homelessness	Identify best practice and develop potential schemes	April 2012	Officer time	Housing Initiatives Manager/Housing Needs Manager

#### APPENDIX A - WHAT IS AFFORDABLE HOUSING

Affordable Housing is defined in the Government's Planning Policy 3 (PPS3): Housing document as follows:

'Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should:

- Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices.
- Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision'.

Affordable housing is essentially housing for people who can't afford to buy or rent a home in the local market. Therefore an affordable home is one where the cost has been reduced below market rates.

Affordable housing includes social rented housing and intermediate affordable housing.

PPS3 defines these in the following way:

# Social rented housing is:

'Rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. The proposals set out in the Three Year Review of Rent Restructuring (July 2004) were implemented as policy in April 2006. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant'.

#### Intermediate affordable housing is:

'Housing at prices and rents above those of social rent, but below market prices or rents, and which meet the criteria set out above. These can include shared equity products (eg HomeBuy), other low cost homes for sale and intermediate rent'.

The definition does not exclude homes provided by private sector bodies or provided without grant funding. Where such homes meet the definition above, they may be considered for planning purposes, as affordable housing.

The Council's affordable Housing Supplementary Document (2007) also provides a definition of affordable housing within the context of Dover district.

#### APPENDIX B - HOUSING AFFORDABILITY AND HOUSING NEED

#### **AFFORDABILITY**

#### **Market House Prices & Rent Levels**

House prices in England have increased significantly over recent years and this has been mirrored in East Kent and Dover District. The mean house price increases in the District over this period are shown in the table below.

	2001	2007	% Increase
Detached	165,878	316,072	91%
Flat	60,694	129,249	113%
Semi	92,351	190,713	107%
Terraced	73,489	162,925	122%
Average	97,010	194,936	101%

Source: Strategic Housing Market Assessment Report 2009

As house prices have increased so have weekly rents in the private sector. The following table shows minimum, maximum and average weekly rents charged for different sized homes in Dover District in 2008.

	Ave	Min	Max
1 bed	£85	£65	£125
2 bed	£115	£85	£165
3 bed	£140	£120	£205
4 bed	-	£155	-
5 bed	£230	£195	£300

Source: Strategic Housing Market Assessment Report 2009

#### Market Housing Affordability

The Strategic Housing Market Assessment Report 2009 highlights the problem of housing affordability generally within the East Kent Sub-region.

The mean, median, lower and upper quartile household incomes in Dover District in 2007 were:

Mean: £32,049 Median: £27.445

Lower Quartile: £17,181 Upper Quartile: £41,676

The Government's SHMA guidance recommends that for a market home to be affordable, it should cost no more than 3.5 times the gross household income. The SHMA found that in Dover a home in the lower quartile price range cost over seven times a lower quartile income.

As regards private renting, a household is considered to be able to afford a market rented home where the rent payable doesn't exceed 25% of their gross household income.

The SHMA found that this was an unaffordable option for those households with lower quartile incomes but was affordable for households with higher incomes.

#### THE NEED FOR AFFORDABLE HOMES

Planning Policy Statement 3 (PPS3) defines housing need as 'the quantity of housing required for households who are unable to access suitable housing without financial assistance'. Further to this PPS3 Annex B states that...'Affordable housing includes social rented and intermediate housing provided to specified eligible households whose needs are not met by the market'.

It is expected that affordable housing should:

- Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices; and
- Include provision for the home to be retained for future eligible households: or if these restrictions are lifted for any subsidy to be recycled for alternative affordable housing provision.

The assessment of housing need is a key component of the East Kent Strategic Housing Market Assessment. The study followed Government guidance in respect of the methodology used to calculate the need for affordable housing over the period 2006-2010.

The formula used was:

**Reduction of Gross Backlog Need** 

**Plus** 

**Gross Annual Newly Arising Need** 

Minus

**Gross Supply of Affordable Housing** 

**Equals** 

# **Net Annual Housing Need**

Households are considered to be able to afford to buy a home if it costs 3.5x the gross household income for a single earner or 2.9x the gross household income for dual-income households. With regard to private renting, a household can be considered able to afford a private sector market rent where the rent payable is up to 25% of their gross household income. Consequently, it is the relationship between local house prices and incomes which is the key determinant to whether or not a household is in housing need.

The SHMA uses market entry level prices for different dwelling types and number of bedrooms related to household requirements as the basis for the calculation. For example single person households were matched with one bedroom flats, couples without children with two bedroom flats etc.

The market entry prices for dwellings in Dover District in 2007 are shown in the table below.

Dwelling Type	Entry Price £	
Mari	ket Sale	
1 bed flat	£91,000	
2 bed flat	£115,000	
2 bed house	£124,000	
3 bed house	£125,000	
Market Rent (p.m.)		
1 bed flat	£256	
2 bed flat	£348	
2 bed house	£475	
3 bed house	£480	

# **Backlog Need**

This comprises existing households who lack their own housing or live in unsuitable housing (current need) and can't afford to meet their need in the market (including homeless, concealed and overcrowded households and those living in deficient accommodation) less those households in social housing who will have their needs met though transfers within the social stock.

The backlog calculation for Dover District is shown in the tables below:

#### **Current Need**

		No. Households
	Homeless households	105
Α	Overcrowded households	407
Α	Concealed households	201
Α	Unfit dwellings (private)	5260
Α	Other groups	27
	Total	6000

#### **Backlog Need**

		No. Households
Α	Total current housing need	6,000
В	Of which current occupiers of social housing	32
С	Backlog need (A-B)	5,968

# **Newly Arising Need**

This was calculated by modelling demographic data to produce projections for gross new household formation each year. This exercise calculated that the gross new household formation in Dover District during the period 2006-2010 would be 795.

The study then matched these newly forming household projections with income data obtained from the Survey of English Housing to arrive at an approximation of the income profile of newly forming households.

By matching the income levels of newly forming households with market entry prices for the appropriate dwelling type and using the affordability criteria referred to above, the study calculated the number of households who can't afford to access market housing.

The table below shows the projection of newly forming households during the period 2006-2010 by household type and the number requiring affordable housing.

НН Туре		No. Households
	Newly forming HH	201
Single % who can't buy		88%
Person	% who can't rent	53%
	Can't buy but can rent	70
	Can't buy or rent	107
	Newly forming HH	141
Couples	% who can't buy	76%
No	% who can't rent	14%
children	Can't buy but can rent	87
	Can't buy or rent	20
	Newly forming HH	316
Couples	% who can't buy	95%
No	% who can't rent	67%
children	Can't buy but can rent	88
	Can't buy or rent	212
	Newly forming HH	137
Single	% who can't buy	100%
Parent	% who can't rent	100%
	Can't buy but can rent	0
	Can't buy or rent	137
	Newly forming HH	795
All house-	% who can't buy	91%
holds	% who can't rent	60%
	Can't buy but can rent	246
	Can't buy or rent	475

The calculation also needs to include existing households who fall into need. The approach used in the study was to identify those households that had moved from the private sector into the social sector. The report acknowledges that this may not capture the real level of need as some households leaving the private may not have been able to secure a social rented home.

The overall calculation of newly arising household need per annum in Dover District is shown in the table below:

		No. Households
D	Gross new HH formation per	795
	annum 2006-2010	
E	% of newly forming HH unable to	60%
	afford market housing	
F	Newly forming HH unable to afford	475
	market housing	
G	Existing households falling into	103
	need	
Н	Total newly arising need	578
	(F+G)	

# **Annual Supply of Affordable Housing**

The average supply of social sector re lets in Dover District was calculated to be 283 per annum. This is based on Housing Strategy Statistical Appendix and CoRE data returns.

# **Total Annual Housing Need**

Using all the above information it is possible to calculate the net annual housing need for the District. The calculation is shown below:

		No. Households
С	Backlog Need	5,968
J	Annual quota of backlog reduction over 5 years (C÷5)	1,194
Н	Total newly arising need	578
I	Annual supply of social sector relets	283
K	Net annual housing need (J+H+I)	1,489

The annual housing need identified by the study is considerably higher than that calculated by previous housing need studies (322 households per annum). The study's authors believe that this can be mainly attributed to the low provision of affordable

housing, a lack of social sector re-lets and a consequent increase in backlog need. Over the ten years from 1998 to 2008 a total of 670 new affordable homes were provided in the District and between 2005/06 and 2007/08 affordable housing only accounted for approximately 9.3% of the 1,103 net additional dwellings with the result that the backlog need for affordable homes has continued to grow.

#### **Potential Future Supply of Affordable Housing**

The South East Plan sets targets for housing development over 20 years. It recommends that for the East Kent sub-region, 30% of newly developed homes should be affordable and gives an option for reducing the backlog of housing need over ten years rather than five.

The SHMA calculates the number of new affordable homes that could be delivered through new developments and the shortfall against the net annual housing need figure shown above. The calculation is shown below:

2006-2026 SE Plan	No. affordable	No. affordable	No. affordable	Annual difference	No. affordable	Annual difference
Total New	based on	per	needed as	(5 year)	needed as	(10 year)
Homes	30%	annum	per		per	
			Housing		Housing	
			Need		Need	
			Calculation		Calculation	
			(5 year)		(10 year)	
10,100	3,030	152	1,489	1,337	781	629

What is clear is that a 30% provision of affordable housing on new developments will still leave a significant backlog of unmet need whether the 5 year or the 10 year option is adopted.

Due to the considerable backlog of need the report recommends adoption of the five year approach which is recommended in the CLG Guidance but it also accepts that the scale of the backlog is such that it would be unrealistic to expect that it could be met even over a ten year period.

The study recognises that any increase in the affordable housing percentage to try and address the backlog would have to be carefully considered with regard to development economics and ensuring the creation of balanced communities.

#### APPENDIX C - TYPE, SIZE & TENURE OF AFFODABLE HOMES NEEDED

#### Size

As well as identifying the total amount of affordable housing required to meet backlog and newly arising need, the SHMA looked at the type of homes required for different household sizes. This took account of the supply of social sector lettings for different sizes of home and found that just over 50% of total need is for larger family homes (3 and 4 bedroom houses). This is partly due to the fact the re-let rate for larger family houses is much lower than for smaller flats. The consequence is that larger families are generally waiting longer for their needs to be met.

Because the provision of new affordable homes can't realistically address the level of need identified by the Assessment there is a need to recognise that proportionately there will be fewer larger family homes becoming available for let and that this should be addressed when determining the mix of affordable house types to be provided on future developments.

This is supported by an analysis of CORE lettings statistics for the three years 2006/07 – 2008/09 which shows that the number of larger, 3 and 4 bedroom family homes re let each year, typically averages at just over 20% of the total.

The Council's Affordable Housing Supplementary Planning Document (2007) states that the Council will seek to negotiate with developers a range of unit types to be provided on S.106 sites including, where the site is suitable, larger family units. This is underpinned by the Council's Local Development Framework Core Strategy which sets out the following proportions of affordable homes to be sought on new developments:

Home Type	Social Rented	Intermediate
One and two bed flats	25%	5%
Two bed houses	10%	35%
Three bed houses	55%	60%
Four bed houses	10%	-

The increased emphasis to be given to the provision of larger family homes also accords with priorities identified in the Regional Housing Strategy as well as the Homes & Community Agency investment priorities. Consequently affordable housing schemes which reflect the recommended unit size percentages should be given more favourable consideration with regard to bids for National Affordable Housing Programme grant funding.

#### **Tenure**

As described in Appendix A, affordable housing can take the form of rented homes and intermediate homes.

Intermediate homes generally require less financial subsidy to deliver, provide choice and help people achieve home ownership aspirations. They also help to achieve a better balance of households within new communities.

Communities and Local Government Department guidance states that "A household can be considered able to afford intermediate housing when rental payments (on the landlords share) and mortgage payments (on the part they own) do not exceed 25% of gross household income" Consequently, homes that do not meet the definition, even if offered at less than market price, should be considered 'low cost market housing' and outside the definition of affordable housing.

The SHMA found that Dover has the most affordable intermediate market in the subregion and that a large proportion of couples with no children could afford a 1 or 2 bedroom shared ownership flat. However, the study shows that a significant proportion of single people and families can't afford shared ownership.

The SHMA report recommends that the target tenure split for affordable housing should be 70% social rented and 30% intermediate housing and recommends the following proportion of dwelling types for intermediate housing.

1 bedroom	5%
2 bedroom	35%
3 bedroom	60%

The tenure split accords with that recommended in the South East Plan.

APPENDIX D - BREAKDOWN OF APPLICANTS WHO HAVE INDICATED AN INTEREST IN INTERMEDIATE HOUSING IN KENT AS AT OCTOBER 2009

No. of apps eligible					Minimum number of bedrooms required										
Interested in Local Authority	No. active apps	Buy and rent	Rental only	No. key workers	No. social tenants	1bed	2 bed	3 bed	4 bed	5 bed	Av single income	Av joint income	No. apps with a deposit	Av deposit	Number of apps requiring a wheelchair adapted property
Ashford	382	302	80	92	30	230	99	48	4	1	£22,211	£31,838	322	£8,637	1
Canterbury	373	275	98	140	18	250	84	37	2	0	£22,864	£32,333	291	£8,447	1
Dartford	636	497	139	40	20	393	172	65	5	1	£25,289	£35,848	520	£9,387	2
Dover	148	96	52	44	12	99	35	12	2	0	£20,570	£30,209	108	£9,303	1
Gravesham	326	238	88	85	26	198	95	29	3	5	£24,296	£34,529	259	£9,745	0
Maidstone	757	597	160	23	72	486	188	75	7	1	£23,444	£33,938	646	£9,288	3
Medway	853	638	215	209	74	479	227	140	7	0	£23,114	£33,544	425	£13,165	1
Sevenoaks	368	306	62	72	8	207	94	64	3	0	£23,290	£36,498	322	£12,883	1
Shepway	129	102	27	39	5	74	35	18	1	1	£21,995	£30,547	107	£7,977	0
Swale	330	254	76	84	31	195	80	54	1	0	£22,086	£31,553	263	£10,139	0
Thanet Tonbridge and Malling	190 505	168 407	22 98	61 89	11 54	120 310	43 136	25 52	2 6	0	£22,513 £23,134	£29,884 £35,156	172 438	£7,684 £12,868	1
Tunbridge Wells	292	251	41	53	33	181	67	43	1	0	£23,813	£35,996	265	£12,523	2

Source: Moat LA Demand Statistics October 2009

# **APPENDIX E - INDICATIVE DELIVERY TRAJECTORIES**

# **APPENDIX E**

