

Thanet District Council **Matter Statement**

Matter 3 - Affordable Housing Need



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Issue 1 – Definition of Affordable Housing

Q1. Does the Plan include a definition of affordable housing? If not, to be effective should one be included?

This is provided in the Glossary, and is broadly the same as the definition provided in the NPPF. How eligibility is determined is not included in the local plan definition as the Council has a 'closed' list of those eligible.

There is an error in the first line of the policy - it should read '**Residential development schemes for 10 or more dwelling units**'

Issue 2 – Affordable Housing Need

Q1. What is the annual net need for affordable housing as defined by the SHMA? For clarity to decision-makers, developers and local communities should the need for affordable housing be clearly set out in the Plan?

The SHMA undertook an assessment of the need for affordable housing, using the Basic Needs Assessment Model. It identified a net annual need for 397 affordable homes per annum. This is the level of provision which would be necessary if all households requiring financial support were to be allocated an affordable home. This could be included in supporting text (paragraph 3.34) if the Inspectors' consider this would provide better clarity.

Q2. Has the affordable housing need been correctly established, and is it based on up-to-date information?

The SHMA and within the Affordable Housing Needs assessment was produced based on the most up to date information at the time and following the Planning Practice Guidance.

Q3. How does it compare to the housing requirement?

The affordable housing need is 397 and the housing requirement is 857 dpa. This equates to around 46% of the total housing need. However, this is not a like for like comparison as not all of those in housing need would require a net additional home. This is because some groups such as households in unsuitable accommodation (e.g. too small) would release their home for another family in need should they be provided with suitable accommodation. Thus, two households would be housed in affordable accommodation but only one additional affordable home is built.

Q4. What is the justification for requiring at least 30%affordable housing on qualifying sites? What is this based on, how was it calculated and what alternatives were considered?

The Local Plan Viability Assessment offered three options for setting an affordable housing requirement:

- 1) Differential targets between the range of 20-30%
- 2) Single target at 25%
- 3) Single target at 30%

It goes on to say that the Viability Assessment does not dictate the policy direction for affordable housing requirement, rather informs it along with other information and delivery experience available

to the Council.

There is still a significant affordable housing requirement which would justify as much affordable housing as possible to be delivered. The 30% affordable housing requirement reflects that which could be viably delivered (but the policy allows for the negotiation of a lower level of provision if necessary).

Q5. Based on the requirements for qualifying developments to provide 30% affordable housing, how many affordable homes is the Plan expected to deliver?

The Plan allocates a total of 8949 new dwellings. Of those, 8888 qualify (ie are 10 or more units) to provide 30% affordable housing. Therefore the Plan expects to deliver 2666 affordable homes over the plan period through its allocated sites (133 dwellings per annum).

Q6. How does this compare to the identified need?

The identified level of need is set out in the Strategic Housing Market Assessment update (CD4.1), - para 1.5 identifies a net need for affordable housing of 397 dwellings per hectare.

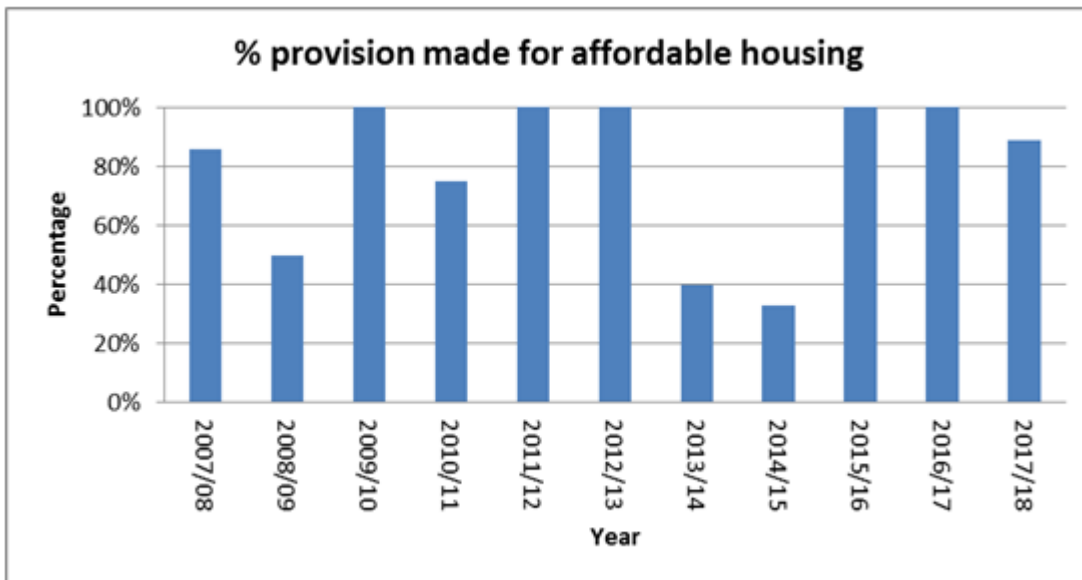
Q7. How does this compare to previous performance? How many affordable homes have been provided as a percentage of total output over the past 5- 10 years?

Please see table below:

Year	Completions	Number of affordable homes provided	% of affordable homes provided of total output
2011-12	307	30	9.7
2012-13	217	109	50.2
2013-14	322	73	22.7
2014-15	380	86	22.6
2015-16	350	56	16
2016-17	478	107	22.4
2017-18	305	32	10.5

The Council, as Housing Authority, has a contextual indicator rather than a set target for affordable housing. This reflects the difficulty in bring forward large numbers of affordable housing units. This is affected by viability issues on individual sites, and by changes to the affordable housing grant regime.

The Council has secured a reasonable amount of affordable housing contributions through planning applications as shown on the table below (extract from the 2018 AMR) showing percentages of provision made for affordable housing on eligible sites. However the level of delivery of affordable housing is reduced because of developers citing viability issues.



Q8. The PPG states that an increase to the total housing figures should be considered where it would help deliver the required number of affordable homes. Has an uplift to the housing requirement for this reason been considered? If so, where is this set out?

An uplift to the total housing figures was considered, however given the housing delivery issues addressed elsewhere in other Matter Statements, it is not considered that this is a realistic means of delivering higher levels of affordable housing

Issue 3 – Viability

Q1. The *Thanet District Council Local Plan and CIL Viability Assessment* indicates that for schemes on previously developed land, where development costs are typically higher than greenfield sites, the affordable housing target could be lowered to 20% (paragraph 3.12.3). With this in mind, what is the justification for a 30% target across all development types and locations? Is Policy SP20 justified?

It may be appropriate for some sites on previously developed land to provide a lower percentage of affordable housing due to higher land values/higher costs. Viability assessments can be submitted alongside planning applications to demonstrate viability, and affordable housing provision negotiated on a case by case basis. The final clause of the policy allows for flexibility in this respect, and alternative provision has been negotiated as demonstrated in Q2 below.

Q2. How has the evidence-base considered the differences between bringing forward strategic and non-strategic sites? Does it justify a consistent approach to affordable housing across all sites, regardless of size?

The plan explains (para 3.37) that a financial contribution should not be sought for proposals fewer than 10 dwellings. There is an error in the text - the last sentence of paragraph 3.37 should read as follows:

'It is accepted that on sites comprising a total of ~~10 dwellings or less~~ less than 10

dwellings.....'

The 2018 Annual Monitoring Report (extract below) demonstrates that the council applies a consistent approach towards the affordable housing requirement, and will make adjustments or accept financial contribution towards off-site provision if viability is proven to be an issue.

Permitted application number	Postal address	PROPOSAL	Total units	Affordable Housing contribution
15/0250	Land North of Haine Road Broadstairs and West of Nash Road Margate Phase 5 Margate	Application for approval of access, appearance, landscaping, layout and scale pursuant to condition 1 of F/TH/12/0964, for the development of Phase 5 (part) of a mixed use urban extension comprising residential use, open space, associated infrastructure and new access.	469	118 affordable housing units
15/0187	Flambeau Europlast Ltd, Manston Road, Ramsgate, CT12 6HW	Outline application for the redevelopment of the existing site for up to 120 dwellings including access, following demolition of existing buildings	120	Viability was raised as an issue and at affordable housing financial contribution was made towards off-site affordable housing provision in Ramsgate.
17/0726	Land North of Haine Road Broadstairs and West of Nash Road Margate Phase 3C Margate	Mixed use urban extension comprising: residential use (Class C3), community facilities (Class D1), commercial and employment uses (Class A1-A5, B1 and D2) and associated infrastructure including a new link road associated alterations to existing junctions and new access arrangements	97	26 affordable housing units

17/1485	Land At New Haine Road Ramsgate	Reserved matters application for the approval of access, layout, scale, landscaping and appearance for the erection of 54 dwellings (Phase 1) pursuant to outline planning permission OL/TH/11/0910 for mixed-use development	54	5 affordable housing units
16/1715	Land South Of Manston Road Adjacent To The Beacon (Former Car Storage Site) Manston Road Ramsgate	Outline application for 48 dwellings including access with all other matters reserved	48	14 affordable housing units
16/0654	66 Monkton Road Minster Ramsgate	Outline application with some matters reserved including access, for the erection of 36 dwellings with construction of new access from Monkton Road, associated new internal access roads, drainage and landscaping (reserved)	35	11 affordable housing units

17/1159	Westcliff House 37A Sea Road Westgate On Sea CT8 8QW	Erection of 4 storey front/side and rear extension with balconies, 3rd floor front/side and rear extensions with terraces, 3 storey rear extension with balconies along with alterations to fenestration following removal of fire escape to facilitate conversion into 27No 2 bed apartments and 4No 1 Bed apartments with associated parking and new pedestrian access	31	Viability was raised as an issue and at affordable housing financial contribution was made towards off-site affordable housing provision
16/1473	Land South Of Briary Close, Margate	Application for outline planning permission for the erection of up to 24no. dwellings including details of access	24	7 affordable housing units
17/0842	64 Edgar Road Margate	Change of use and extension of former residential home (use class C2) along with the erection of a 5 storey building to create 16No 2 Bedroomed and 2No 3 Bedroom apartments and associated works	15	Should have provided 5 units but viability was identified as an issue – no provision made.