

# Affordable Housing Statement

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Land at Marden, Maidstone Borough

# Affordable Housing Statement

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Outline planning application for the erection of up to 117 dwellings and associated infrastructure (with access only for consideration, with all other details for Reserved Matters).

Land east of Albion Road and north of Copper Lane, Marden

Maidstone Borough

Rydon Homes

August 2023

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# Introduction

## Section 1

- 1.1 This **Affordable Housing Statement** is prepared by **Tetlow King Planning** on behalf of the Applicant, **Rydon Homes**, in respect of the proposed development of up to 117 dwellings at land east of Albion Road and north of Copper Lane, Marden, in Maidstone Borough.
- 1.2 Outline planning permission is sought for the “*erection of up to 117 dwellings and associated infrastructure (with access only for consideration, with all other details for Reserved Matters)*”.
- 1.3 The Applicant proposes **40% affordable housing** (up to **47 affordable dwellings**) to be secured through a Section 106 planning obligation. The mix of affordable tenures will be subject to discussions with the Council having regard to both adopted and emerging Local Plan policy, and national planning policy.
- 1.4 The outline application includes an indicative affordable housing mix (including terraced, semi-detached and detached dwellings, and bungalows) as follows:

*Figure 1.1: Indicative Affordable Housing Mix*

|                     | 1-bedroom | 2-bedroom | 3-bedroom | 4- and 5-bedroom |
|---------------------|-----------|-----------|-----------|------------------|
| Number of dwellings | 16        | 15        | 12        | 4                |
| % of dwellings      | 34%       | 32%       | 26%       | 8%               |

Source: Rydon Homes

- 1.5 This indicative mix of dwelling sizes has been informed by discussions with officers from the Council’s Homechoice Team during the scheme’s development in 2022, with relevant correspondence reproduced at **Appendix 1**. The indicative mix broadly corresponds with the strategic mix expectations contained in the Council’s Affordable and Local Needs Housing Supplementary Planning Document 2020.

- 1.6 This Affordable Housing Statement deals specifically with the topic of affordable housing and the weight to be attributed to it in the planning decision, in light of the evidence of need in Maidstone Borough. It considers the positive contribution that the proposed development can make towards meeting this need and tackling the affordability challenges that affect many of the Borough's residents.
- 1.7 The Statement takes account of a range of affordable housing indicators as well as consideration of national planning policy, performance against identified needs for affordable housing, affordability issues, and the Council's own corporate objectives. This Statement concludes there is a pressing need for the proposed affordable homes and that planning permission should be granted without delay.
- 1.8 It is important to note that the application site has been proposed as an allocation (reference LPRSA295) in the Council's emerging Local Plan, which has reached the Main Modifications stage at the time of writing. This indicates that the Council has already accepted the principle of development at this site. This application is made by an experienced housebuilder with the resources, expertise and commitment to bring forward housing as soon as possible at this site. As such, this site offers the opportunity to promptly deliver much-needed affordable homes and ensure that households in need spend less time waiting for an affordable home.
- 1.9 In preparing this Statement, Tetlow King Planning has liaised with the Council's Homechoice Team to obtain a range of data in respect of the Housing Register in Maidstone Borough. This correspondence is included at **Appendix 2** of this Statement.
- 1.10 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government. This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), the National Housing Strategy and the Government's Housing White Paper. Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.

1.11 This Statement comprises the following five sections:

- Section 2 analyses the Development Plan and related policy framework including corporate documents;
- Section 3 sets out the identified affordable housing needs in Maidstone Borough;
- Section 4 examines past affordable housing delivery in Maidstone Borough against identified needs;
- Section 5 covers a range of affordability indicators; and
- Section 6 considers the key issues and recommends that the proposed development should be approved.

# The Development Plan and Related Policies

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## Section 2

### Introduction

- 2.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 2.2 At present, the relevant Development Plan in respect of affordable housing for the application site comprises the Maidstone Borough Local Plan 2011 to 2031 (adopted October 2017) and the Marden Neighbourhood Plan 2017 to 2031 (made July 2020).
- 2.3 The Council has prepared a new Local Plan for the period 2022 to 2027 which has been subject to Examination by an independent Planning Inspector and as of August 2023 has reached the Main Modifications stage. The emerging Local Plan is an important material consideration.
- 2.4 Other material considerations include the National Planning Policy Framework (2021), the Planning Practice Guidance (March 2014, ongoing updates), the Affordable and Local Needs Housing Supplementary Planning Document (adopted July 2020), and a range of corporate documents produced by the Council.

### The Development Plan

#### **Maidstone Borough Local Plan 2011 to 2031 (adopted October 2017)**

- 2.5 The Maidstone Borough Local Plan covers the twenty-year period from 2011 to 2031, paragraph 1.3 states that to ensure an up-to-date planning policy framework is maintained, a review of the plan will be completed by April 2021.
- 2.6 Meeting housing needs by delivering affordable housing is identified as a key local issue at paragraph 3.6 of the Local Plan.
- 2.7 Paragraph 3.11 of the Local Plan introduces a spatial vision to be achieved by 2031, which includes the following expectation:

*“There will be a better balanced housing market to meet the needs of the community across the whole borough”.*



- 2.8 Further, paragraph 3.12 of the Local Plan lists a number of spatial objectives to ensure that the Local Plan’s vision is achieved, in relation to affordable housing, objective 10 states:

*“To provide for future housing that meets the changing needs of the borough’s population including provision for an increasingly ageing population and family housing, an appropriate tenure mix, affordable housing and accommodation to meet the needs of the Gypsy and Traveller community” (emphasis added)*

- 2.9 The Local Plan does not indicate a target for the delivery of affordable homes within the Borough, it is therefore assumed this target is incorporated within Policy S1<sup>1</sup>, which sets out that between 2011 and 2031, the provision of 17,660 new dwellings will be made the granting of planning permissions and the allocation of sites.

- 2.10 Policy SP5 ‘Rural Service Centres’ of the Local Plan identifies Marden as a rural service centre. Paragraph 4.82 of the supporting text recognises the importance of affordable housing and states:

*“Marden has frequent rail connections to London and other retail and employment centres, which has created a demand for new development. This has to be balanced with the desire to ensure local people have access to affordable housing”.*

- 2.11 Policy SP9 ‘Marden Rural Service Centre’ goes on to set out the overarching policy expectations for development in Marden.

- 2.12 Policy SP19 ‘Housing Mix’ sets out expectations to help achieve the delivery of sustainable mixed communities across new housing developments and within existing housing areas throughout the Borough. With regard to affordable housing, the Policy states:

*“Where affordable housing is to be provided, developers should also take into consideration the needs of households on the council’s housing register and discuss affordable housing requirements with the council’s housing team at the pre-submission stage of the planning process”.*

- 2.13 Paragraph 4.125 of the supporting text states:

*“Developers will need to access a range of sources, including the [Strategic Housing Market Assessment], to help shape their proposals. Local*

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<sup>1</sup> Maidstone Borough spatial strategy.

*stakeholders, including parish councils, may often be able to provide targeted information that assists an applicant to submit a locally relevant scheme. Neighbourhood plans can also be used as a mechanism to allow some flexibility and local context while contributing to the overarching strategic needs of the borough. Where affordable housing is proposed or required, the housing register will provide additional guidance”.*

- 2.14 The Local Plan therefore expects affordable housing proposals to be shaped by the Council’s housing register; advice from the Council’s housing team; neighbourhood plans; local stakeholders, including parish councils; and the 2014 Strategic Housing Market Assessment.
- 2.15 Policy SP13 also advises that an Affordable and Local Needs Housing Supplementary Planning Document (“SPD”) will be produced to expand on how the proposals in this policy will be implemented. The Affordable and Local Needs Housing SPD was subsequently adopted in July 2020 and is discussed later within this section.
- 2.16 Policy SP20 ‘Affordable Housing’ sets out the Council’s approach to securing affordable housing in the Borough. Paragraph 4.126 of the Local Plan’s supporting text introduces the topic of affordable housing need (which is discussed further at Section 3 of this Statement), and states:

*“The council has a net affordable housing need of 5,800 homes from 2013 to 2031 [Maidstone Strategic Housing Market Assessment (June 2015)], equivalent to 322 households each year. This is a significant need for the borough and a clear justification for the council to seek affordable dwellings through new development schemes”.*

- 2.17 Policy SP20 states:

| Policy SP20 ‘Affordable Housing’  |
|---|
| <p><i>On housing sites or mixed use development sites of 11 residential units (gross) or more, or which have a combined floorspace of greater than 1,000m<sup>2</sup> (gross internal area), the council will require the delivery of affordable housing.</i></p> <p><b>1. The target rates for affordable housing provision within the following geographical areas, as defined on the policies map, are:</b></p> <ul style="list-style-type: none"> <li><i>i. Maidstone urban area 30%, with the exception of policy H1(11) Springfield, Royal Engineers Road 20%; and</i></li> <li><b>ii. Countryside, rural service centres and larger villages 40%.</b></li> </ul> |

2. **Affordable housing provision should be appropriately integrated within the site.**

*In exceptional circumstances, and where proven to be necessary, off-site provision will be sought in the following order of preference:*

- i. An identified off-site scheme;*
- ii. The purchase of dwellings off-site; or*
- iii. A financial contribution towards off-site affordable housing.*

3. *The indicative targets for tenure are:*

- i. 70% affordable rented housing, social rented housing or a mixture of the two; and**
- ii. 30% intermediate affordable housing (shared ownership and/or intermediate rent).**

*Developers are required to enter into negotiations with the council's Housing department, in consultation with registered providers, at the earliest stage of the application process to determine an appropriate tenure split, taking account of the evidence available at that time.*

- 4. *The council will seek provision of 20% affordable housing for schemes that provide for retirement housing and/or extra care homes.*
- 5. *The council has set a zero affordable housing rate for fully serviced residential care homes and nursing homes.*
- 6. *Where it can be demonstrated that the affordable housing targets cannot be achieved due to economic viability, the tenure and mix of affordable housing should be examined prior to any variation in the proportion of affordable housing.*

*The Affordable and Local Needs Housing Supplementary Planning Document will contain further detail on how the policy will be implemented" (emphasis added).*

2.18 The application site is located outside of the Maidstone urban area within a rural service centre, meaning **the affordable housing provision target for the development is 40%.**

2.19 The Local Plan sets out two monitoring indicators for Policy SP20, which are set out in full within Figure 2.1 below.

*Figure 2.1 Policy SP20 Monitoring*

| Indicator  | Target   | Trigger   | Action  |
|--|--|---|---|
| M11<br>Number and tenure of affordable homes delivered (including starter homes)                       | Number and tenure of affordable homes completed/ consented per annum matches policy requirement. | Affordable housing delivery over phasing period (3-5 years) falls significantly below annual requirement.<br><br>Tenure of affordable housing delivered over phasing period (3-5 years) deviates significantly from indicative policy target. | Work with Registered SP20 Providers to secure greater delivery or change to tenure of delivery.<br><br>Promote council owned sites for affordable housing.<br><br>Review interpretation of approach regarding off-site contributions. |
| M12<br>Affordable housing as a proportion of overall housing delivery in qualifying geographical areas | SP20 percentage requirements achieved on all qualifying developments in geographical areas.      | Proportion of affordable housing delivered in the respective geographical areas over phasing period (3-5 years) deviates significantly from indicative policy targets.  | Review approach towards SP20 affordable housing provision, including with Registered Providers.   |

Source: Local Plan

## 2.20 Paragraph 4.241 states:

*“In Maidstone Borough, some forms of infrastructure provision have historically not kept pace with development. This has been a contributory factor to some issues such as a congested road network, a shortage of affordable housing, deficiencies in open space provision and poor access to key community facilities in certain areas. There is concern that future growth will intensify this problem unless a co-ordinated effort is made to ensure that essential infrastructure accompanies new development at all times”.*

## 2.21 Policy ID1 ‘Infrastructure delivery’ sets out that where there are competing demands for contributions towards the delivery of infrastructure, secured through section 106 legal agreements, the Council will prioritise these demands in the manner listed below, with affordable housing at the top of the list:

- i. Affordable housing
- ii. Transport
- iii. Open space
- iv. Public realm
- v. Health

- vi. Education
- vii. Social services
- viii. Utilities
- ix. Libraries
- x. Emergency Services
- xi. Flood defences

- 2.22 Policy ID1 sets out that the list above serves as a guide to the Council's prioritisation process, whilst recognising that each site and development proposal will bring with it its own issues that could mean an alternate prioritisation is used. The Policy also sets out the viability process, albeit this not a salient matter for the development.
- 2.23 Policy LPR1 'Review of the local plan' instils a target to review the Local Plan by April 2021. The Policy states that one of the matters the first review may need to address is housing needs, as well as the identification of additional housing land to maintain supply towards the end of the plan period. The Local Plan Review has commenced and has reached an advanced stage; this is discussed in more detail below.

**Marden Neighbourhood Plan 2017 – 2031 (made July 2020).**

- 2.24 The Marden Neighbourhood Plan 2017 – 2031 ("the NDP") was developed in parallel with the Local Plan. At page 37 the NDP acknowledges the need for affordable housing within Marden, stating:
- "Marden's need for affordable housing has been proven through a series of Housing Needs Surveys and has been consistently supported by residents (and others with Marden connections) at Neighbourhood Plan Open Days".*
- 2.25 The NDP states that it is unlikely that all need for affordable housing can be met through the recent housing development sites, and therefore includes a policy for affordable housing on rural exception sites: Policy In5 'Affordable Housing on Rural Exception Sites'.
- 2.26 This Policy is not relevant to the proposal, save for acknowledging affordable housing need in Marden. The NDP refers to the Local Plan for the more general affordable housing policy.

## Other Material Considerations

### Emerging Local Plan Review (2022 to 2027)

- 2.27 As required by the adopted Local Plan Policy LPR1, the Council has commenced its review of the Local Plan.
- 2.28 The Local Plan Review was submitted to the Secretary of State for independent examination on 31 March 2022. On 5 July 2023, the examining Inspector wrote to the Council advising that following Stage 2 hearings, they found that Local Plan Review could be made sound by main modifications, which would need to be consulted upon. It is understood that this Main Modifications consultation will take place in Autumn 2023.
- 2.29 The Council published a Local Development Scheme 2023 – 2025 in February 2023 (“the LDS”), which sets out the timetable for the delivery of the Local Plan Review. The LDS sets out that in 2023 examination (Regulation 24) and main modification consultation will occur, with adoption of the new Local Plan timetabled for January 2024.
- 2.30 The submitted Regulation 19 Draft Plan for Submission Document (October 2021) covers the fifteen-year period 2022 to 2037.
- 2.31 Draft Policy LPRSS1 ‘Maidstone Borough Spatial Strategy’ expects the provision of 17,746 new dwellings over the Local Plan Review period, though the granting of planning permissions and the allocation of sites. Like the existing Local Plan, the emerging Policy does not set a target for the delivery of affordable homes.
- 2.32 As with the existing Local Plan, emerging Policy LPRS6 ‘Rural Service Centres’ identifies Marden as a rural service centre.
- 2.33 Draft Policy LPRS6(E) ‘Marden’ concerns Marden, setting a housing target amongst other expectations. the emerging policy identifies the application site to be appropriate for the delivery of approximately 113 new homes (LPRSA295).
- 2.34 Draft Policy LPRSP10(A) ‘Housing Mix’ is very similar to adopted Local Plan Policy SP19, with regard to affordable housing, the Policy states:

*“Accommodation profiles detailed in the Strategic Housing Market Assessment 2021 (or any future updates) will be used to help inform developers to determine which house sizes should be delivered in urban and rural areas to meet the objectively assessed needs of the area. In relation to affordable*

*housing, the council will expect the submission of details of how this information has been used to justify the proposed mix.*

*Where affordable housing is to be provided, developers should also take into consideration the needs of households on the council's housing register and discuss affordable housing requirements with the council's housing team at the pre-submission stage of the planning process".*

- 2.35 Paragraph 7.14 of the submitted Local Plan Review discusses the overall affordable housing need in Maidstone and its supporting evidence; it states:

*"The Maidstone Strategic Housing Market Assessment 2021 supports the approach of seeking a proportion of dwellings to be provided on-site for affordable housing needs. The council has a net affordable housing need 8385 homes from 2022 to 2037, equivalent to 559 households each year. This is a significant need for the borough and a clear justification for the council to seek affordable dwellings through new development schemes. The Strategic Housing Market Assessment also indicates that the need for rented affordable housing makes up 75% of the overall affordable housing need of the borough, with the remaining 25% of affordable need arising from demand for affordable homeownership products" (emphasis added).*

- 2.36 Draft Policy LPRSP10(B) 'Affordable Housing' states:

| Policy LPRSP10(B) 'Affordable Housing'  |
|---|
| <p><i>On major housing development sites or mixed-use development sites where 10 or more dwellings will be provided, or the site has an area of 0.5 hectares or more, the council will require the delivery of affordable housing.</i></p> <ol style="list-style-type: none"> <li><i>1. The target rates for affordable housing provision within the following geographical areas, as defined on the policies map, are:</i> <ol style="list-style-type: none"> <li><i>a) Greenfield development in mid and high value zones at 40%</i></li> <li><i>b) Brownfield development in high value zone at 40%.</i></li> <li><i>c) Development in the low value zone and brownfield development in the mid value zone will not normally be expected to deliver affordable housing, however where opportunities exist to provide affordable housing the council will seek to secure this.</i></li> </ol> </li> <li><i>2. Affordable housing provision should be appropriately integrated within the site. In exceptional circumstances, and where proven to be necessary, off-site provision will be sought in the following order of preference:</i> <ol style="list-style-type: none"> <li><i>b) An identified off-site scheme;</i></li> </ol> </li> </ol> |



- c) *The purchase of dwellings off-site; or*
  - d) *A financial contribution towards off-site affordable housing.*
3. *The indicative targets for tenure are:*
- a) *75% Social and affordable rented.*
  - b) *A minimum of 25% First Homes*
4. *On new build housing developments, the affordable housing element will be expected to meet the optional technical standard M4(2). Where 25% of First Homes will not be adequate to meet the minimum 10% Affordable Home Ownership target set by the NPPF then any shortfall can be met through the provision of First Homes or an alternative Affordable Home Ownership product.*
5. *Developers are required to enter into negotiations with the council's Housing Department, in consultation with registered providers, at the earliest stage of the application process to determine an appropriate tenure split, taking account of the evidence available at that time.*
- a) *The council will seek provision of 20% affordable housing for schemes that provide for C3 retirement housing on greenfield and brownfield sites in the rural and outer urban areas.*
  - b) *The council has set a zero affordable housing rate for fully serviced residential care homes and nursing homes.*
  - c) *Where it can be demonstrated that the affordable housing targets cannot be achieved due to economic viability, the tenure and mix of affordable housing should be examined prior to any variation in the proportion of affordable housing.*
6. *The Affordable and Local Needs Housing Supplementary Planning Document contains further detail on how the policy will be implemented.*

2.37 The underlined section of the draft Policy text reflects relevant proposed main modifications proposed to the draft Policy by the Council<sup>2</sup>, to reflect the provisions of paragraph 65 of the NPPF in respect of affordable home ownership. It should be noted that the Inspector has not sought any further main modifications beyond those proposed by the Council.

2.38 The draft Local Plan Review identifies the application site as being within a high value zone, meaning **the draft Policy expects a minimum of 40% of the houses proposed to be affordable.**

<sup>2</sup> LPRSUBB 011 Proposed Main Modifications to the Local Plan Review Documents.



- 2.39 Draft Policy LPRSP13 'Infrastructure Delivery' is very similar to the existing Local Plan's corresponding policy so will not be discussed further.
- 2.40 Draft Policy LPRSA295 'Land at Copper Lane and Albion Road, Marden' concerns the application site, proposing a draft allocation for the development of approximately 113 dwellings. The draft Policy does not include any site-specific requirements concerning affordable housing.
- 2.41 Draft Policy LPRHPU6 concerns affordable housing need on rural exception sites, including first homes. Again, this is not applicable to the proposed development which is not advanced as a rural exception site.
- 2.42 In summary, the Local Plan Review is a material consideration that should be considered in the determination of this planning application. The Local Plan review identifies a significant need for affordable housing in the Borough.

### **Supplementary Planning Documents**

#### **Affordable and Local Needs Housing Supplementary Planning Document (adopted July 2020)**

- 2.43 The Regulation 19 Draft Plan for Submission Document October 2021 states that the Affordable and Local Needs Housing SPD ("ALHN SPD") is proposed to be saved.
- 2.44 Paragraph 1.8 of the ALHN SPD states that the ALHN SPD "...is intended to maximise the delivery of truly affordable homes in the [B]orough".
- 2.45 Paragraph 2.9 of the ALHN SPD acknowledges the undersupply of affordable housing in the Borough:

*"Between 2011 – 2019 the Borough delivered 1,744 new affordable homes, of which 63 were delivered on rural exception sites for local needs housing. This equates to 218 units per year which is below the target of 322 units per year (identified in the [Strategic Housing Market Assessment] Jan 2014) and demonstrates the need to aim to provide more affordable housing units".*

- 2.46 In terms of the type of affordable housing, paragraph 5.5 of the ALHN SPD states:

*"Across the Borough as a whole, it is estimated that some 67% of need is for social or affordable rent tenures, whilst around 33% is for intermediate housing. Smaller (one and two bedroom) dwellings account for between 60% and 70% of the need with larger (three and above) dwellings accounting for between 30% and 40%".*

- 2.47 In relation to Policy SP19 'Housing Mix' of the Local Plan, paragraph 6.5 of the AHLN SPD advises that the most up-to-date Strategic Housing Market Assessment ("SHMA") should be used to help inform the housing mix proposals for affordable housing. The Maidstone Strategic Housing Market Assessment 2021 Update is the most recent SHMA and is discussed in detail within Chapter 3 of this Statement.
- 2.48 Paragraph 1.15 of the Maidstone SHMA 2021 Update provides strategic conclusions on the mix of housing needed and is incorporated into Figure 2.2 below.

*Figure 2.2: Strategic conclusions on the mix of housing needed in the Borough*

|       | <b>Social / Affordable Rented</b> | <b>Affordable Home Ownership</b> | <b>Market</b> |
|-------|-----------------------------------|----------------------------------|---------------|
| 1-bed | 30-40%                            | 25%                              | 5%            |
| 2-bed | 30-35%                            | 40%                              | 25%           |
| 3-bed | 25-30%                            | 25%                              | 45%           |
| 4-bed | 10%                               | 10%                              | 25%           |

*Source: Maidstone Strategic Housing Market Assessment 2021 Update*

- 2.49 The proposal is therefore expected to provide a mix of affordable units on site to comply with the mix outlined in Figure 2.2. As Figure 1.1 in Section 1 of this Statement illustrates, the proposed indicative affordable housing mix broadly corresponds with this above mix.
- 2.50 Paragraph 7.4 of the SPD indicates that *"[i]n all cases, it is expected that new affordable housing delivered under Policy SP20 will be delivered without the input of public subsidy, which includes grant from Homes England"*.
- 2.51 Paragraph 8.3 of the SPD outlines *"[t]he Council's preference is for social rent and this will be the initial assumed tenure for the rented units. However, it is accepted that the delivery of social rent has been difficult and that the most common rented tenure being delivered is affordable rent. It should also be noted that the Economic Viability Report used to support the Local Plan assumed a tenure split of 70% affordable rent / 30% intermediate and did not include any social rent"*.
- 2.52 The SPD expects affordable housing to be *"...fully integrated mixed tenure housing schemes within the market housing and will support a reasonable level of clustering, particularly for any proposed flatted units, to enable small self-contained blocks. The location of the units is to be agreed with the Housing Delivery Team at the pre-application stage"* (paragraph 9.2).

- 2.53 Further, the SPD acknowledges issues with mixed tenure blocks of flats, and advises at paragraph 9.4, *“[w]here flats are provided on site as part of the affordable housing package then these should be in separate blocks with the freehold transferred to the RP. This will enable the RPs to set service charges which are affordable to their tenants/purchasers”*.
- 2.54 Section 10 of the SPD outlines expected standards for affordable homes, such as space and accessibility standards.
- 2.55 Matters such as the integration, design and accessibility standards, and levels of dedicated car parking for affordable homes are matters of detailed design that will be considered at the Reserved Matters stage in due course.
- 2.56 Paragraphs 16.3 and 16.4 of the SPD encourage developers to make contact with the Council’s Housing Department. This has occurred, and a record of the Housing Department’s preferred affordable housing mix is included in **Appendix 1**.

### **Corporate Documents**

- 2.57 The Council’s corporate documents identify the delivery of affordable housing as a high corporate priority of Maidstone Borough Council. These include the following documents:
- a. Maidstone Housing Strategy 2016 to 2020;
  - b. Draft Maidstone Housing Strategy 2021 to 2026;
  - c. Homelessness and Rough Sleepers Strategy 2019 to 2024; and
  - d. Maidstone Borough Council Strategic Plan 2019 to 2045.

### **Conclusions on the Development Plan and Related Policies**

- 2.58 The Development Plan for the Council currently comprises the Maidstone Borough Local Plan 2011 – 2031 (adopted October 2017).
- 2.59 The evidence set out in this section clearly highlights that within adopted policy, emerging policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within the Borough.

- 2.60 The application commits to meeting the principal Local Plan expectation for 40% of the total units to be affordable housing, as set out in Policy SP20 of the Local Plan. The proposed affordable housing provision would also meet the principal expectation of draft Policy LPRSP10(B) of the emerging Local Plan, which is also 40%.
- 2.61 The delivery of up to 47 affordable homes at the application site will make a significant contribution towards the annual affordable housing needs of the Borough, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail in Section 3 of this statement.

# Affordable Housing Needs in Maidstone Borough

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## Section 3

- 3.1 As set out in the supporting text of both the adopted and emerging Local Plans, it is important to consider the objectively assessed need for affordable housing within the most up-to-date assessment of local housing need. This is contained in the Maidstone Strategic Housing Market Assessment 2014 (which is part of the evidence base for the adopted Local Plan) and the Maidstone Strategic Housing Market Assessment 2021 Update (which is part of the evidence base for the emerging Local Plan). These two assessments seek to identify the unconstrained (or “policy-off”) level of affordable housing need in Maidstone.

### **Maidstone Strategic Housing Market Assessment 2014**

- 3.2 The Maidstone Strategic Housing Market Assessment 2014 (the “SHMA 2014”) was prepared by consultants GL Hearn and forms part of the evidence base for the adopted Local Plan. It identifies the affordable housing need for the eighteen-year period from 2013 to 2031, with the assessment being set out at Chapter 7.
- 3.3 The affordable housing need is calculated following the methodology contained in Planning Practice Guidance. In summary, this methodology identifies a net affordable housing need per annum, by:
- a. Identifying the existing affordable housing need as of the base date of the assessment, and addressing this in full over the assessment period;
  - b. Identifying the annually-arising affordable housing need, from newly-forming households unable to afford on the open market, and from existing households falling into need;
  - c. Deducting the supply of affordable housing from re-lets and re-sales from the existing stock, which can be used to accommodate households in need
- 3.4 This assessment arrives at a net need figure. Table 49 at page 128 of the SHMA 2014 sets out the net affordable housing need in Maidstone for the period, which equates to

322 affordable dwellings per annum between 2013 and 2031, or 5,800 affordable dwellings over the period.

### **Maidstone Strategic Housing Market Assessment 2021 Update**

- 3.5 The Maidstone Strategic Housing Market Assessment 2021 Update (the “SHMA 2021 Update”) was prepared by consultants Icen Projects and Justin Gardner Consulting, and forms part of the evidence base for the emerging Local Plan Review. An earlier version was prepared in 2019; paragraphs 2.8 to 2.8 at pages 7 and 8 explain that the SHMA 2021 Update reflects changes in national planning policy since then.
- 3.6 Section 5 sets out the assessment of affordable housing need for the eighteen year period from 2019 to 2037. The assessment follows a similar structure and methodology to that in the previous SHMA 2014, but identifies separate need figures for affordable rented housing and affordable home ownership options (in accordance with the current National Planning Policy Framework). Table 5.14 at page 61 of the SHMA 2021 Update sets out the net affordable rented housing need in Maidstone, which equates to 422 affordable rented dwellings per annum between 2019 and 2037.
- 3.7 Table 5.15 at page 61 presents a side-by-side comparison between the two SHMAs and shows that the current or existing need has more than doubled; the newly arising need from new and existing households has fallen slightly and the supply of re-lets has fallen by almost one quarter.
- 3.8 In addition, the need for affordable home ownership now forms a separate element of the calculation of affordable housing need. Table 5.19 at page 65 of the SHMA 2021 Update shows sets out the net affordable home ownership need in Maidstone for the period, which equates to 137 affordable home ownership dwellings per annum.
- 3.9 Paragraph 5.20 at page 66 combines the affordable rented and the affordable home ownership need figures, which total 559 affordable dwellings per annum between 2019 and 2037.

### **Summary of affordable housing need**

- 3.10 There is a significant need for affordable housing in Maidstone, as identified in successive assessments of affordable housing need:
- a. The SHMA 2014 identifies a need for 322 affordable dwellings per annum between 2013 and 2031;

- b. The SHMA 2021 Update identifies a need for 559 affordable dwellings per annum between 2019 and 2037.
- 3.11 The significant increase between the two assessments can be explained by the fact that the SHMA 2021 Update also assesses the need for affordable home ownership products (as required in the latest NPPF) and takes account of more recent statistical inputs which show a greater current/existing need for affordable housing and a slower rate of re-lets of existing stock.
- 3.12 Section 4 of this Statement goes on to consider the extent to which these needs are being met in Maidstone Borough.

# Affordable Housing Delivery in Maidstone Borough

## Section 4

- 4.1 This section reviews the past record of affordable housing delivery in Maidstone Borough since the start date of the adopted Local Plan period in 2011/12, and also considers affordable housing delivery since the start of the emerging Local Plan period in 2019/20.

### Past Affordable Housing Delivery

- 4.2 Figure 4.1 below illustrates the net delivery of affordable housing in Maidstone, compared with overall housing delivery, in the eleven years since the start of the adopted Local Plan period in 2011/12. Affordable housing additions are net of Right to Buy losses in the Borough (the gross-to-net calculations are set out at **Appendix 3**).

*Figure 4.1: Net Additions to Affordable Housing Stock, 2011/12 to 2021/22*

| Monitoring Year | Net Overall Housing Completions | Net Affordable Housing Additions | Net Affordable Housing Additions as a %age of Net Overall Housing Completions |
|-----------------|---------------------------------|----------------------------------|---|
| 2011/12         | 873                             | 366                              | 42%   |
| 2012/13         | 630                             | 181                              | 29%   |
| 2013/14         | 425                             | 197                              | 46%   |
| 2014/15         | 582                             | 235                              | 40%   |
| 2015/16         | 521                             | 139                              | 27%   |
| 2016/17         | 1,145                           | 185                              | 16%   |
| 2017/18         | 1,286                           | 294                              | 23%   |
| 2018/19         | 1,146                           | 278                              | 24%   |
| 2019/20         | 1,355                           | 344                              | 25%   |
| 2020/21         | 1,377                           | 402                              | 29%   |
| 2021/22         | 1,627                           | 380                              | 23%   |
| <b>Total</b>    | <b>10,967</b>                   | <b>3,001</b>                     | <b>27%</b>  |
| <b>Average</b>  | <b>997</b>                      | <b>273</b>                       | <b>27%</b>  |

Source: DLUHC Live Tables; Private Registered Provider Statistical Data Returns



- 4.3 Between 2011/12 and 2021/22, a total of 10,967 dwellings were delivered in Maidstone Borough, equivalent to 997 dwellings per annum. Of these, 3,001 dwellings were affordable tenures, equivalent to 273 affordable dwellings per annum. This equates to 27% net affordable housing delivery which is below the 30% to 40% policy expectation in the adopted and emerging Local Plans.

### **Affordable Housing Delivery Compared to Affordable Housing Needs**

SHMA 2014: 322 affordable dwellings per annum between 2013/14 and 2030/31

- 4.4 Figure 4.2 below illustrates net affordable housing delivery compared to the identified affordable housing need of 322 net affordable dwellings per annum that is applicable between 2013/14 and 2030/31, as set out in the SHMA 2014.

*Figure 4.2: Net Additions to Affordable Housing Stock Compared With Needs Identified in the SHMA 2014*

| Monitoring Year | Net Affordable Housing Additions | SHMA 2014 Identified Need: 322 dpa | Surplus / Shortfall | Percentage of Needs Met |
|-----------------|----------------------------------|------------------------------------|---------------------|-------------------------|
| 2013/14         | 197                              | 322                                | -125                | 61%                     |
| 2014/15         | 235                              | 322                                | -87                 | 73%                     |
| 2015/16         | 139                              | 322                                | -183                | 43%                     |
| 2016/17         | 185                              | 322                                | -137                | 57%                     |
| 2017/18         | 294                              | 322                                | -28                 | 91%                     |
| 2018/19         | 278                              | 322                                | -44                 | 86%                     |
| 2019/20         | 344                              | 322                                | 22                  | 107%                    |
| 2020/21         | 402                              | 322                                | 80                  | 125%                    |
| 2021/22         | 380                              | 322                                | 58                  | 118%                    |
| <b>Total</b>    | <b>2,454</b>                     | <b>2,898</b>                       | <b>-444</b>         | <b>85%</b>              |
| <b>Average</b>  | <b>273</b>                       | <b>322</b>                         | <b>-49</b>          | <b>85%</b>              |

Source: See Figure 4.1 above; SHMA 2014

- 4.5 Since the start of the SHMA 2014 period in 2013/14 affordable housing completions (net of Right to Buy) have averaged 273 net affordable dwellings per annum, against a need of 322 net affordable dwellings per annum. A shortfall of -444 affordable dwellings has arisen over the nine-year period, equivalent to an average annual shortfall of -49 affordable dwellings. Overall, 85% of the identified need has been met.

#### SHMA 2021 Update: 559 affordable dwellings per annum

- 4.6 Figure 4.3 below illustrates net affordable housing delivery compared to the affordable housing need of 559 net affordable dwellings per annum between 2019/20 and 2036/37, as set out in the SHMA 2021 Update.

*Figure 4.3: Net Additions to Affordable Housing Stock Compared With Needs Identified in the SHMA 2021 Update*

| Monitoring Year | Net Affordable Housing Additions | SHMA 2021 Update Identified Need: 559 dpa | Surplus / Shortfall | Percentage of Needs Met |
|-----------------|----------------------------------|---|---------------------|-------------------------|
| 2019/20         | 344                              | 559                                       | -215                | 62%                     |
| 2020/21         | 402                              | 559                                       | -157                | 72%                     |
| 2021/22         | 380                              | 559                                       | -179                | 68%                     |
| <b>Total</b>    | <b>1,126</b>                     | <b>1,677</b>                              | <b>-551</b>         | <b>67%</b>              |
| <b>Average</b>  | <b>375</b>                       | <b>559</b>                                | <b>-184</b>         | <b>67%</b>              |

Source: See Figure 4.1 above; SHMA 2021 Update

- 4.7 Since the start of the SHMA 2021 Update period in 2019/20, affordable housing completions (net of Right to Buy) have averaged 375 net affordable dwellings per annum, against a significantly higher need of 559 net affordable dwellings per annum when compared with the preceding SHMA 2014. A shortfall of -551 affordable dwellings has already arisen over the three-year period, equivalent to an average annual shortfall of -184 affordable dwellings. Overall, 67% of the identified need has been met.

#### **Conclusions on Affordable Housing Delivery**

- 4.8 The above evidence demonstrates that Maidstone Borough has achieved a significant number of new affordable homes since the start of the adopted Local Plan period, and that this has increased in recent years. This contrasts with some other authorities in the South East who have failed to maintain up-to-date Development Plans and are not delivering anywhere near enough affordable housing. Nonetheless, the scale of the identified need means that there remains an ongoing and sizeable unmet need for affordable homes in the Borough:
- Against the identified need to deliver 322 affordable dwellings per annum between 2013/14 and 2031/32 as contained in the SHMA 2014, a shortfall of -444 dwellings has arisen in the last nine years; and

- b. Against the higher identified need to deliver 559 affordable dwellings per annum between 2019/20 and 2036/37 contained in the SHMA 2021 Update, a shortfall of -551 affordable dwellings has already arisen in the last three years alone.

4.9 In this context, it is important that Maidstone Borough Council continues to take every opportunity to boost the supply of affordable homes, to help to address existing unmet needs as fast as possible. This includes on emerging allocations, where the Council already accepts the principle of development.

4.10 In light of the identified level of unmet need, there can be no doubt that the delivery of 40% affordable housing or up to 47 affordable dwellings through the proposed development will make an important contribution to the affordable housing needs of Maidstone Borough.

# Affordability Indicators

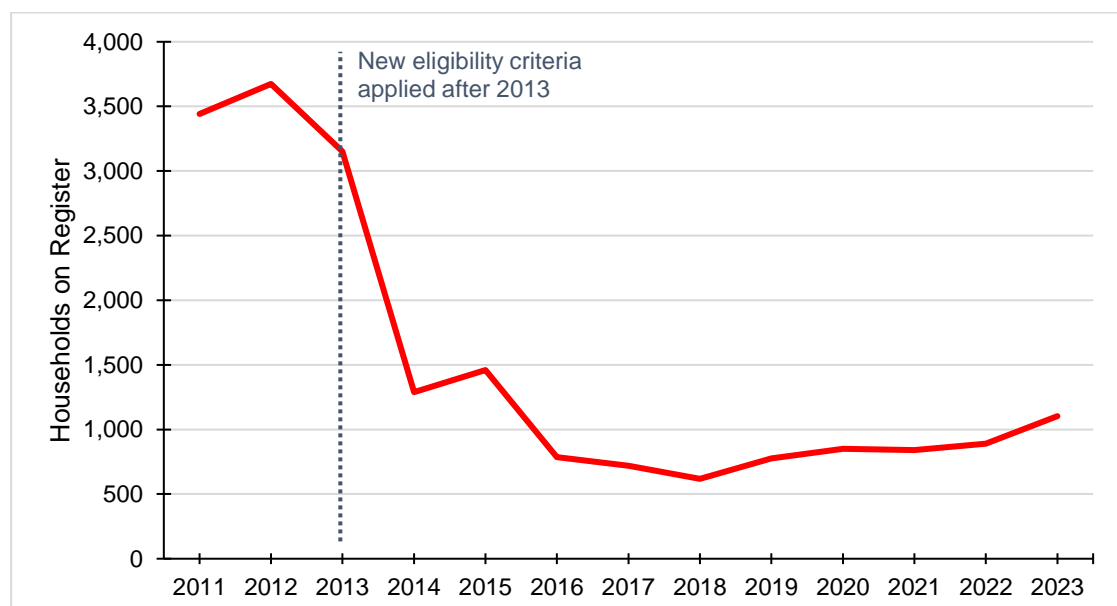
## Section 5

- 5.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. This is in the context of plan making.

### Housing Register

- 5.2 The Council's Homechoice Team has confirmed that **on 14 August 2023, there were 1,138 live applications on the Housing Register** in Maidstone, all of whom have met the qualification criteria under the Housing Allocation Scheme and have been accepted by the Council as being in housing need.
- 5.3 Figure 5.1 below illustrates the extent of the Housing Register since the start of the adopted Local Plan period in 2011. The number of applicants reduced sharply between 2013 and 2014; this coincided with the introduction of a new Housing Allocation Scheme in April 2013 which applies criteria for local connection and housing need. Despite the introduction of these more restrictive qualification criteria, the Housing Register has increased by 84% since 2018 (when the Register stood at 618 households).

*Figure 5.1: Housing Register, 2011 to 2023*



Source: Maidstone Borough Council (see **Appendix 2**)

- 5.4 Strikingly, the Housing Register has increased by 247 households (or 22%) in the last 16 months alone, between April 2022 when it stood at 891 households, and the most recent count in August 2023 of 1,138 households.

### Local Preferences in Marden

- 5.5 The Council has confirmed that of the 1,138 live Housing Register applications, **261 households have selected Marden as one of their preferred areas**. This is equivalent to **23% of the entire register**. Although applicants are not restricted to placing bids in their area of preference, this figure is indicative of the number of households who would consider an affordable home in the Marden local area.

### Waiting Times

- 5.6 Information provided by the Council shows that successful applicants for affordable housing face lengthy waits to be housed, with the waiting time varying depending upon the dwelling size that is required.
- 5.7 Figure 5.2 below shows that over the 2022/23 monitoring period, the average wait to be housed in an affordable home in Maidstone Borough ranges from 4 months for a 2-bed apartment, to as long as 28 months for a 4+ bedroom house.

*Figure 5.2: Waiting Times for Affordable Housing in Maidstone, March 2022 to March 2023*

| Type of affordable property | Average waiting time              |
|-----------------------------|-----------------------------------|
| 1-bed affordable dwelling   | 10 months                         |
| 2-bed affordable dwelling   | 4 months (flat) 10 months (house) |
| 3-bed affordable dwelling   | 20 months                         |
| 4+ bed affordable dwelling  | 28 months                         |

Source: Maidstone Borough Council (see **Appendix 2**)

- 5.8 These are average figures so it is possible that some households have been waiting longer than the times indicated above. The figures also only capture the wait times for successful applicants, those unsuccessful applicants will by proxy face considerably longer waiting times. The longest waits are for family-sized housing of three- and four-bedrooms.

### Bids and Lettings in Marden

- 5.9 The Council is part of the 'Kent Homechoice' choice based lettings scheme, under which applicants can bid for affordable homes advertised on an online portal. Figure

5.3 below demonstrates the average number of bids received per property in Marden over the 2022/23 monitoring period for a range of types of affordable property.

*Figure 5.3: Bids Per Property in Marden, March 2022 to March 2023*

| Type of affordable property | Number of properties advertised | Average bids per property |
|-----------------------------|---------------------------------|---------------------------|
| 1-bed affordable dwelling   | 12                              | 31                        |
| 2-bed affordable dwelling   | 6                               | 9                         |
| 3-bed affordable dwelling   | 4                               | 36                        |
| 4+ bed affordable dwelling  | 0                               | 0                         |

Source: Maidstone Borough Council (see **Appendix 2**)

- 5.10 Figure 5.3 demonstrates that between 1 April 2022 to 31 March 2023 there were 22 affordable housing lettings. There were averages of 31 bids per 1-bed affordable dwelling put up for let in Marden, 9 bids per 2-bed affordable dwelling, and 36 bids per 3-bed affordable dwelling. No 4+ bed affordable dwellings were let at all over the period in Marden.

### **Help to Buy Register**

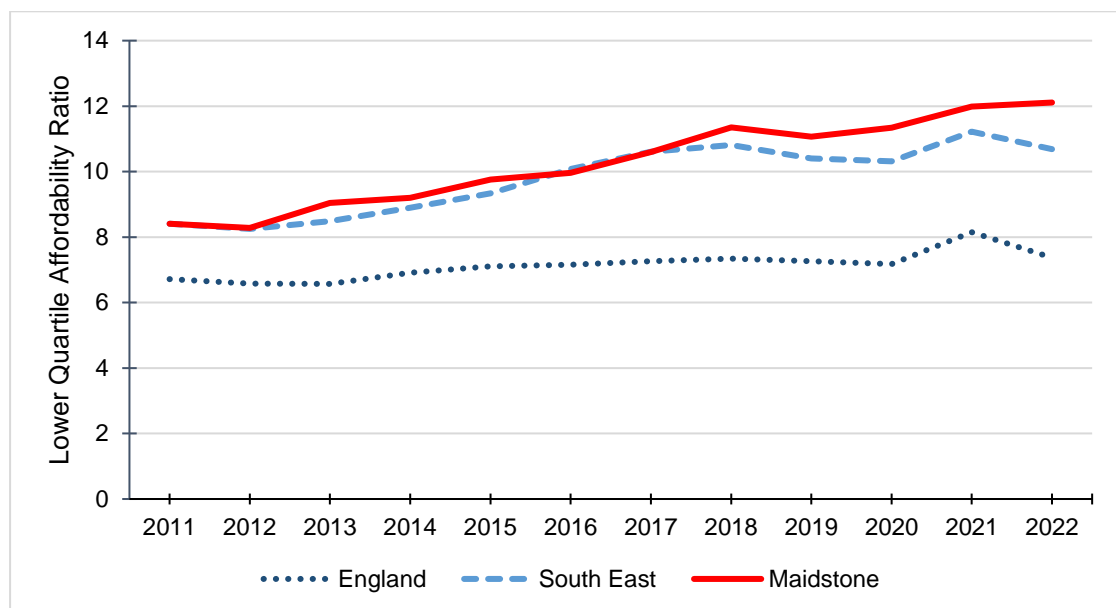
- 5.11 Further evidence in respect of the need for affordable housing across Maidstone Borough is provided in information from Help to Buy South.
- 5.12 Help to Buy South is one of three agents appointed by the Government to manage the Help to Buy initiative as well as other affordable home ownership options including shared ownership. Although the Help to Buy Equity Loan scheme closed at the end of 2022, the extant data from the Help to Buy South system helps to identify the number of households who have registered an interest in affordable home ownership in Maidstone Borough.
- 5.13 The Help to Buy Register shows that on that on 24 March 2023, **1,776 households were seeking a shared ownership home in Maidstone Borough.**

### **Affordability Ratios**

- 5.14 Affordability ratios illustrate the relationship between average house prices and average workplace-based earnings, i.e. how much does a house cost in relation to the earnings of somebody working in Maidstone Borough? For context, mortgage lending is typically offered on up to 4.5 times earnings (and may be lower subject to individual circumstances).

- 5.15 Figure 5.4 illustrates the lower quartile affordability ratio (representative of the 'entry level' of the housing market) in Maidstone Borough. **In 2022 the lower quartile house in the Borough cost 12.11 times lower quartile earnings**; this ratio is 13% higher than in the South East (10.69 times earnings) and 64% higher than in England as a whole (7.37 times earnings). It is also 169% higher than the 'benchmark' of 4.5 times earnings for mortgage lending. Clearly, without access to substantial savings, equity, or inherited wealth, households face a serious challenge in accessing housing on the open market.

*Figure 5.4: Lower Quartile Affordability Ratio, Maidstone Borough, 2011 to 2022*



Source: Office for National Statistics

- 5.16 Since the base date of the adopted Local Plan in 2011, the lower quartile affordability ratio in Maidstone Borough has worsened by 44%. This is faster than in the South East (27% increase) and in England as a whole (10% increase). As figure 5.4 shows, the lower quartile affordability ratio in Maidstone tracked around that of the South East region until around 2017, after which it overtook the regional figure and has remained higher ever since.

### Lower Quartile House Prices

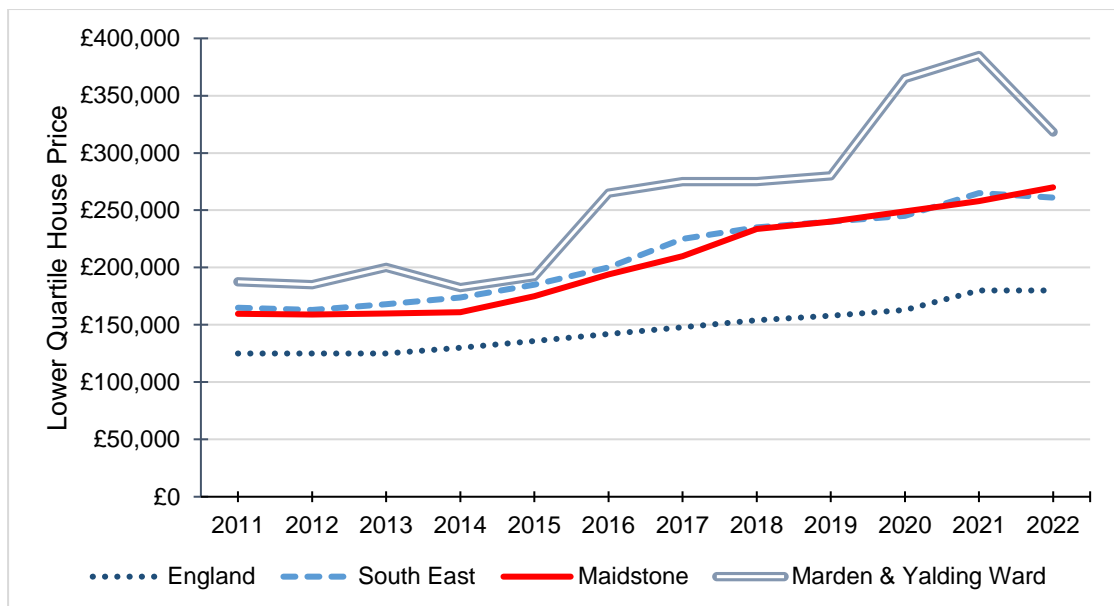
- 5.17 Figure 5.5 below illustrates lower quartile house sale prices in Maidstone Borough and in the Marden & Yalding council ward. In 2022, the lower quartile selling price in Maidstone was £270,000. This is:

- £9,000 (or 3%) more than the South East lower quartile selling price of £261,000; and

- b. £90,000 (or 50%) more than the England lower quartile selling price of £180,000.

5.18 In Marden & Yalding Ward in 2022, the lower quartile selling price was £318,360, which is £48,360 (or 18%) higher still than in Maidstone Borough. The lower quartile selling price here is also £57,360 (or 22%) higher than in the South East, and £138,360 (or 77%) more than in England as a whole.

*Figure 5.5: Lower Quartile House Prices, Maidstone Borough and Marden & Yalding Ward, 2011 to 2022*



Source: House Price Statistics for Small Areas

5.19 Since the base date of the adopted Local Plan in 2011, the lower quartile house price in Maidstone Borough has increased by 69%; this is faster than in the South East (58% increase) and England as a whole (44% increase). In Marden & Yalding Ward, the median house price increased by 70% over the same period, in line with the trend seen across Maidstone Borough as a whole.

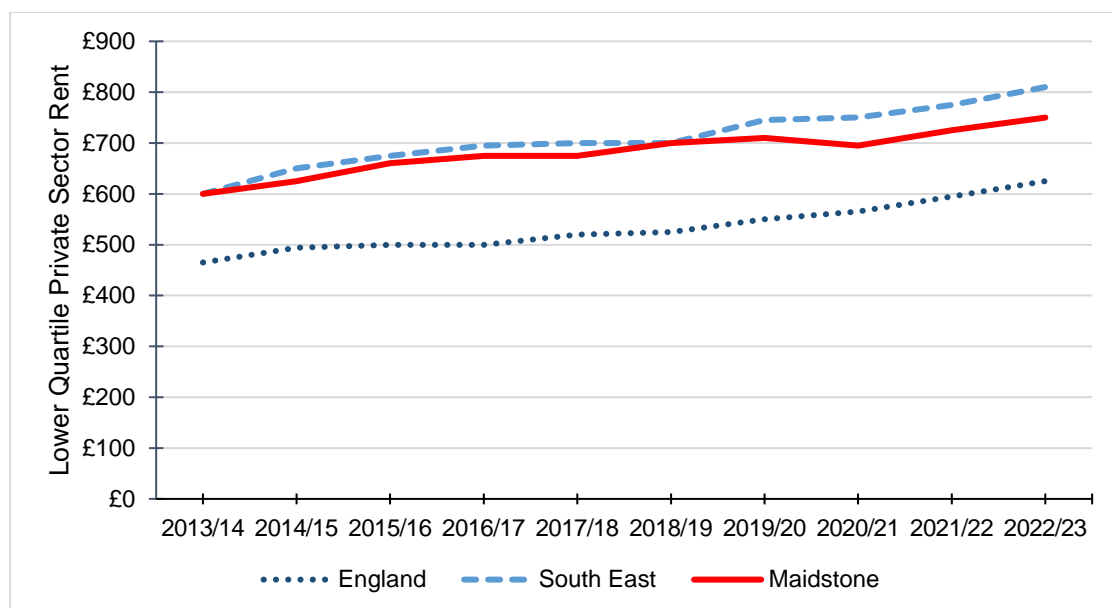
### Lower Quartile Private Sector Rents

5.20 Figure 5.6 below illustrates lower quartile private sector monthly rents for Maidstone Borough from 2013/14 onwards (the first year for which rental data is available). **In 2022/23, the lower quartile private sector monthly rent in Maidstone was £750.** This is:

- a. £60 (or 7%) cheaper than the South East lower quartile rent of £810; but
- b. £125 (or 20%) more than the England lower quartile rent of £625.



Figure 5.6: Lower Quartile Private Sector Rents, Maidstone Borough, 2011 to 2022



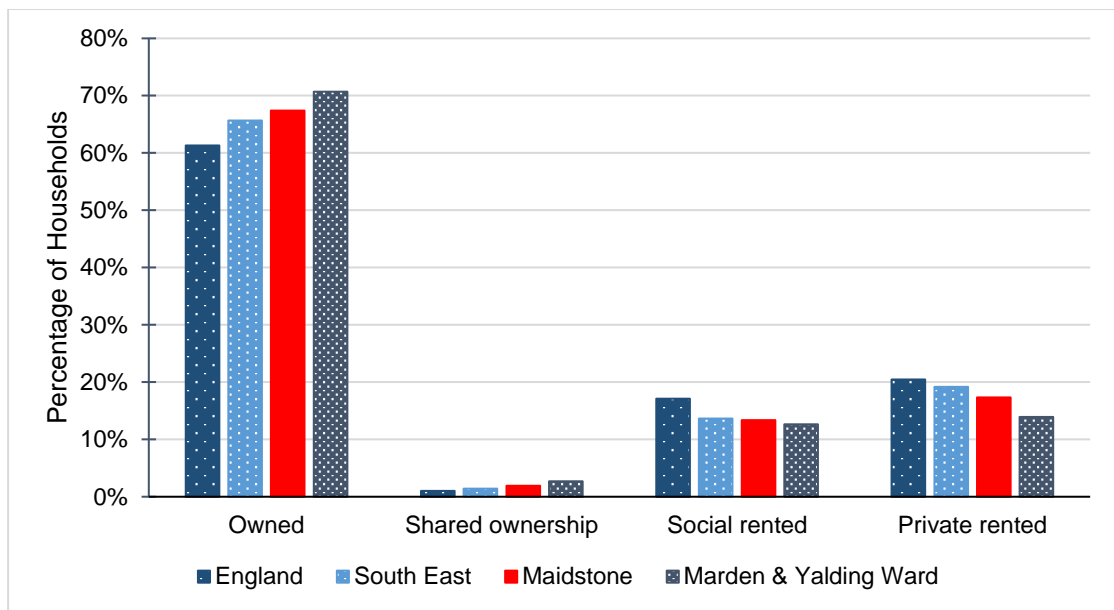
Source: Office for National Statistics and Valuation Office Agency

- 5.21 Since the base date of the adopted Local Plan in 2011, the lower quartile private sector rent in Maidstone Borough has increased by 25%; this is slower than in the South East (35% increase) and England as a whole (34% increase) but the rents payable remain well above the national lower quartile figure. The lower quartile rent in Maidstone fell slightly between 2019/20 and 2020/21 but since then has continued to increase at a similar rate to the South East and England.

### Tenure

- 5.22 The 2021 Census, published in January 2022, shows that the tenure profile of Maidstone Borough is similar to that of the South East region, but leans more towards home ownership and away from rented tenures when compared with England as a whole. In Maidstone, home ownership accounts for 67% of households (compared with 61% in England) and social renting accounts for 13% of households (compared with 17% in England)

Figure 5.7: Tenure, Maidstone Borough and Marden & Yalding Ward, 2021



Source: Census 2021. Households living rent free not shown as these account for <1% of households at all levels.

- 5.23 Similar trends can be seen in Marden & Yalding Ward, where home ownership accounts for 71% of households and social renting accounts for 13% of households.
- 5.24 Shared ownership accounts for a limited proportion of households at all geographic levels, at 1% in England, 2% in Maidstone and 3% in Marden & Yalding Ward.

### Conclusions on Affordability Indicators

- 5.25 As demonstrated through the analysis in this section, there are serious housing affordability challenges in Maidstone Borough, in common with the South East region, which are characterised by increasing waiting lists, high housing costs and worsening affordability ratios. The Marden local area is a particularly expensive part of the Borough.
- 5.26 In the context of such significant pressure in the housing market, it is important that more affordable homes are delivered (for rent and for home ownership) to assist those who are currently experiencing the real-life impacts of the affordability crisis as soon as possible, and to reduce the time spent waiting for an affordable home.

# Conclusions

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## Section 6

6.1 To recap, the Applicant, Rydon Homes, proposes the development of up to 117 dwellings, of which 40% or up to 47 dwellings will be affordable, at land east of Albion Road and north of Copper Lane, Marden, in Maidstone Borough. This level of provision meets the requirements of both adopted Local Plan policy SP20, and emerging Local Plan policy LPRSP10(B). The site benefits from an emerging allocation in the Local Plan Review (reference LPRSA295).

6.2 This section draws the analysis in this Statement together to reach conclusions on three key issues, namely the existing housing shortfall; the affordability challenge in Maidstone; and the positive contribution that the proposed development will make towards meeting the housing needs of residents in Maidstone Borough.

### **Key issue 1: Tackling the Existing Affordable Housing Shortfalls**

6.3 The analysis of affordable housing delivery in Section 4 of this Statement shows that there have been shortfalls in the delivery of affordable housing in Maidstone when compared with identified needs.

- a. Against the affordable housing need of 322 net affordable dwellings per annum between 2013/14 and 2030/31 as set out in the SHMA 2014, a shortfall of -444 affordable dwellings has arisen over the nine years to date, and 85% of the identified need has been met.
- b. Against the affordable housing need of 559 net affordable dwellings per annum between 2019/20 and 2036/37 as set out in the SHMA 2021 Update, a shortfall of -551 affordable dwellings has arisen over the first three years alone, and 67% of the identified need has been met.

6.4 It is important to note that the SHMA 2021 Update identifies a much higher level of affordable housing need than the previous SHMA 2014, because it takes account of the latest definition of affordable housing contained in the NPPF and identifies the need for affordable home ownership products as a separate element of housing need. The SHMA 2021 Update is also calculated using more recent statistical inputs than in the SHMA 2014.

- 6.5 The Council is making progress towards meeting its affordable housing needs, and in recent years the rate of affordable housing delivery has improved across the Borough. However, because the identified need has increased significantly between the 2014 and 2021 iterations of the SHMA, it is vital to boost the supply of affordable housing so the Council stands the best chance of recovering past shortfalls and meeting its affordable housing need to the greatest possible extent.

### **Key issue 2: Responding to the Affordability Challenge**

- 6.6 Like many authorities in the South East, Maidstone Borough Council faces serious affordability challenges as exemplified by the following indicators:
- a. A housing register of 1,138 households on 14 August 2023, all of whom have been accepted by the Council as having an affordable housing need and a demonstrable local connection to Maidstone Borough;
  - b. Of these, 261 households have expressed a locational preference for Marden (i.e. 22% of the Register);
  - c. Lengthy waiting times for affordable housing of up to 20 months for a three-bed affordable home and 28 months for a four-bed affordable home;
  - d. A Help to Buy register of 1,776 households on 24 March 2023;
  - e. A lower quartile affordability ratio of 12.11 - higher than the national and South East ratios;
  - f. Lower quartile house prices in Maidstone Borough of £270,000 and £318,360 in Marden & Yalding ward, both in excess of the South East and national lower quartile;
  - g. Lower quartile private sector rents of £750, or £125 more than in England;
  - h. A tenure split in Marden and Yalding Ward that skews towards home ownership and away from rented tenures, when compared with the national tenure split.
- 6.7 All these factors combine to create a challenging situation for anybody in need of affordable housing to rent or to buy in the Borough. By contrast, the provision of up to 47 affordable homes for rent and for affordable home ownership, secured through a Section 106 agreement, provides eligible households with reduced housing costs; an energy-efficient, high quality and modern home; and greater security of tenure than in the private rented sector.

### **Key issue 3: The Positive Contribution of More Affordable Housing**

- 6.8 As both the adopted and emerging Local Plans demonstrate, the delivery of affordable housing is an important priority of the Council. Whilst some other authorities in the South East are relying upon dated Development Plans and delivering low levels of affordable housing, Maidstone Borough Council is progressing a new Local Plan which offers a plan-led route towards meeting the Borough's pressing housing needs.
- 6.9 The proposed development offers the opportunity to deliver up to 47 affordable homes to help meet identified needs. This site *alone* could contribute:
- a. Equivalent of 15% of the annual need for 322 affordable dwellings set out in the SHMA 2014; and
  - b. Equivalent of 8% of the annual need for 559 affordable dwellings set out in the SHMA 2021 Update.
- 6.10 In light of the lengthy and increasing Housing Register; the extent of local preferences, and the lengthy Help to Buy Register, there can be little doubt that each of the (up to) 47 proposed affordable dwellings will be occupied by a household in need.
- 6.11 The Council has the opportunity to take positive action to address the housing challenge in Maidstone, through the grant of planning permission for more affordable homes. The proposed development comes forward on an emerging allocation site; where the principle of development is accepted by the Council; and where there is a leading housebuilder that is committed to bringing forward these much needed affordable homes as soon as possible.

### **Recommendations**

- 6.12 The proposed development will make a substantial contribution to the delivery of affordable housing, through the provision of up to 47 affordable homes, or 40% of the total number of dwellings, to be secured through a Section 106 agreement.
- 6.13 The benefit of new affordable housing will be significant. Improving the supply of affordable homes will mean that households needing affordable housing will spend less time on the waiting list and in unsuitable accommodation. This will improve the lives of those real households in Maidstone Borough who will benefit from the provision of high quality, affordable homes that meet their needs.

- 6.14 The proposed development will also mean the Council will be better placed to address the most severe housing issues such as those households facing crisis through homelessness or forced to turn to temporary accommodation.
- 6.15 In summary, the proposed development will:
- a. Help the Council to meet its identified affordable housing need and recover past shortfalls as soon as possible;
  - b. Meet the needs of a wide range of households including those in priority need and those seeking to purchase but who are currently prevented from doing so; and
  - c. Deliver tangible benefits through better housing for real people in real need, now.
- 6.16 Tetlow King Planning therefore recommends that the proposed affordable housing is an important and weighty material consideration that should carry **at least substantial weight in the planning balance**. By granting planning permission as soon as possible, the Council can facilitate the prompt delivery of these much-needed new homes.

# Appendix 1

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Correspondence with the Homechoice Team – Housing Mix



## **Land at Albion Road and Copper Lane, Marden**

### **Preferred Affordable Housing Mix**

The proposal is for the potential delivery of 124 new homes on this site, with 50 (40%) provided as affordable housing. Of the affordable housing provision, 13 (26%) will be offered as First Homes under the Government's discounted market housing scheme. For the remaining 37 units of affordable housing, two alternative proposals are suggested by the applicant:

- 1) Submitted Maidstone Local Plan Review – policy LPRSP10(B) – Under this emerging policy the proposal is the delivery of 13 x First Homes, 19 x Affordable Rent homes and 18 x Social Rent homes. For this Local Plan Review policy, the proposals for the tenure split would be:

- 13 x First Homes
- 19 x Affordable rent
- 18 x Social Rent
- 0 x Shared Ownership

- 2) Adopted Maidstone Local Plan ( Policy SP20) – Under this adopted policy, the would still propose 13 First Homes to accord with current government requirements (NPPF 2021). For this adopted policy the proposals for the tenure split would be:

- 13 x First Homes
- 19 x Social Rent
- 14 x Affordable Rent
- 4 x Shared Ownership

Maidstone Borough Council's Affordable and Local Needs Housing Supplementary Planning Document provides details of the indicative requirements for the appropriate mix of affordable housing at paragraph 6.4 as:

|           |                   |
|-----------|-------------------|
| 30% -35%  | 1- bed properties |
| 30% - 35% | 2-bed properties  |
| 25% - 30% | 3-bed properties  |
| 5% - 10%  | 4+ bed properties |

The current demand from applicants on Maidstone Borough Council's housing register (as at 1 July 2022) is:

- 40% require 1 bed
- 15% require 2 beds
- 35% require 3 beds
- 10% require 4+ beds



Looking at the demand on the housing register for applicants who have indicated a preference for housing in the Marden and Yalding areas provides similar ratios to the register as a whole:

**Table 1: Demand in Marden**

| Band         | 1 bed           | 2 bed           | 3 bed           | 4 bed          | 5+ bed        | Total           |
|--------------|-----------------|-----------------|-----------------|----------------|---------------|-----------------|
| C            | 23              | 10              | 30              | 8              | 2             | <b>73 (37%)</b> |
| H            | 29              | 6               | 12              | 4              | 0             | <b>51 (26%)</b> |
| M            | 8               | 5               | 5               | 0              | 0             | <b>18 (9%)</b>  |
| R            | 24              | 8               | 21              | 2              | 0             | <b>55 (28%)</b> |
| <b>Total</b> | <b>84 (43%)</b> | <b>29 (15%)</b> | <b>68 (35%)</b> | <b>14 (7%)</b> | <b>2 (1%)</b> | <b>197</b>      |

**Table 2: Demand in Yalding**

| Band         | 1 bed           | 2 bed           | 3 bed           | 4 bed          | 5+ bed        | Total           |
|--------------|-----------------|-----------------|-----------------|----------------|---------------|-----------------|
| C            | 25              | 13              | 32              | 9              | 2             | <b>81(37%)</b>  |
| H            | 31              | 8               | 10              | 3              | 0             | <b>52 (24%)</b> |
| M            | 8               | 5               | 4               | 0              | 0             | <b>17 (8%)</b>  |
| R            | 26              | 6               | 30              | 3              | 3             | <b>68 (31%)</b> |
| <b>Total</b> | <b>90 (41%)</b> | <b>32 (15%)</b> | <b>76 (35%)</b> | <b>15 (7%)</b> | <b>5 (2%)</b> | <b>218</b>      |

Adjoining areas including Nettlestead, Hunton, Linton, Boughton Monchelsea and Staplehurst show similar demand trends, possibly because a large number of applicants select a preference for all areas of the borough.

**Proposed development of 37 AH properties includes:**

Option 1: 19 x affordable rent plus 18 x social rent

Option 2: 14 x affordable rent plus 19 x social rent plus 4 x shared ownership

**Table 3: Suggested property size/tenure to reflect the requirements of Affordable Housing Supplementary Planning Document**

| Beds         | Ratio  | No of units | Option1 Affordable rent | Option 1 Social rent | Option 2 Affordable rent | Option 2 Social rent | Option 2 Shared Ownership |
|--------------|--------|-------------|-------------------------|----------------------|--------------------------|----------------------|---------------------------|
| 1            | 30-35% | 12          | 6                       | 6                    | 5                        | 7                    | 0                         |
| 2            | 30-35% | 12          | 6                       | 6                    | 5                        | 5                    | 2                         |
| 3            | 25-30% | 10          | 5                       | 5                    | 4                        | 4                    | 2                         |
| 4            | 5-10%  | 3           | 2                       | 1                    | 0                        | 3                    | 0                         |
| <b>Total</b> |        | <b>37</b>   | <b>19</b>               | <b>18</b>            | <b>14</b>                | <b>19</b>            | <b>4</b>                  |

**Table 4: Suggested property size/tenure to reflect requirements of current demand**

| Beds         | Ratio | No of units | Option1 Affordable rent | Option 1 Social rent | Option 2 Affordable rent | Option 2 Social rent | Option 2 Shared Ownership |
|--------------|-------|-------------|-------------------------|----------------------|--------------------------|----------------------|---------------------------|
| 1            | 42%   | 15          | 8                       | 7                    | 7                        | 8                    | 0                         |
| 2            | 15%   | 6           | 3                       | 3                    | 2                        | 2                    | 2                         |
| 3            | 35%   | 13          | 6                       | 7                    | 5                        | 6                    | 2                         |
| 4            | 8%    | 3           | 2                       | 1                    | 0                        | 3                    | 0                         |
| <b>Total</b> |       | <b>37</b>   | <b>19</b>               | <b>18</b>            | <b>14</b>                | <b>19</b>            | <b>4</b>                  |

Maidstone Borough Council's preference for this development is the suggested property size/tenure split set out in Table 4.

In terms of person sizes per unit, we would prefer:

- all one bed units to be suitable for two persons,
- a mix of 2 bed 3 person and 2 bed 4 person units
- a mix of 3 bed 5 person and 3 bed 6 person units
- a mix of 4 bed 7 person and 4 bed 8 person units

Lynn Wilders  
Housing Enabling Assistant

## Appendix 2

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Correspondence with the Homechoice Team – Housing  
Register Data

## RE: Maidstone Affordable Housing Statistics

Lynn Wilders <LynnWilders@Maidstone.gov.uk>

Mon 14/08/2023 15:52

To: Jamie Roberts <Jamie.Roberts@tetlow-king.co.uk>

Cc: Matthew Bunt <matthew.bunt@tetlow-king.co.uk>; Iwan Evans <Iwan.Evans@tetlow-king.co.uk>; James Stacey <James.Stacey@tetlow-king.co.uk>

Hi Jamie

I have provided the information requested below. Please let me know if there is anything further you need.

Kind regards

### Lynn Wilders

Housing Enabling Assistant

Homechoice Team

Housing and Community Services

Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ

t 01622 602723 w [www.maidstone.gov.uk](http://www.maidstone.gov.uk)

---

**From:** Jamie Roberts <Jamie.Roberts@tetlow-king.co.uk>

**Sent:** 14 August 2023 14:40

**To:** Lynn Wilders <LynnWilders@Maidstone.gov.uk>

**Cc:** Matthew Bunt <matthew.bunt@tetlow-king.co.uk>; Iwan Evans <Iwan.Evans@tetlow-king.co.uk>; James Stacey <James.Stacey@tetlow-king.co.uk>

**Subject:** Re: Maidstone Affordable Housing Statistics

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Good afternoon Lynn,

Thanks for the email and for those initial stats - that's really useful and some extra figures would be very helpful indeed. What we're hoping to understand is a snapshot of current demands/pressures on the Housing Register, to illustrate the case for the proposed affordable housing at the emerging allocation site.

**Firstly** - can you advise on where we'd find the Council's affordable housing completions data since the start of the Core Strategy period in 2006? We're minded to use the Central Government live tables as a reference, but want to check if the Council uses different data to this? [Gov.uk live tables](#)

**Secondly** - we have some queries about the housing register, I set these out below and include a few tables that should hopefully speed up the process.

- 1) The current number of applicants on the housing waiting list across the Borough **1138 live applications as at 14.8.23**
- 2) If the data is available, the number of applicants on the waiting list back on 31 March 2023. **1102 live applications as at 31.3.23**
- 3) The current number of local preferences in the Marden local area **of the 1138 current live applications, 261 applicants have selected Marden as one of their preferred areas in the borough, including 5 applicants who have selected Marden only. This figure is purely indicative, as applicants are not restricted in areas when placing bids, and some may place bids on properties in areas that they have not indicated a preference for on their application.**
- 4) The average waiting time across the Borough in the period 2022/23 (or in the last 12 months) **average waiting times of all applicants who were rehoused from the housing register between 01.04.22 and 31.03 2023:**

| Type of affordable property | Maidstone Borough    |
|-----------------------------|----------------------|
|                             | Average waiting time |

|                            |                                   |
|----------------------------|-----------------------------------|
| 1-bed affordable dwelling  | 10 months                         |
| 2-bed affordable dwelling  | 4 months (flat) 10 months (house) |
| 3-bed affordable dwelling  | 20 months                         |
| 4+ bed affordable dwelling | 28 months                         |

5) The number of properties advertised, and the average number of bids per property, in Marden in the period 2022/23 (or in the last 12 months)

Numbers of affordable housing properties let in Marden (postcode area TN12 9\*\*) between 01.04.2022 and 31.03.2023

| Type of affordable property | Marden                          |                           |
|-----------------------------|---------------------------------|---------------------------|
|                             | Number of properties advertised | Average Bids per Property |
| 1-bed affordable dwelling   | 12                              | 31                        |
| 2-bed affordable dwelling   | 6                               | 9                         |
| 3-bed affordable dwelling   | 4                               | 36                        |
| 4+ bed affordable dwelling  | 0                               | 0                         |

I hope the above is clear but let me know if you've got any questions. I look forward to hearing from you.

With kind regards,

Jamie

**Jamie Roberts MPlan MRTPI**  
Principal Planner  
TETLOW KING PLANNING



**E:** [jamie.roberts@tetlow-king.co.uk](mailto:jamie.roberts@tetlow-king.co.uk) **T:** 0117 9561916 **M:** 07880 186640 **W:** [tetlow-king.co.uk](http://tetlow-king.co.uk)

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**From:** Lynn Wilders <[LynnWilders@Maidstone.gov.uk](mailto:LynnWilders@Maidstone.gov.uk)>

**Sent:** 14 August 2023 09:32

**To:** Jamie Roberts <[Jamie.Roberts@tetlow-king.co.uk](mailto:Jamie.Roberts@tetlow-king.co.uk)>; [rachelbennett@maidstone.gov.uk](mailto:rachelbennett@maidstone.gov.uk) <[rachelbennett@maidstone.gov.uk](mailto:rachelbennett@maidstone.gov.uk)>

**Cc:** Matthew Bunt <[matthew.bunt@tetlow-king.co.uk](mailto:matthew.bunt@tetlow-king.co.uk)>; Iwan Evans <[Iwan.Evans@tetlow-king.co.uk](mailto:Iwan.Evans@tetlow-king.co.uk)>; James Stacey <[James.Stacey@tetlow-king.co.uk](mailto:James.Stacey@tetlow-king.co.uk)>

**Subject:** RE: Maidstone Affordable Housing Statistics

Good morning Jamie

I can provide data from our Housing Register in terms of the breakdown of applicants, bidding, demand/supply of affordable housing etc. For example, the current (as at 1.8.23) bedroom need of applicants on the housing register is:

1 bed = 38%  
2 bed = 17%  
3 bed = 36%  
4 bed = 7%  
5+ bed = 2%

Of the properties let to households in 2023/24 (as at 1.8.23) the following breakdown applies:

1 bed = 43%  
2 bed = 44%  
3 bed = 11%  
4 bed = 1%

Please let me know what additional data you require.

Kind regards

**Lynn Wilders**

Housing Enabling Assistant

Homechoice Team

Housing and Community Services

Maidstone Borough Council, Maidstone House, King Street, Maidstone, Kent, ME15 6JQ

t 01622 602723 w [www.maidstone.gov.uk](http://www.maidstone.gov.uk)

---

**From:** Jamie Roberts <[Jamie.Roberts@tetlow-king.co.uk](mailto:Jamie.Roberts@tetlow-king.co.uk)>

**Sent:** 11 August 2023 13:22

**To:** Lynn Wilders <[LynnWilders@Maidstone.gov.uk](mailto:LynnWilders@Maidstone.gov.uk)>; [rachelbennett@maidstone.gov.uk](mailto:rachelbennett@maidstone.gov.uk)

**Cc:** Matthew Bunt <[matthew.bunt@tetlow-king.co.uk](mailto:matthew.bunt@tetlow-king.co.uk)>; Iwan Evans <[Iwan.Evans@tetlow-king.co.uk](mailto:Iwan.Evans@tetlow-king.co.uk)>; James Stacey <[James.Stacey@tetlow-king.co.uk](mailto:James.Stacey@tetlow-king.co.uk)>

**Subject:** Maidstone Affordable Housing Statistics

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Dear Rachel, Lynn,

I hope this email finds you well. I understand that you have been in pre-application discussions with Rydon Homes in respect of the site they are promoting at Marden, which is a draft allocation in the emerging Local Plan. I wanted to get in touch as we are instructed to look at affordable housing matters, and would like to ask if you are able to supply some of the data that we need for our analysis?

By way of introduction, Tetlow King Planning has been asked by Rydon to research matters relating to affordable housing delivery, needs, and affordability in Maidstone, in order to make the positive case for the affordable homes that could be delivered through the allocation. As a company we specialise in affordable housing (amongst other areas) and are keen to articulate the benefits of new affordable homes through our work.

Quite often with other councils where we need this data, we seek an FoI request, but to save us all the time and effort I'd prefer to avoid going down that formal route if we can help it. Could we set up a quick phone call next week, to discuss the data that you might be able to share with us? Principally, we are looking for data in respect of the housing register, number of preferences, bids, waiting times etc; and housing completions data (as we can see that different datasets appear to report different levels of affordable completions in the Borough).

I look forward to hearing from you,

With kind regards,

**Jamie Roberts MPlan MRTPI**  
**Principal Planner**  
TETLOW KING PLANNING



---

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## Appendix 3

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### Gross-to-Net Affordable Housing Delivery Calculations



# Calculation of Net Affordable Housing Delivery in Maidstone Borough

## Appendix 3

The below table calculates the net affordable housing additions in Maidstone Borough District, which are discussed in Section 4 of this Statement.

To arrive at the net affordable housing additions, Right to Buy sales are deducted from gross affordable housing completions (to reflect the fact these dwellings are lost permanently from the affordable housing stock). Maidstone Borough Council is not a stock-holding authority and the affordable housing in the Borough is held by Registered Providers, who report on Right to Buy sales through statistical data returns. It is possible for Councils to use receipts from Right to Buy sales to purchase existing dwellings for use as affordable housing, although Maidstone Borough Council has not made any such acquisitions.

*Figure: Calculation of Net Additions to Affordable Housing Stock, 2011/12 to 2021/22*

| Monitoring Year | Gross Affordable Housing Completions | Right to Buy sales (Local Authority stock) | Right to Buy sales (Registered Provider stock) | Acquisitions of Existing Homes with Right to Buy Receipts | Net Affordable Housing Additions |
|-----------------|--------------------------------------|--|--|---|----------------------------------|
| 2011/12         | 369                                  | 0  | -3   | Not available   | 366                              |
| 2012/13         | 198                                  | 0  | -17  | Not available   | 181                              |
| 2013/14         | 210                                  | 0  | -13  | Not available   | 197                              |
| 2014/15         | 249                                  | 0  | -14  | Not available   | 235                              |
| 2015/16         | 173                                  | 0  | -34  | Not available   | 139                              |
| 2016/17         | 200                                  | 0  | -15  | Not available   | 185                              |
| 2017/18         | 302                                  | 0  | -8   | 0   | 294                              |
| 2018/19         | 289                                  | 0  | -11  | 0   | 278                              |
| 2019/20         | 357                                  | 0  | -13  | 0   | 344                              |
| 2020/21         | 408                                  | 0  | -6   | 0   | 402                              |
| 2021/22         | 387                                  | 0  | -7   | 0   | 380                              |
| <b>Total</b>    | <b>3,142</b>                         | <b>0</b>                                   | <b>-141</b>                                    | <b>0</b>  | <b>3,001</b>                     |
| <b>Average</b>  | <b>286</b>                           | <b>0</b>                                   | <b>-13</b>                                     | <b>0</b>  | <b>273</b>                       |

Source: DLUHC Live Tables; Private Registered Provider Statistical Data Returns