

Affordable Housing Statement

Land east of Albion Road and North of Copper Lane,
Marden, Maidstone Borough

Affordable Housing Statement

Outline application with some matters reserved (access only sought) for the removal of 2 former agricultural sheds and erection of up to 117no. dwellings and associated infrastructure including partial footways on Albion Road.

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

Maidstone Borough

B.Yond Homes (formerly Rydon Homes)

June 2024

LPA REF: 23/504068/OUT

OUR REF: M23/0715-02.RPT

TETLOW KING PLANNING
UNIT 2, ECLIPSE OFFICE PARK, HIGH STREET, STAPLE HILL, BRISTOL, BS16 5EL
Tel: 0117 9561916 Email: all@tetlow-king.co.uk

www.tetlow-king.co.uk

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Appendices

- Appendix 1 Correspondence with the Homechoice Team – Housing Mix
- Appendix 2 Correspondence with the Homechoice Team – Housing Register Data
- Appendix 3 Gross-to-Net Affordable Housing Delivery Calculations

Introduction

Section 1

- 1.1 This **Affordable Housing Statement** has been prepared by Tetlow King Planning on behalf of the Appellant, B.Yond Homes (formerly Rydon Homes), in respect of the appeal against Maidstone Borough Council to refuse planning permission for residential development at land east of Albion Road and north of Copper Lane, Marden.
- 1.2 Outline planning permission (with all matters reserved except access) is sought for up to 117 dwellings and associated infrastructure, of which **40% or up to 47 dwellings will be affordable**. The description of development as set out on the application forms is as follows:
- “Outline application with some matters reserved (access only sought) for the removal of 2 former agricultural sheds and erection of up to 117no. dwellings and associated infrastructure including partial footways on Albion Road.”*
- 1.3 For administrative purposes, the Local Planning Authority is Maidstone Borough Council (“Maidstone” or “the Council”) within the South East region. The appeal site is located within the Marden & Yalding council ward.
- 1.4 The proposed **40% affordable housing represents a policy compliant offer** which meets the policy expectation for 40% affordable housing as set out in policy LPRSP10(B) ‘Affordable Housing’ of the Local Plan Review (2021 to 2038). The proposed affordable housing will be secured through a Section 106 planning obligation.
- 1.5 The mix of dwelling sizes and types will be confirmed at the reserved matters stage; however, 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+ bedroom
Number of dwellings	16	15	12	4
% of dwellings	34%	32%	26%	8%

Source: Rydon Homes

- 1.6 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.
- 1.7 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 affects many of the Borough's residents.
- 1.8 This 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, which carries substantial weight in the planning balance.
- 1.9 It is important to note that the application site has been proposed as an allocation (reference LPRSA295) in the Council's recently adopted Local Plan Review. This indicates that the Council has already accepted the principle of development at this site, and that it has already been found sound by the Local Plan independent examining inspector. This appeal 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.
- 1.10 This Statement is an update to Tetlow King Planning's previous Affordable Housing Statement, dated August 2023, submitted with the original outline planning application. This updated Statement incorporates a range of updated data and updates to planning policy.

- 1.11 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.
- 1.12 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.
- 1.13 This Affordable Housing Statement comprises the following six 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

Section 2

Introduction

- 2.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the appeal 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 Local Plan Review 2021 to 2038 (adopted March 2024) and the Marden Neighbourhood Plan 2017 to 2031 (made July 2020).
- 2.3 The Local Plan Review replaces the Maidstone Borough Local Plan (2017), although some of the adopted Local Plan 2017 site-specific allocations have been retained.
- 2.4 Other material considerations include the National Planning Policy Framework (2023), 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

Local Plan Review (2021 to 2038)

- 2.5 The Maidstone Local Plan Review covers the seventeen-year period from 2021 to 2038.
- 2.6 Meeting housing needs “*by delivering affordable housing*” is identified as a ‘Spatial Objective’ of the Local Plan Review at page 25.
- 2.7 Policy LPRSS1 ‘Maidstone Borough Spatial Strategy’ is an evolution of the overall strategy contained within the former Local Plan 2017. Page 33 outlines at paragraph 5.39 that it expects the provision of a minimum of 19,669 new dwellings between 2021 and 2038, through the granting of planning permissions and the allocation of sites. The Policy does not set a target for the delivery of affordable homes.
- 2.8 Policy LPRSP6 ‘Rural Service Centres’ identifies Marden as a rural service centre at page 92.

2.9 Policy LPRSP6(E) 'Marden' at page 106 concerns the settlement of Marden, setting a housing target amongst other expectations. The policy identifies the appeal site to be appropriate for the delivery of approximately 113 new homes under site allocation LPRSA295.

2.10 Regarding affordable housing, Policy LPRSP10(A) 'Housing Mix' states on page 138 and 139:

"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".

2.11 Paragraph 7.16 of the Local Plan Review discusses the overall affordable housing need in Maidstone and its supporting evidence. It states on page 139:

"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).

2.12 Pages 142 to 144 of the Local Plan Review outline policy LPRSP10(B) 'Affordable Housing' stating:

Policy LPRSP10(B) 'Affordable Housing'

1. *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.*
2. *The target rates for affordable housing provision within the following geographical areas, as defined on the policies map, are:*
 - a) *Greenfield development in mid and high value zones at 40%*
 - b) *Brownfield development in high value zone at 40%.*
 - c) *Development in the low value zone and brownfield development in the mid value zone will be expected to deliver an element of on-site affordable housing. If it can be demonstrated through an open book financial appraisal this is not viable, based on the construction costs based on delivering high quality design and public realm, then the developer shall make a proportionate off-site contribution to the delivery of affordable housing. Evidence of engagement with affordable housing funders and providers, including the council and Homes England as appropriate, should be submitted with the financial appraisal.*
3. *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:*
 - b) *An identified off-site scheme;*
 - c) *The purchase of dwellings off-site; or*
4. *A financial contribution towards off-site affordable housing. The indicative targets for tenure are:*
 - a) *75% Social and affordable rented.*
 - b) *25% intermediate or affordable home ownership*
5. *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.*
6. *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 Use Class C3 retirement housing on greenfield mid to high value zones and brownfield sites in high value zones. C2 Use Class will not be expected to deliver affordable housing;*
 - 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.*

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

2.14 The Local Plan Review sets out two monitoring indicators for Policy LPRSP10(B) on pages 362 and 363, which are set out within Figure 2.1 below:

Figure 2.1: Local Plan Review Monitoring Indicators

Indicator	Target	Trigger	Action
<p>M12</p> <p>Number and tenure of affordable homes delivered (including starter homes).</p>	<p>Number and tenure of affordable homes completed and consented per annum matches policy requirement.</p>	<p>Affordable housing delivery over phasing period (3-5 years) falls significantly below annual requirement.</p> <p>Tenure of affordable housing delivered over phasing period (3-5 years) deviates significantly from indicative policy target.</p>	<p>Work with Registered Providers to secure greater delivery or change to tenure of delivery.</p> <p>Promote council owned sites for affordable housing. Review interpretation of approach regarding off-site contributions.</p>
<p>M13</p> <p>Affordable housing as a proportion of overall housing delivery in geographical policy areas consented and completed relative to policy LPRSP10(B) requirements. The geographical areas are: Low Mid High Springfield</p>	<p>LPRSP10(B) percentage requirements achieved on all qualifying developments in geographical areas.</p>	<p>Proportion of affordable housing delivered in the respective geographical areas over phasing period (3-5 years) deviates significantly from indicative policy targets.</p>	<p>Review approach towards affordable housing provision, including with Registered Providers.</p>

Source: Local Plan Review

2.15 Policy LPRSP13 'Infrastructure Delivery' sets out on pages 181 to 182 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 order listed below, with affordable housing at the top of the list:

1. Affordable housing;
2. Transport;
3. Open space;
4. Education;

5. Health;
 6. Community facilities;
 7. Public realm;
 8. Waste management;
 9. Public services; and
 10. Libraries.
- 2.16 Policy LPRSA295 'Land at Copper Lane and Albion Road, Marden' concerns the appeal site, proposing an allocation for the development of approximately 113 dwellings on pages 259 to 260. The Policy does not include any site-specific requirements concerning affordable housing.
- 2.17 Policy LPRHPU6 concerns affordable housing need on rural exception sites, including first homes. This is not applicable to the proposed development which is not advanced as a rural exception site.

Marden Neighbourhood Plan 2017 to 2031 (made July 2020).

- 2.18 The Marden Neighbourhood Plan 2017 to 2031 ("the NDP") was drafted 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".

- 2.19 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'.
- 2.20 This Policy is not relevant to the proposal, save for acknowledging the extent of affordable housing need in Marden. The NDP refers to the Local Plan for the more general affordable housing policy.

Supplementary Planning Documents

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

- 2.21 The Affordable and Local Needs Housing SPD (“ALHN SPD”) was prepared in 2020 pursuant to the former Local Plan 2017, although paragraph 2.13 at page 14 of the adopted Local Plan Review confirms it has been ‘saved’ and remains in effect.
- 2.22 Paragraph 1.8 of page 3 of the ALHN SPD states that the ALHN SPD “...is intended to maximise the delivery of truly affordable homes in the borough”.
- 2.23 Page 5 of the ALHN SPD acknowledges at Paragraph 2.9 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”.*
- 2.24 In terms of the type of affordable housing, paragraph 5.5 of the ALHN SPD states on page 11:
- “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%”.*
- 2.25 In relation to Policy SP19 ‘Housing Mix’ of the Local Plan, paragraph 6.5 of the ALHN SPD advises on page 14 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.
- 2.26 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

	Social / Affordable Rented	Affordable Home Ownership	Market
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

- 2.27 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.
- 2.28 Page 16 of the SPD indicates at paragraph 7.4 that *“in 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”*.
- 2.29 Paragraph 8.3 of the SPD outlines at page 19 *“the 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”*.
- 2.30 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).
- 2.31 Further, the SPD acknowledges management issues with mixed tenure blocks of flats, and advises at paragraph 9.4, *“where 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”*.
- 2.32 Section 10 of the SPD outlines expected design standards for affordable homes, such as space and accessibility standards.

- 2.33 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.
- 2.34 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

- 2.35 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 (this remains in draft at the time of writing in June 2024);
 - 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

- 2.36 The Development Plan for the Council currently comprises the Maidstone Local Plan Review 2021 to 2038 (adopted March 2024) and the Marden Neighbourhood Plan 2017 to 2031 (made July 2020).
- 2.37 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.
- 2.38 The proposed development commits to meeting the principal Local Plan expectation for 40% of the total units to be affordable housing, as set out in Policy LPRSP10(B) of the Local Plan Review.
- 2.39 The delivery of up to 47 affordable homes at the appeal 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 4 of this statement.

Affordable Housing Needs in Maidstone Borough

Section 3

- 3.1 As set out in the supporting text of the Local Plan Review, 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 2021 Update (which is part of the evidence base for the Local Plan Review). This assessment seeks to identify the unconstrained (or “policy-off”) level of affordable housing need in Maidstone.

Maidstone Strategic Housing Market Assessment 2021 Update

- 3.2 The Maidstone Strategic Housing Market Assessment 2021 Update (the “SHMA 2021 Update”) was prepared by consultants Icení Projects and Justin Gardner Consulting, and forms part of the evidence base for the 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.
- 3.3 Section 5 sets out the assessment of affordable housing need for the eighteen-year period from 2019 to 2037. The assessment 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.
- 3.4 Table 5.15 at page 61 shows that the current or existing housing need has more than doubled since the publication of the last SHMA (2014); the newly arising need from new and existing households has fallen slightly and the supply of re-lets has fallen by almost one quarter.
- 3.5 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 sets out the net affordable home ownership need in Maidstone for the period, which equates to 137 affordable home ownership dwellings per annum.

- 3.6 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

- 3.7 There is a significant need for affordable housing in Maidstone, as identified in The SHMA 2021 Update. The report identifies a need for 559 affordable dwellings per annum between 2019 and 2037.
- 3.8 The significant increase between the most recent housing 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.
- 3.9 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 2021 SHMA Update period in 2019.
- 4.2 The past affordable housing delivery in Maidstone Boroughs against the 2014 SHMA is set out in the original Affordable Housing Statement, submitted with the outline application in August 2023.

Past Affordable Housing Delivery

- 4.3 Figure 4.1 below illustrates the net delivery of affordable housing in Maidstone, compared with overall housing delivery, in the four years since the start of the 2021 SHMA Update period in 2019. 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, 2019/20 to 2022/23

Monitoring Year	Net Overall Housing Completions	Net Affordable Housing Additions	Net Affordable Housing Additions as a %age of Net Overall Housing Completions
2019/20	1,424	344	24%
2020/21	1,446	402	28%
2021/22	1,627	380	23%
2022/23	1,064	277	26%
Total	5,561	1,403	25%
Average	1,390	351	25%

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

- 4.4 Between 2019/20 and 2022/23, a total of 5,561 dwellings were delivered in Maidstone Borough, equivalent to 1,390 dwellings per annum. Of these, 1,403 dwellings were affordable tenures, equivalent to 351 affordable dwellings per annum. This equates to 25% net affordable housing delivery which is below the 30% to 40% policy expectation in the Local Plan Review.

Affordable Housing Delivery Compared to Affordable Housing Needs

SHMA 2021 Update: 559 affordable dwellings per annum between 2019/20 and 2036/37

- 4.5 Figure 4.2 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 4.2: 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	Shortfall	Percentage of Needs Met
2019/20	344	559	-215	62%
2020/21	402	559	-157	72%
2021/22	380	559	-179	68%
2022/23	277	559	-282	50%
Total	1,403	2,236	-551	63%
Average	351	559	-138	63%

Source: See Figure 4.1 above; SHMA 2021 Update

- 4.6 Since the start of the SHMA 2021 Update period in 2019, affordable housing completions (net of Right to Buy) have averaged 351 net affordable dwellings per annum, against a significantly higher need of 559 net affordable dwellings per annum. A shortfall of -551 affordable dwellings has already arisen over the four-year period, equivalent to an average annual shortfall of -138 affordable dwellings. Overall, 63% of the identified need has been met.

Conclusions on Affordable Housing Delivery

- 4.7 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. 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.
- 4.8 That said, it is vital that affordable housing can come forward at allocated sites to maintain delivery and deal with existing affordable housing shortfalls.

- 4.9 **The scale of the identified need means that there remains an ongoing and sizeable unmet need for affordable homes in the Borough.** Against the need to deliver 559 affordable dwellings per annum between 2019/20 and 2036/37 identified in the SHMA 2021 Update, a shortfall of -551 affordable dwellings has already arisen in the last four years alone.
- 4.10 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 existing Local Plan allocations, which have recently been found sound at examination, and where the Council already accepts the principle of development.
- 4.11 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

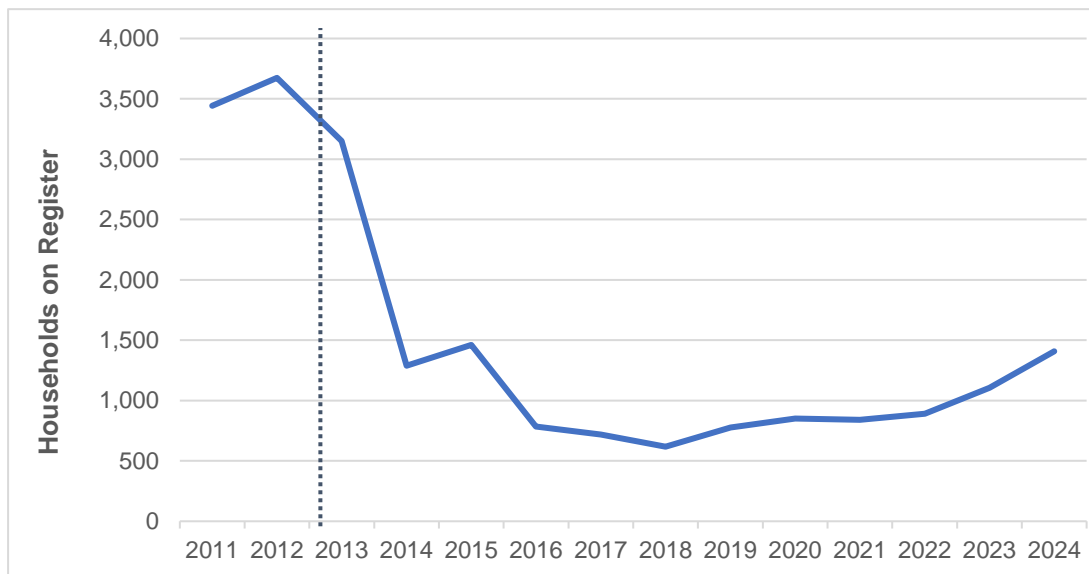
Section 5

- 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.
- 5.2 This Affordable Housing Statement will continue to use the former Maidstone Local Plan period of 2011/12 to 2030/31 for the below analysis, as this was the period used in the Affordable Housing Statement submitted with the original application.

Housing Register

- 5.3 The Council's Homechoice Team has confirmed that **on 9 May 2024, there were 1,408 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.
- 5.4 Figure 5.1 below illustrates the extent of the Housing Register since the start of the former 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 128% since 2018 (when the Register stood at 618 households).

Figure 5.1: Housing Register, 2011 to 2024



Source: Department for Levelling Up, Housing and Communities and Maidstone Borough Council (see **Appendix 2**)

- 5.5 Strikingly, the Housing Register has increased by 303 households (or 27%) in the last 13 months alone, between April 2023 when it stood at 1,105 households, and the most recent count in May 2024 of 1,408 households.

Local Preferences in Marden

- 5.6 The Council has confirmed that of the 1,408 live Housing Register applications, **194 households have selected Marden as one of their preferred areas**. This is equivalent to **14% 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

- 5.7 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.
- 5.8 Figure 5.2 below shows that over the 2023/24 monitoring period, the average wait to be housed in an affordable home in Maidstone Borough ranges from 10 months for a 2-bed apartment, to as long as 38 months for a 4+ bedroom house.

Figure 5.2: Waiting Times for Affordable Housing in Maidstone, March 2023 to March 2024

Type of affordable property	Average waiting time
1-bed affordable dwelling	12 months
2-bed affordable dwelling	10 months
3-bed affordable dwelling	31 months
4+ bed affordable dwelling	38 months

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

- 5.9 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

- 5.10 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 2023/24 monitoring period for a range of types of affordable property.

Figure 5.3: Bids Per Property in Marden, March 2023 to March 2024

Type of affordable property	Number of properties advertised	Average bids per property
1-bed affordable dwelling	12	24
2-bed affordable dwelling	8	10
3-bed affordable dwelling	1	26
4+ bed affordable dwelling	1	5

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

- 5.11 Figure 5.3 demonstrates that between 1 April 2023 to 31 March 2024 there were 22 affordable housing lettings. There were averages of 24 bids per 1-bed affordable dwelling put up for let in Marden, 10 bids per 2-bed affordable dwelling, and 26 bids per 3-bed affordable dwelling. Just one 3-bed affordable dwelling and one 4+ bed affordable dwelling was let at all over the period in Marden.

Temporary Accommodation

- 5.12 DLUHC statutory homelessness data highlights that on 31 March 2023, there were 265 households housed in temporary accommodation by the Council. This is a 62% increase from the 2022 figure of 162 households.
- 5.13 Of these 265 households, 42% were households with children. The council has a responsibility to house these households.

Homelessness

- 5.14 DLUHC statutory homelessness data shows that in the 12 months between 1 April 2022 and 31 March 2023, the Council accepted 596 households in need of homelessness prevention duty¹, and a further 427 households in need of relief duty² from the Council.
- 5.15 Furthermore a 2017 report by the National Audit Office (“NAO”) found that *“The ending of private sector tenancies has overtaken all other causes to become the biggest single driver of statutory homelessness in England.”*

Help to Buy Register

- 5.16 Further evidence in respect of the need for affordable housing across Maidstone Borough is provided in information from Help to Buy South.
- 5.17 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.
- 5.18 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.**

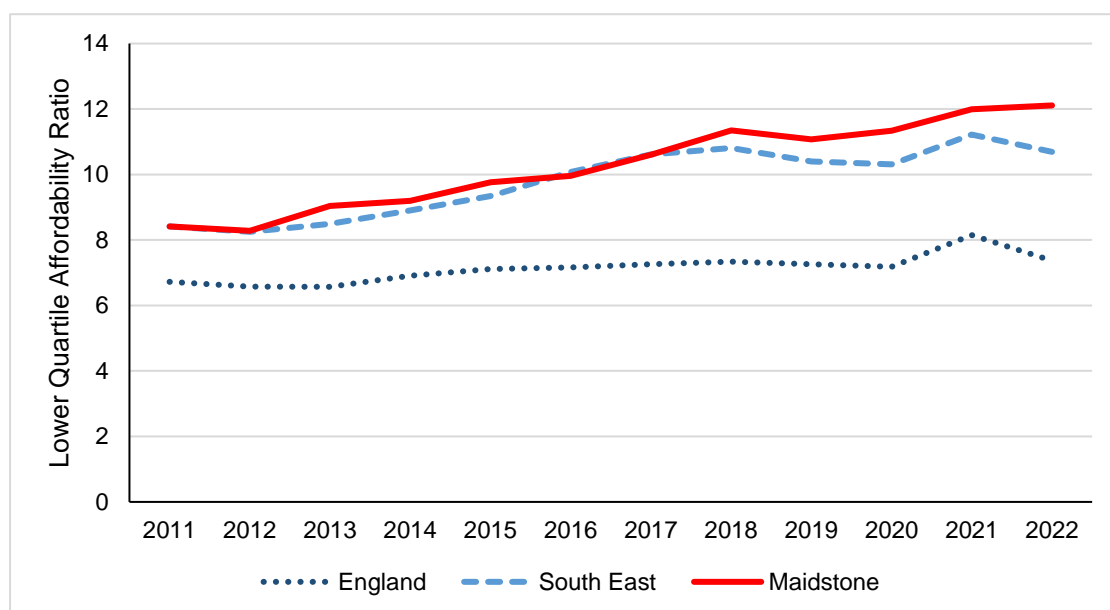
¹ The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

² The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

Affordability Ratios

- 5.19 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).
- 5.20 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



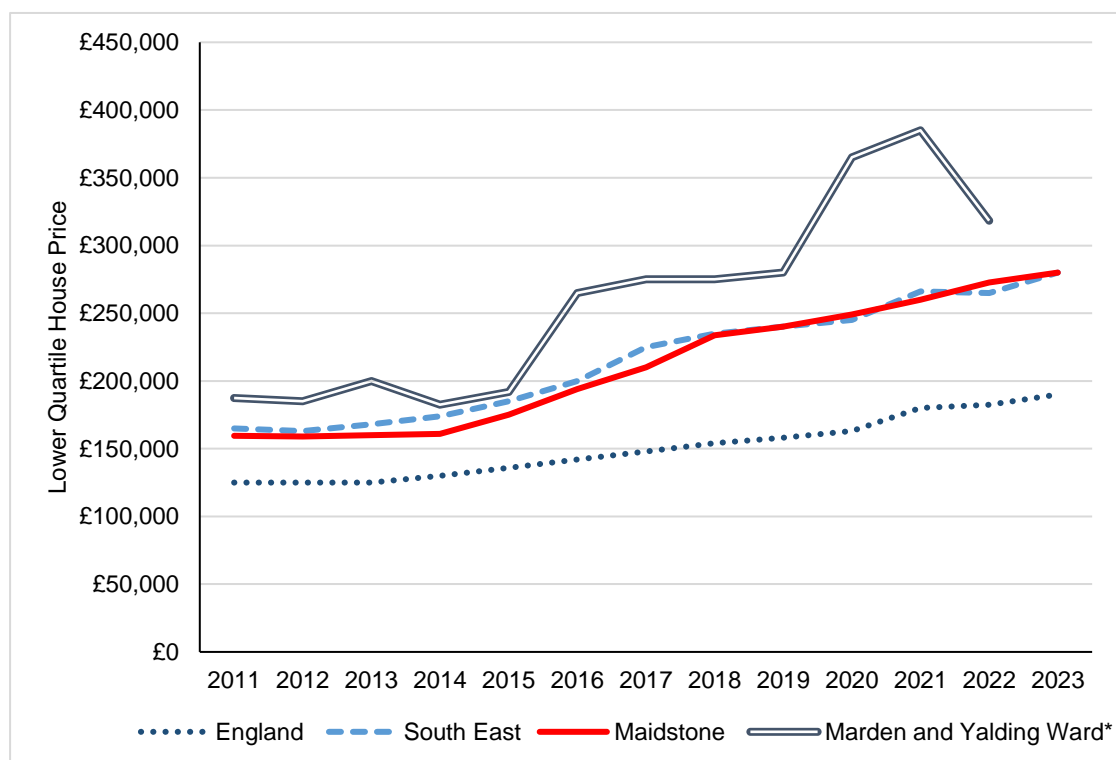
Source: Office for National Statistics

- 5.21 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

- 5.22 Figure 5.5 below illustrates lower quartile house sale prices in Maidstone Borough and in the Marden & Yalding council ward. In 2023, the lower quartile selling price in Maidstone was £280,000. This is £90,000 (or 47%) more than the England lower quartile selling price of £190,000.
- 5.23 In Marden & Yalding Ward in 2022, the lower quartile selling price was £318,360, which is £45,610 (or 17%) higher still than in Maidstone Borough in 2022. The lower quartile selling price here is also £53,360 (or 20%) higher than in the South East, and £135,860 (or 74%) more than in England as a whole.

Figure 5.5: Lower Quartile House Prices, Maidstone Borough and Marden & Yalding Ward, 2011 to 2023



Source: House Price Statistics for Small Areas

*Note: Lower Quartile House Price data is not available at council ward level for 2023

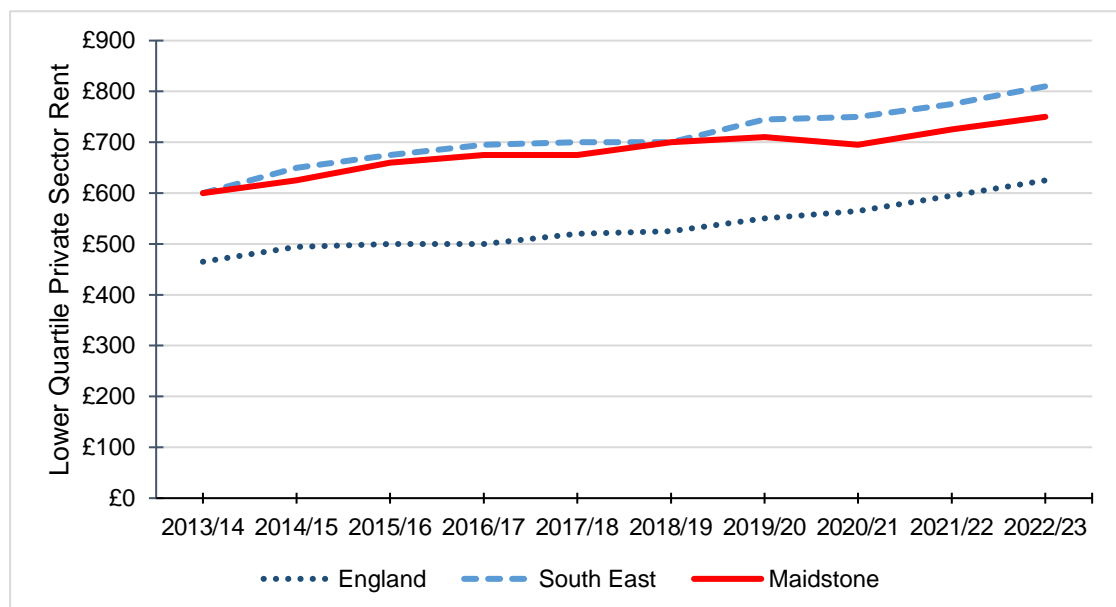
- 5.24 Since the base date of the former adopted Local Plan in 2011, the lower quartile house price in Maidstone Borough has increased by 75%; this is faster than in the South East (70% increase) and England as a whole (52% increase). In Marden & Yalding Ward, the lower quartile house price increased by 70% between 2011 and 2022, in line with the trend seen across Maidstone Borough as a whole.

Lower Quartile Private Sector Rents

- 5.25 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:

- £60 (or 7%) cheaper than the South East lower quartile rent of £810; but
- £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



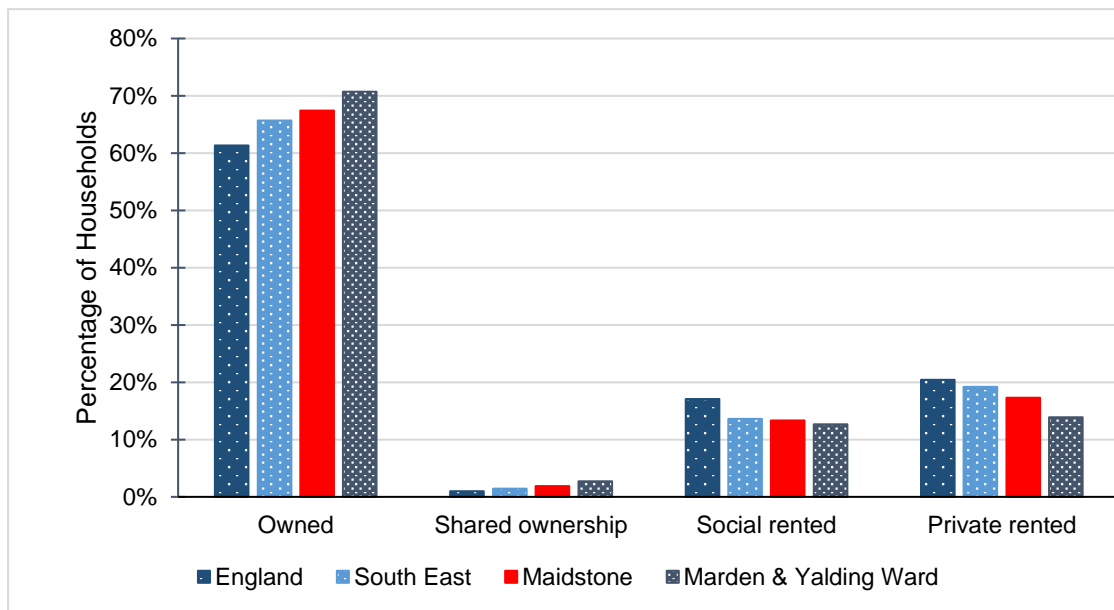
Source: Office for National Statistics and Valuation Office Agency

- 5.26 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

- 5.27 The 2021 Census 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.

- 5.28 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.
- 5.29 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

- 5.30 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 an expensive part of the Borough.
- 5.31 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

Section 6

- 6.1 To recap, the Appellant, B.Yond Homes (formerly Rydon Homes), seeks outline planning permission (with all matters reserved except access) for 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 the Local Plan Review policy LPRSP10(B). The site benefits from an 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.
- 6.4 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 only 63% of the identified need has been met.
- 6.5 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 previous 2014 SHMA.

- 6.6 The Council is making progress towards meeting its affordable housing needs. 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

- 6.7 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 1,408 households on 9 May 2024, 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, 194 households have expressed a locational preference for Marden (i.e. 14% of the Register);
 - c. Lengthy waiting times for affordable housing of up to 31 months for a three-bed affordable home and 38 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 which is higher than the national and South East ratios, and far out-of-reach for households without access to substantial savings or inherited wealth;
 - f. Lower quartile house prices in Maidstone Borough of £280,000 and £318,360 in Marden & Yalding ward, both in excess of the national lower quartile house price;
 - 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.
- 6.8 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

- 6.9 As the Local Plan Review demonstrates, 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 has progressed a new Local Plan which offers a plan-led route towards meeting the Borough's pressing housing needs.
- 6.10 The proposed development offers the opportunity to deliver up to 47 affordable homes to help meet identified needs. This site *alone* could contribute the equivalent of 8% of the annual need for 559 affordable dwellings set out in the SHMA 2021 Update.
- 6.11 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.
- 6.12 In determining the original application, the Council had the opportunity to take positive action to address the housing challenge in Maidstone, through the grant of planning permission for more affordable homes. Regrettably, the Council did not do this.
- 6.13 The proposed development comes forward on an identified allocation site (and found sound by the examining Inspector); 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.

Conclusions on the weight to be attributed to the proposed affordable housing

- 6.14 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.
- 6.15 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.
- 6.16 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.

6.17 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.

6.18 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**. Allowing this appeal without delay will facilitate the prompt delivery of these much-needed new homes.