

Little Acres, Longfield Avenue, Gravesend, Longfield, Kent, DA3 7LA

LPA Ref: 20211478

Demolition of all buildings and the erection of 16 static homes restricted to those aged 55 and above, with associated management office.

AFFORDABLE HOUSING STATEMENT

This Statement includes an assessment of relevant Development Plan policies, other material considerations and other guidance relevant to the site and the proposed development; and provides justification for the grant of permission. In doing so it defines the housing needs that will be met by the applicant, together with details of the affordable housing offer.

It should be read alongside the scheme drawings and a number of other accompanying reports prepared by specialist consultants.

The applicants have an aspiration to maximise affordable housing delivery within the development. To this end, it is proposed to provide affordable housing through the development in line with the requirements set out in Core Strategy Policy CS16 seeking 30% provision.

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.

The Development Plan for the area comprises the Gravesham Local Plan Core Strategy (adopted September 2014 and saved policies from the Gravesham Local Plan First Review (adopted November 1994).

Other material considerations include the revised National Planning Policy Framework (NPPF), Planning Practice Guidance (PPG) and the emerging Local Plan.

Gravesham Local Plan Core Strategy (adopted September 2014)

The Core Strategy was adopted in 2014 and covers the period to 2028, detailing how development will be guided across that period in light of the needs identified in the evidence base which supported the adoption of the Plan.

Paragraph 2.5.1 outlines the findings of the 2012 Strategic Housing Market Assessment indicating “a particular need for two and three bedroom market housing and one, two and three bedroom affordable housing.”

Paragraph 5.10.3 confirms that for affordable housing as set out within the SHMA update “the greatest need is for one bedroom properties (37%) but it also shows significant needs for two bedroom (32%) and three bedroom (28%) properties.”

Affordable housing is defined within the Core Strategy at paragraph 5.12.1 as “housing with sale prices or rent levels which are set substantially lower than the prevailing market price or rent, so that it will be accessible to local people in priority housing

need, whose incomes are insufficient to enable them to afford housing on the open market.” The definition relating to types obviously pre-dates the revised NPPF 2019 and therefore does not recognise starter homes or shared ownership as examples.

Policy CS16 requires 30% affordable housing to be provided on all sites of 15 dwellings or above within the urban area.

The supporting text to the policy at 5.12.3 indicates a tenure split of 70% affordable and social rented provided by a Registered Social Landlord and 30% intermediate housing.

Paragraph 5.12.4 confirms that the provision should be made on-site unless it can be robustly justified why this is not deliverable, in which case an alternative site or commuted sum will be sought.

Gravesham Local Plan First Review (adopted November 1994)

The saved policies from the Local Plan First Review remain relevant until such times as replaced by the Site Allocations and Development Management Plan, or where they conflict with the NPPF. There are no relevant policies within the plan that relate to the delivery of affordable housing however.

Affordable Housing as a Strategic Priority

There is a well-defined need for housing, and in particular affordable housing in Gravesham. Provision is identified as a priority in the Gravesham Local Plan Core Strategy 2014 as well as the 2012 SHMA update.

Gravesham SHMA Update 2012

The 2012 SHMA update identified the provision of 4,600 dwellings over the plan period of 2011 to 2028 based on a zero net migration approach.

The KCC strategy-based housing projections identified the requirement for 8,900 dwellings between 2008 to 2026, of which 3,200 were required as social rent and 5,700 for other tenures. This reflects the fact that 36% of the overall housing requirement in Gravesham at the time was for social rented due to historically high levels of right to buy sales primarily. Of the remaining 64% (5,700 dwellings), a further 7% (600 dwellings) were required for intermediate affordable housing. In total therefore, the KCC figures indicated that 43% of new dwellings would be required within the affordable housing sector.

With respect to tenure mix, the SHMA indicated a borough-wide mix target of 30% intermediate: 70% rent would be appropriate.

The April 2012 population projections used within the updated indicated “a greater need for intermediate affordable homes as a proportion of supply and a reduction in the need for open market properties. The North Kent SHMA identified a need for the Borough’s housing supply to consist of 43% affordable housing.” (paragraph 10.2)

However, when the population projections relating to the need for 4,600 dwellings over the plan period were applied to the ORS North Kent SHMA model the affordable housing need was identified as reaching 52% of provision.

When this was reflected in dwelling size the data showed a reduction in need for the larger 3-5 bedroom properties with a proportional increase in the need for 1-2 bedroom properties.

Policy Requirements

Core Strategy Policy CS16 requires the provision of 30% affordable housing on qualifying sites within the urban area. It is anticipated that, subject to the completion of a satisfactory Section 106 agreement, and resolution of any other unforeseen matters relating to the delivery and phasing of the development, this proposal will result in a scheme in accordance with the requirement for 30% affordable housing provision identified in Core Strategy Policy CS16.

There is a wide evidence base identifying the needs for affordable housing in the Borough. The Gravesham Local Plan Core Strategy 2014 as well as the 2012 SHMA update, identify symptoms of the local housing market being dysfunctional and highlight the critical importance of delivering affordable housing in the Borough.

Provision of Affordable Housing within the Development

The development in question provides for 16 units of accommodation, in the form of age controlled static homes.

Six of these 16 units will be provided as Affordable Housing.

We are aware that RSLs within Gravesham are unlikely to have much interest in such a limited number of units.

In accordance with the terms therefore of policy CS16 it is proposed that a commuted sum is provided to secure delivery of either additional affordable dwellings on another site or the upgrading of existing council housing stock. It is acceptable in principle for the use of a cascade mechanism within the section 106 agreement to consider delivery on site if a suitable provider can be identified, but allowing the provision of a commuted sum subsequently if no such provider can be identified.

Conclusions

The Courts have confirmed that affordable housing is capable of being a compelling material consideration in the determination of planning applications.

The application site is sustainable and suitable for the provision of affordable housing, being well located to meet demonstrable affordable housing needs and accessible to services, facilities and employment opportunities.

The 30% proportion of affordable housing in accordance with the application of the vacant building credit approach meets the requirements of Core Strategy Policy CS16

sought by the Council. It has been demonstrated that the Secretary of State has elsewhere attached substantial weight to affordable housing schemes including schemes offering relatively low proportions of affordable housing.

The affordable housing provision will be secured via the Section 106 Undertaking.

Gravesham Borough Council