

# Housing Affordability

Supplementary Planning Document  
(SPD)

September 2023



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## **Foreword**

*To be added*

Cllr Paul Fuller, Cabinet Member for Planning, Coastal Protection and Flooding

Cllr Ian Stephens, Deputy Leader and Cabinet Member for Adult Services and Housing, Public Health and Homelessness

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## 1. Introduction and the current housing context on the Island

- 1.1 The Island Planning Strategy (IPS) is currently being prepared and once adopted will replace the Island Plan Core Strategy 2012. Preparing and adopting a local plan takes time and the IPS still has a number of formal stages to go through, including an examination in public, prior to being adopted.
- 1.2 The local planning authority's (LPA) affordable housing policy is currently provided by Core Strategy Policy DM4 `Local Affordable Housing`. National guidance has been amended since the adoption of the Core Strategy and updated evidence has been collected. It is considered that a new Supplementary Planning Document (SPD) will give guidance on how the LPA will implement Policy DM4 in the current context.
- 1.3 This SPD will provide guidance on the types of affordable housing and the target mix being sought on sites. The SPD specifically supports the implementation of **Core Strategy Policy DM4 criteria 3 and 4**. This SPD will work alongside the existing Affordable Housing Contributions SPD that came into force in 2017 and sets out when we ask developers to provide financial contributions towards affordable housing and how much those contributions will be.
- 1.4 Specific areas covered in this document include: -
  - An explanation of the affordable housing process from gaining planning permission through to the occupation of dwellings;
  - Clarification on the sources of data that will be used to inform local affordable housing requirements (size, tenure, level of market discount);
  - An updated commentary on the Policy DM4 target mix of 70% social/affordable rented and 30% intermediate tenures;
  - The types of affordable housing the council will require developers to provide when delivering on-site affordable properties;
  - The discount from the market value the Council will seek on First Homes;

- 1.5 This document will be adopted as a Supplementary Planning Document (SPD) and will be capable of being a material consideration in the determination of planning applications.

### **The current housing context**

The housing situation has fundamentally changed on the Island over the last couple of years which has resulted in a very challenging market for many island residents wanting to rent or purchase a home.

One key change has been the severe reduction in the number of homes available to rent on the Island - from an average of 350 homes per month being available up until December 2019, this rapidly reduced by around 85% to around 60 homes per month by October 2021 and has continued to fall.

It is estimated that at least a third of the island private rental market, or around 5,000 properties, have been sold privately over the past couple of years and this trend is continuing. Rising interest rates and no significant fall in house prices are also affecting both the rental and sales markets.

Whilst many of the market factors affecting the housing market are outside of the control of the Council, the IWC is committed to do whatever it can to try and tackle some of the issues apparent on the island.

- 1.6 The Island has a high level of home ownership with 70% of homes owned compared to 63% in England. By comparison, the proportion of social rented properties is much lower on the island at 11%, compared to 14% in Hampshire and 18% in England. Privately rented properties form around 17% of total properties, the same level as in England but higher than the 13% in Hampshire (IOW Affordable Housing Assessment 2022). These proportions have stayed relatively static over the past 15 years.
- 1.7 Using the household income profile for the Isle of Wight (as shown in Table 1), it is estimated that 96% of households are unable to afford median property prices, and 85% are unable to afford the entry-level,



lower quartile costs. 46% of new households are unable to afford the lower quartile rent of £550pcm.

**Table 1: House prices and affordability**

	Lower Quartile	Median
Open market property price	<b>£188,000</b>	<b>£255,000</b>
Income needed (15% deposit and 4x loan to income multiplier)	<b>£39,950</b>	<b>£54,188</b>
Proportion of island households unable to afford	<b>85%</b>	<b>96%</b>

Source: Table 81 HNA, 2022

- 1.8 On the Island, the average cost of a new build dwelling is £373,663, an increase of 96.9% since 2010 (HM Land Registry Open Data, January 2022). Property prices, although cheaper than many areas of the South East, remain unaffordable for many local households. Many Island residents find they are unable to purchase a first home, particularly working age islanders. Median annual household income on the island in 2021 was £27,500 (Local Housing Needs Assessment, May 2022).
- 1.9 In 2021, the affordability ratio of average house prices to average earnings on the Island was 10.00, based on an average of all house prices<sup>1</sup> of £255,000 (Local Housing Needs Assessment 2022). This compares to affordability ratios in Portsmouth and Southampton of 7.44 and 7.43 respectively (Local Government Association, 2021). Note: affordability ratios vary from year to year and declined on both the island and the two cities in 2022.
- 1.10 A contributory factor to affordability on the island is considered to be second homes and holiday homes. This contributes to inflated prices and further limits housing availability.
- 1.11 The HNA, 2022 identifies that 372 homes per year are needed to meet affordable housing need for rent on the island and 117 dwellings per year for affordable home ownership. based on an overall housing need of 667 dwellings per annum (the standard methodology number at the time the HNA was undertaken).

<sup>1</sup> This figure is an average of all types of housing including new build and so is lower than the average cost of new build dwellings, which have a premium, used in paragraph 4.2.

## Affordable Housing Delivery on the Island

- 1.12 Since 2015/16 there has been limited delivery of affordable housing on the island. In the last 7 years, 330 affordable homes have been completed on the island, only 13% of total completions, The table below shows the annual provision over the last 7 years on the island.

**Table 2 Affordable Housing Completions 2015-2022**

Year	Total new homes completed	Affordable homes completed	% of completions as AH
2021/22	490	114	23%
2020/21	445	123	28%
2019/20	253	6	2.4%
2018/19	350	0	0%
2017/18	360	18	5%
2016/17	321	34	10.6%
2015/16	417	35	8.4%
<b>Total</b>	<b>2,636</b>	<b>330</b>	<b>13%</b>

Source: IOW Authority Monitoring Reports

- 1.13 However the last two Authority Monitoring Reports for 2020/21 & 2021/22 identified that 123 and 114 affordable housing units (or 28% & 23%) respectively of total completions were delivered, a large increase on the previous 5 years. This is more consistent with levels achieved between 2011 and 2015 when 140 dwellings per annum were achieved on average. This however is well short of the identified need of 372 affordable dwellings per annum.
- 1.14 A lack of affordable housing provision and a high demand means just over 2,300 individual households have been identified as being within the most urgent housing need bands for rented properties. The table below sets out how this translates into different dwelling sizes.

**Table 3 Housing Need by Property Size**

Bedroom Need	1 bed	2 beds	3 beds	4+ bed	Total
Band 1	2	2	0	1	5
Band 2	177	40	33	37	287
Band 3	671	356	218	58	1,303
Band 4	258	270	143	35	706
<b>Total</b>	<b>1,108</b>	<b>668</b>	<b>394</b>	<b>131</b>	<b>2,301</b>

*Table 2: Island Homefinder Band A to Band D statistics, May 2023*

1.15 The [Affordable Housing Assessment 2019](#) identifies that no size of property would be considered to be 'affordable' at 80% of market value. Island Affordable Rent levels are identified as:

- 1-bed: 70% market rent or Local Housing Allowance (LHA), whichever is the lowest
- 2-bed: 70% market rent or LHA, whichever is the lowest
- 3-bed: Up to 65% for working families or capped at 50% for low income
- 4-bed: 50% market rent (capped rent)

1.16 The HNA identifies a requirement for different tenure types across the Island. There is a range of information available to use as a starting point to help determine an appropriate combination of general market housing and affordable housing types in any planning application to ensure it contributes to meeting identified needs. These are set out in [SPD guidance point AH1](#) in Section 4 below.

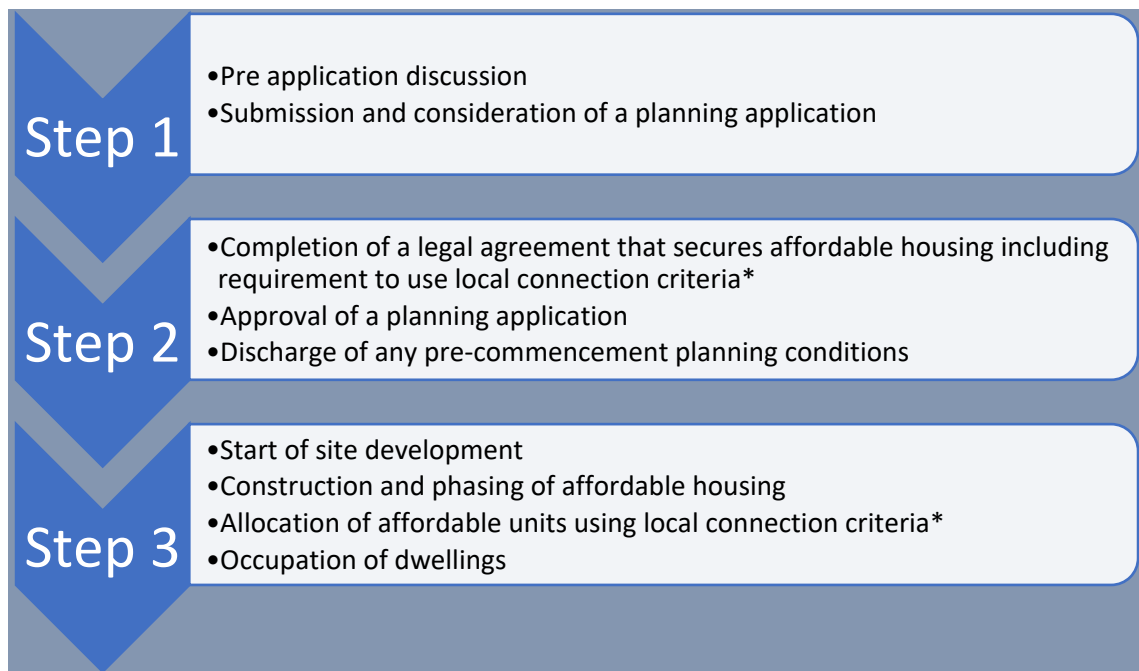
## **2. Why an SPD is required**

- 2.1 In light of the challenges around delivering affordable homes on the Island and the importance of meeting the Island's affordable housing needs, the Council wishes to provide clarity on how it will apply its current planning policy on affordable homes.
- 2.2 It is intended that this guidance, in advance of a new local plan being adopted, will help to ensure that all that is possible is being done through the planning process to deliver an appropriate mix of affordable homes.

### 3. The Process of Affordable Housing Provision

3.1 Affordable housing is in short supply and applicants, depending on their circumstances, generally face a wait to secure a property. The main steps that need to be completed before a property is occupied are set out in Figure 1 below.

**Figure 1 Process of Affordable Housing Provision**



\* See Appendix 4 for an example of the local connection criteria used to allocate affordable homes on the island

- 3.2 Once a planning application is registered, it is then assessed by a planning officer and a report is written setting out its acceptability and compliance with local plan policies including Policy DM4 `Locally Affordable Housing`.
- 3.3 After consideration of the report, if the planning application is to be approved, a legal agreement may be required. The legal agreement ensures that provisions like affordable housing and their timing are committed and agreed before permission is granted and a development commences.
- 3.4 Once the affordable housing units are developed, they are advertised for occupants on the Island Homefinder scheme. The Island Homefinder scheme is operated by IOWC, Vectis Housing Association, Sovereign Housing Association and Southern Housing. This Scheme offers the available properties and applicants can apply for the property of their

choice providing they meet the stated eligibility criteria. Available properties are advertised on the website by each partner to the scheme. An applicant can apply for as many properties as they wish. The relevant Housing Association shortlists applicants in order of Island Homefinder band, and properties are allocated in order of the shortlist to those applicants that meet the local connection criteria (see Appendix 4) that is set out in the legal agreement forming part of the planning permission.

- 3.5 It should be noted that some types of affordable housing, for example Shared Ownership homes funded with grant from Homes England, cannot be subject to any occupancy restrictions.
- 3.6 The Council also acknowledge that there are other routes to deliver additional affordable housing over and above that secured as 'policy compliant' through Section 106 agreements. This can be delivered by Registered Providers using grant. Where necessary, flexibility will be applied within a Section 106 agreement to maximise the ability to deliver additional and 100% affordable schemes.

## **4. Guidance on how the LPA will apply its Affordable Housing Policies**

- 4.1 The LPA will use the guidance set out in this SPD when it is relevant to determining planning applications. The following guidance should be considered before permission is sought.

### **SPD Guidance AH1**

- 4.2 The LPA expects that the most up to date and relevant information will be used by applicants when considering an appropriate mix of affordable properties on qualifying sites (as defined in Policy DM4 – see Appendix 2).

**SPD Guidance AH1: How can an applicant demonstrate how their proposal contributes to meeting local housing needs and therefore benefits the local community?**

Applicants will be encouraged to engage with the Council at pre-application stage to receive a clear steer on the expected make-up of any on-site affordable homes.

The Council will use the following sources of data, when available, to inform its view on what the appropriate mix of on-site affordable housing should be:

- a) the Island Homefinder register (IWC);
- b) Adopted neighbourhood plans;
- c) Parish level housing needs surveys completed after 2018;
- d) IOW Housing Needs Assessment (HNA) 2018 & Local Housing Needs Assessment 2022;
- e) Affordable Housing Assessment 2019 (IWC).

Submissions that do not provide the expected make-up of on-site affordable homes at pre-application / application stage should submit an evidenced justification as to why this cannot be achieved. Such justification will be scrutinised more closely by the LPA during the determination process and should clearly set out the site-specific constraints and reasons why an alternative make-up is being proposed.

**SPD Guidance AH1 supporting information**

- 4.3 The Local Housing Needs Assessments of 2018 & 2022 identify the need for a range of tenure types within the different areas across the Island. A number of documents can help to inform on the most appropriate mix to meet housing needs on the island. These include the Island Homefinder register; adopted neighbourhood plans; Parish level housing needs surveys completed after 2018; Housing Needs Assessment (HNA) 2018 and the HNA update 2022 (GL Hearn) and the Affordable Housing Assessment 2019 (IWC).
- 4.4 The information in these sources should be combined and will be used as the starting point in determining an appropriate mix of general market housing and affordable housing types to contribute to meeting identified needs. Applicants can also engage with Registered Providers prior to and during the planning application process to help guide the mix and specification of homes.
- 4.5 Adopted [Neighbourhood Plans](#) as of August 2023 are:
- Bembridge NP, 2014
  - Brading NP, 2015
  - Brighstone NP, 2016
  - Gurnard NP, 2017
  - Freshwater NP, 2018
- 4.6 Town, Parish, and Community councils, with or without neighbourhood plans, are encouraged to undertake local housing needs surveys in order to help inform the housing mixes being sought at the local level. This would be particularly beneficial where there is no local data or where existing information is out of date. With agreement of all parties, the carrying out of local housing needs surveys could be funded by developers. Regular updates to any completed surveys would ensure that the data remains as relevant as possible.



## SPD Guidance AH2

- 4.7 Affordable housing needs vary across the island and between different settlements. However, it is clear that the majority of affordable need is for social or affordable rent, and this is reflected in **SPD guidance point AH2**. The other types of affordable housing vary, and new products are emerging. Each of these address different housing needs. The make-up of this mix in different settlements on the island should be informed by a site by site appraisal, taking in the latest available information. Consideration should include addressing the housing needs of older people.

### SPD Guidance AH2 On-Site Affordable Housing Requirements

To help the Council tackle the increased need for affordable homes on the Island and address the specific challenges it currently faces, particularly in relation to the provision of social or affordable rent, it will need to consider whether the target mix of affordable housing types set out in Policy DM4 remain the most appropriate.

The evidence that the Council has collected to inform the Island Planning Strategy indicates that of the 35% affordable housing on qualifying sites, a target split of 80/20, rather than the 70/30 target split set out in the adopted Island Plan Core Strategy would better meet the current needs of the island housing market.

Therefore, the LPA may consider that the following target mix could be more appropriate:

- a) 80% social or affordable rent, and
- b) 20% to be other affordable housing products

### SPD Guidance AH2 supporting information

- 4.8 Proposals for the affordable housing element of a development site are expected to take account of the information set out in the data sources in **SPD guidance point AH1**. Achieving the right balance in affordable housing provision will vary across the island and from site to site depending on its characteristics. Pre application discussions with the

council are strongly advised in order to discuss the suitability of any proposals in a given location. Proposals should ideally be informed by a site appraisal based on a local housing needs survey and agreed with the council. Development will be expected to deliver 35% affordable housing on-site in line with Core Strategy policy DM4 and national policy. However, proposals that can deliver more than the 35 per cent requirement will be welcomed.

- 4.9 The level of need for social and affordable rented properties has changed significantly since the Island Plan Core Strategy was adopted in 2012, with a substantial increase evidenced in the Local Housing Needs Assessment 2022. In light of this, the LPA will consider being adaptable to the target mix the LPA wishes to achieve across the island over the plan period to reflect the current position, increasing the amount sought to 80% of affordable housing. Other affordable products have consequently been reduced to 20%.
- 4.10 Where part of a dwelling results from the affordable housing calculation, the figure will be rounded to the nearest unit i.e., if it is 0.5 units or more it will be rounded up to the nearest unit. Where it is below 0.5 units it will be rounded down to the nearest unit.

For example, on a site of **120 homes** the following would be the target mix using the criteria set out in Guidance point AH2:

- i. **78** market sale homes, **42** affordable homes (35% in line with Policy DM4)
  - ii. Of the **42** affordable homes:
    - a. **34** x social/affordable rent;
    - b. **8** x other affordable housing products, which could include First Homes, discounted market sales or other intermediate tenures such as shared ownership.
- 4.11 The council recognise 'Rentplus' as an affordable housing product and that this can contribute to the mix of affordable housing products across the island. Tenants pay a discounted rent (80% of open market rent) for a minimum of 5 years to save towards the purchase of the house. The option to purchase comes after 5, 10, 15 or 20 years which is agreed at the start of the process and a 10% deposit is gifted when tenants are ready to purchase.

- 4.12 It is not expected that all onsite affordable housing will be provided through the Rentplus model, or other Rent to Buy models that may be available. Whilst the council is keen to facilitate new affordable housing products on the island, it is conscious of the need to maintain a varied supply and mix of affordable housing and home ownership.
- 4.13 First Homes<sup>2</sup> are designed to allow people to get on the housing ladder in their local area. It is considered that First Homes could contribute to providing a solution for local islanders buying their first home and/or for key workers. The role these play in providing for affordable housing on the island will vary and housing providers are encouraged to discuss this provision in pre-application discussions.
- 4.14 In line with government guidance, the Council will expect that any First Homes included as part of the mix will be discounted by a minimum of 30% against market value.

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<sup>2</sup> See Appendix 1

## 5. Monitoring and review

- 5.1 This SPD will provide guidance to the LPA and applicants and will operate until Core Strategy policy DM4 is replaced by policy in the new Island Planning Strategy, or it is updated to reflect new government planning guidance or policy. New supplementary guidance will be produced to supplement new planning policies if it is required and permitted by new government guidance in place at the time.
- 5.2 The mix of market and affordable housing will be monitored each year in the Authority Monitoring Report as well as the affordable housing mix. A commentary against guidance points AH1 and AH2 will be provided.

## **Appendix 1: Current national planning practice guidance and policy on affordable homes (including First Homes)**

Planning Practice Guidance (paragraph 006 ref ID: 67-006-20190722) describes affordable housing need as an estimate of *“the current number of households and projected households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market”*.

The NPPF paragraphs 62 and 63 set out that: *‘The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing...)’*.

*‘Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required...’ applying the definition in Annex 2 to the framework’*.

The definition of affordable housing in the NPPF Annex 2 is:

*‘Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:*

**a) Affordable housing for rent:** *meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).*

**b) Starter homes:** *is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household’s eligibility to*

*purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.*

**c) Discounted market sales housing** *is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.*

**d) Other affordable routes to home ownership** *- housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.'*

## **First Homes**

In May 2021, the Government published guidance on 'First Homes' a specific kind of discounted market sale housing which meets the definition of 'affordable housing' for planning purposes in a Written Ministerial Statement.

First Homes must:

- i. be discounted by a minimum of 30% against the market value; and,
- ii. after the discount has been applied, the first sale of the home must be at a price no higher than £250,000; and
- iii. be sold to a person who meets the First Homes eligibility criteria as set out below:
  - o A purchaser (or, if a joint purchase, all the purchasers) of a First Home should be a first-time buyer as defined in paragraph 6 of schedule 6ZA of the Finance Act 2003 for the purposes of Stamp Duty Relief for first-time buyers.
  - o Purchasers of First Homes, whether individuals, couples or group purchasers, should have a combined annual household income not exceeding £80,000 (or £90,000 in Greater London) in the tax year immediately preceding the year of purchase.

A purchaser of a First Home should have a mortgage or home purchase plan to fund a minimum of 50% of the discounted purchase price.

First Homes are not a requirement or mandatory and so might be suitable on a scheme on the island but equally might not be. It is expected that any First Homes (remaining in perpetuity) will be secured through section 106 planning agreements.

**Appendix 2: Current local planning policy on affordable homes**

Core Strategy Policy DM4 is set out below:

**DM4 Locally Affordable Housing**

The Council will seek to deliver around 1,790 affordable homes over the plan period. Development proposals will be expected to:

1. Provide 35% of the development as on-site affordable housing, based on developments of 15+ units in Key Regeneration Areas and 10+ units elsewhere.
2. Provide financial contributions towards affordable housing for developments of 1-14 units in Key Regeneration Areas and 1-9 units in Smaller Regeneration Areas and rural areas.
3. Deliver a target mix of 70% of affordable housing to be social/affordable rented and 30% for intermediate tenures.
4. Demonstrate how the proposals benefit the community.

The Council will support proposals for rural exception sites that would deliver affordable housing outside of identified settlement boundaries, where a local need can be demonstrated and there is no reasonable prospect of other sites meeting the identified local need. To take account of changing economic circumstances, if a developer is unable to provide the required 35% affordable housing, the Council will require an open-book assessment of the development viability to demonstrate what level of affordable housing is viable for the site. The contribution towards affordable housing will be set out in the Planning Obligations SPD

Policy DM4 provides guidance on the provision of affordable housing in the planning application process. The policy is supplemented by an Affordable Housing Contributions SPD which came into force in March 2017. This sets out the parameters for collecting a 3% financial contribution from qualifying development for the provision of affordable housing, expanding on criterion 2 of policy DM4.

This new SPD `Housing Affordability` supplements criteria 3 and 4 of policy DM4 which seeks a) target mix of 70% of affordable housing to be social/affordable rented and 30% a mix of intermediate tenures and b) information on how the proposals benefit the community. This additional guidance will allow new development coming forward in advance of the adoption of the new Island Planning Strategy to best meet the island's housing needs and reflect changing circumstances in the housing market.



**Appendix 3: Future local planning policy on affordable homes**

A new Island Planning Strategy (IPS) is being prepared. Its next stage will be Regulation 19 consultation as the Plan enters its formal stages of preparation. Following a period for representations, a public examination will be held.

New affordable housing policy in the IPS will take account of the latest evidence in the Affordable Housing Needs Assessment 2022 and updated information on affordability and viability.

New policy will seek to achieve a good mix of housing types to maximise meeting as many needs of the island population as possible, as well as requiring 'island affordable' properties that are at a deeper discount from market value. This Housing Affordability SPD cannot introduce those deeper discounts as it cannot write 'new policy' that does not conform with adopted local and national policy.

**Appendix 4: Example Local Connection criteria**

Local connection means, in the following order of priority: -

- (a) A person living in the Parish of xx who has an appropriate housing need because such person's family size has increased.
- (b) A person living in the Parish of xx who wishes to transfer to a smaller property to release large accommodation to the housing market or rented housing sector.
- (c) A person living in the Parish of xx who wishes to transfer to a similar sized property.
- (d) A person who has previously lived in the Parish of xx for 5 or more years up to the age of 16.
- (e) A person who has for a minimum of 3 years prior to the purchase or occupation of any dwelling been in full or part-time employment (excluding seasonal employment) in the Parish of xx.
- (f) A person who has for up to 3 years prior to the purchase or occupation of any dwelling been in full or part-time employment (excluding seasonal employment) in the Parish of xx or has accepted an unconditional offer of full or part time employment (excluding seasonal employment) in the Parish of xx;
- (g) A person living in an adjoining ward who is subject to a planned management transfer based on medical welfare grounds.
- (h) A person living on the Isle of Wight who has an appropriate housing need because such person's family size has increased.
- (i) A person living on the Isle of Wight and who wishes to transfer to a smaller property to release large accommodation to the housing market or rented housing sector.
- (j) A person living on the Isle of Wight who wishes to transfer to a similar sized property.
- (k) A person who has lived on the Isle of Wight for 5 or more years up to the age of 16.
- (l) A person who has for a minimum of 3 years prior to the purchase or occupation of any dwelling been in full or part-time employment (excluding seasonal employment) on the Isle of Wight.
- (m) A person who has for up to 3 years prior to the purchase or occupation of any dwelling been in full or part-time employment (excluding seasonal employment) on the Isle of Wight or has accepted an unconditional offer of full or part time employment (excluding seasonal employment) on the Isle of Wight.

- (n) A person living on the Isle of Wight who is registered on Island Home Finder.
- (o) A person living on the Isle of Wight or any person the Council and the Affordable Housing Provider approve.