

Dartford and Ebbsfleet Housing Needs Assessment

October 2019



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HDH Planning & Development Ltd

Clapham Woods Farm Keasden, Nr. Clapham Lancaster. LA2 8ET info@hdhplanning.co.uk 015242 51831 / 07989 975 977 Registered in England Company Number 08555548

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1. Introduction

Purpose

- 1.1 Dartford is a Borough adjacent to London in Kent, immediately to the south of the River Thames with excellent transport links to London and the south and east of England. It has long been identified as part of the Thames Estuary growth area and has recently experienced a high-level of housing growth.
- 1.2 The Borough contains part of the Ebbsfleet Development Corporation (EDC). The EDC was set up by the Government in 2015 to deliver up to 15,000 homes and oversee the creation of a 21st Century Garden City in north Kent. The EDC covers land in both Dartford and neighbouring Gravesham. As the Council notes 'Whilst the EDC is responsible for determining planning applications in its area, Dartford Borough Council retains responsibility for producing Local Plans and policy documents covering the whole of Dartford Borough (including the part of EDC which falls within the Borough's boundaries). This study is principally focused on the Borough of Dartford.'
- 1.3 The Council's strategic local plan document, the 2011 Core Strategy, is under review and the Council is aware that it needs to refresh the evidence base in light of changes to both Government guidance but also the changing demographic and housing market pressures. The purpose of this report is to provide, to the Council, 'a comprehensive assessment of the needs for different sizes, types and tenures of residential development. The assessment will provide a sound evidence base for policies to be included in the Council's new Local Plan, and for the EDC to guide growth.'
- 1.4 This report is a residential needs assessment that addresses this requirement for the Council and provides evidence for the forthcoming Local Plan. The information presented in this report complies with the current Government guidance on undertaking these studies as set out in the 2019 National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG)¹, as described below.

Government Guidance

1.5 The Council is commissioning this assessment at a time of considerable change in the planning system and in the wider development industry. The Government undertook several consultations in the Spring of 2018. To a large extent the outcome of these consultations became clearer with the publication of the 2019 NPPF and the updated PPG. There remain several areas where further announcements are expected, for example in relation to which

¹ The latest iteration of the PPG before the report was finalised was the version as at 22nd July, The report has been written so that is responds to the PPG as at this date.



projections will be used in the future, but for now the overall framework for plan-making has been settled.

- 1.6 In February 2019 the NPPF was further updated and the new PPG published². Paragraph 35 (a) of the 2019 NPPF requires that plans are positively prepared. As a minimum, this requires strategic policies to provide for objectively assessed needs for housing. This carried forward the requirements under the 2012 NPPF and concerns the overall housing requirement. The overall housing requirement is as determined under the Standard Method.
 - 59. To support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay
 - 60. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
 - 61. Within this context, 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, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

Paragraphs 59 to 61 – 2019 NPPF

- 1.7 The requirement for housing is derived through the Standard Method, is then disaggregated into the different types of housing the future population will need. Following which an assessment of the number of households in need of affordable housing must be undertaken. In essence, the first task required by the NPPF for a study of this type is to disaggregate the new housing number as derived through the Standard Method. The second task is the assessment of Affordable Need, and the final task is the understanding of the needs of groups with specific housing requirements.
- 1.8 The NPPF outlines how a Housing Needs Assessment fits into the wider housing policy framework and the PPG sets out how the various elements of a Housing Needs Assessment should be undertaken, including detailing a comprehensive model for the assessment of affordable housing need (Chapter 5). The affordable housing need figure is an unconstrained figure set in the current housing market situation. It is not a component of the overall housing need, but is entirely independent, calculated using a different approach and different data sources.

² It should be noted that during the drafting of this report the PPG on housing needs assessments was divided into three different elements; 'housing and economic needs assessments', 'housing needs of different groups' and 'housing needs of older and disabled people'. This report contains the information that meets the requirements within each of these.



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1.9 This Housing Needs Assessment includes a Long-Term Balancing Housing Markets (LTBHM) model (Chapter 4) which breaks down the overall housing need into the component types (tenure and size) of housing required. Whilst both the Affordable Needs model (Chapter 5) and the LTBHM model (Chapter 4) produce figures indicating an amount of affordable housing required, they are not directly comparable as they use different methods and have different purposes. The affordable housing need figure is calculated in isolation from the rest of the housing market and is used solely to indicate whether the Local Planning Authority should plan for more houses where it could help meet the need for affordable housing³. The figure produced by the LTBHM model is based on the population projections and occupation patterns of household groups (considering the trends in how these occupation patterns are changing). This is the mix of housing that the authority should be planning for. How these figures should be used in Dartford is summarised at the conclusion of this report in Chapter 7.

Local housing market boundaries

1.10 It is useful to consider the functional and geographic context in which the local housing market operates. This is done using secondary data on migration patterns and housing market linkages, including the existing evidence that has been compiled about the local housing markets in the neighbouring authority areas.

Commuting flows

1.11 The most recent detailed profile of commuting flows occurring at the local level is still the 2011 Census. The table below shows the 10 authorities to which residents in Dartford most commonly travelled for work in 2011, alongside the 10 authorities from which people most commonly travelled to work in Dartford. The data indicates that around a third of employed residents in Dartford remained in the Borough to work and that people leaving the Borough for work most commonly went to a neighbouring authority or into central London. The table also shows that 70.1% of people working in Dartford commuted from outside the Borough and that these people commuting into Dartford for work were most likely to live in a neighbouring authority or elsewhere in Kent.

³ The following High Court Judgements are relevant. <u>Satnam Millennium v Warrington BC</u> [2015] EWHC 370 (Admin), <u>Oadby and Wigston v Bloor Homes</u> [2015] EWHC 1879 (Admin), <u>Borough Council of King's Lynn and West Norfolk v Elm Park Holdings Ltd</u> [2015] EWHC 2464 (Admin), <u>Jelson Ltd v Hinckley and Bosworth Borough Council [</u>2016] EWHC 2979 (Admin).



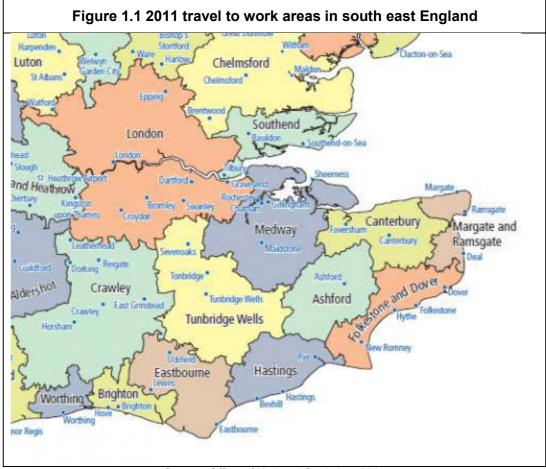
Table 1.1 The ten authorities with which Dartford has the largest travel to work flows					
	rk journeys mad nd over resident		Travel to work journeys made by people aged 16 and over working in Dartford		
Destination authority area	Number of Dartford residents that work there	Proportion of all residents in work that work there	Authority area of residence	Number of people working in Dartford	Proportion of people working in Dartford that live there
Dartford	13,901	33.9%	Dartford	13,901	29.9%
Bexley	5,065	12.3%	Gravesham	6,710	14.4%
Westminster, City of London	3,882	9.5%	Bexley	5,948	12.8%
Gravesham	1,929	4.7%	Medway	3,977	8.5%
Sevenoaks	1,853	4.5%	Sevenoaks	3,010	6.5%
Greenwich	1,797	4.4%	Greenwich	1,740	3.7%
Bromley	1,565	3.8%	Bromley	1,293	2.8%
Tower Hamlets	1,187	2.9%	Maidstone	1,035	2.2%
Southwark	1,162	2.8%	Tonbridge and Malling	918	2.0%
Medway	811	2.0%	Swale	593	1.3%

Source: 2011 Census

1.12 The Office of National Statistics (ONS) used the data on commuting flows collected in the 2011 Census to derive travel to work area boundaries published in 2015⁴. The figure below shows an exert of the national map produced in this process, which concentrates on the travel to work areas in the south east of England. This shows that Dartford is part of the very large London travel to work area according to the criteria and thresholds used by the ONS.

⁴ The criteria applied by the ONS was that the travel to work areas had to have a working population of at least 3,500 and that at least 75% of an area's resident workforce work within the area and at least 75% of the people who work in the area also live in the area. For areas with a working population in excess of 25,000, self-containment rates as low as 66.7% were accepted.





Source: Office of National Statistics, 2015

Migration trends

- 1.13 The 2017-based population estimates produced by the Office of National Statistics (ONS) model detail on the origin and destination of people that moved into and out of Dartford in the previous year⁵. The table below shows the 10 authorities which residents in Dartford most commonly moved to in the year up to June 2017. The table also contains a column that details the equivalent proportion of movers from Dartford in the year prior to the 2011 Census that had the same destination this enables a comparison of the changing relationship between these authorities and Dartford⁶.
- 1.14 The data indicates that Bexley is the authority to which people from Dartford most commonly moved to in the year up to June 2017, followed by Gravesham, Medway and Sevenoaks.

⁶ It should be noted that internal flows within Dartford are not included in this analysis as they are not documented in the population estimates, the analysis only concerns people moving into the Borough from elsewhere in the UK.



 $[\]underline{\text{https://www.ons.gov.uk/people population and community/population and migration/migration within the uk/datasets/internal migration by originand destination local authorities sex and single year of a gedetailed estimates dataset \underline{\text{migration}}. }$

Whilst flows to Bexley have reduced in relative scale since the 2011 Census (from 15.6% of all out-migrants from Dartford moving there in 2011 to 12.6% of out-migrants in 2017), the reduction in flows to Gravesham has been more marked (from 16.6% of out-migrants in Dartford in 2011 to 11.8% in 2017) and Bexley has replaced Gravesham as the most common destination for those leaving Dartford. In comparison Medway, Maidstone, Tonbridge and Malling and Canterbury are all areas that have become increasingly common destinations for those leaving Dartford recently (as a greater proportion of out-migrants from Dartford moved to these areas in 2017 than was the case in 2011).

1.15 It is important to note that the 2017 figures for migration flows are not as accurate as those recorded in the 2011 Census and although the ONS does not provide detail of the margin of error of these estimates they do note that 'these estimates are based on several data sources and estimation processes, and are not exact counts.7'

Table 1.2 The ten authorities with which Dartford has the largest outward migration flows in 2017						
Peo	ple that moved out	of Dartford in the preced	ling year			
	2017		2011			
Destination authority area	Number of Dartford residents that moved there	Proportion of all residents leaving Dartford that moved there	Proportion of all residents leaving Dartford that moved there			
Bexley	811	12.6%	15.6%			
Gravesham	758	11.8%	16.6%			
Medway	550	8.5%	6.5%			
Sevenoaks	428	6.6%	8.8%			
Maidstone	240	3.7%	2.2%			
Tonbridge and Malling	218	3.4%	2.2%			
Greenwich	188	2.9%	3.3%			
Bromley	185	2.9%	3.3%			
Canterbury	158	2.4%	1.4%			
Swale	133	2.1%	2.2%			

ONS Population estimates, 2017; 2011 Census

⁷ User information for Table IM2017-1a: Detailed estimates dataset – internal migration by origin and destination local authorities, sex and single year of age, year ending June 2017. (page 2 under Disclosure Control).



- 1.16 The table below shows the 10 authorities from which residents most commonly moved to Dartford in the year up to June 2017. The table also contains a column that details the equivalent proportion of movers to Dartford in the year prior to the 2011 Census that originated from the same location⁸.
- 1.17 The data indicates that Bexley is the authority people that moved into Dartford most commonly came from in the year up to June 2017, followed by Greenwich, Gravesham and Lewisham. Whilst flows from Bexley have reduced in relative scale since the 2011 Census (from 25.2% of all in-migrants to Dartford in 2011 to 22.7% of in-migrants in 2017), the flows of people are still over double the authority from which the second highest number of in-migrants are recorded Greenwich. The data indicates that whilst moves from Gravesham, Sevenoaks and Bromley have reduced in importance (a smaller proportion of in-migrants to Dartford moved from these areas in 2017 than was the case in 2011), moves from inner London Boroughs have become more significant (a larger proportion of in-migrants to Dartford moved from Greenwich, Lewisham, Newham and Redbridge in 2017 than was the case in 2011).

Table 1.3 The ten authorities with which Dartford has the largest inward migration flows in 2017						
Ped	pple that moved int	o Dartford in the precedi	ing year			
	2017		2011			
Original authority area of residence	Number of people that moved to Dartford	Proportion of all people moving to Dartford	Proportion of all people moving to Dartford			
Bexley	1,817	22.7%	25.2%			
Greenwich	796	9.9%	8.9%			
Gravesham	624	7.8%	9.2%			
Lewisham	446	5.6%	3.8%			
Bromley	427	5.3%	5.7%			
Sevenoaks	408	5.1%	9.3%			
Medway	254	3.2%	3.6%			
Southwark	181	2.3%	2.1%			
Newham	168	2.1%	1.4%			
Redbridge	159	2.0%	0.2%			

ONS Population estimates, 2017; 2011 Census

 $^{^{\}rm 8}\,{\rm As}$ before internal flows within Dartford are not included in this analysis.



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- 1.18 The table below considers how the age profile of people moving into Dartford in the year up to June 2017 varies by their broad previous location the top 10 authorities listed above have been grouped into three categories, outer London Boroughs (Bexley and Bromley), inner London Boroughs (Greenwich, Lewisham, Newham, Redbridge and Southwark) and other Kent authorities (Gravesham, Sevenoaks and Medway). The table also considers how the age profile of in-migrants to Dartford in 2017 compares with that recorded in 2011.
- 1.19 The data suggests that those moving from other Kent authorities are more likely than average to be older (12.3% of people that moved into Dartford from these areas were aged 60 or over compared to 7.2% of all people that moved into the Borough in 2017). In comparison those travelling from inner London are more likely to be families (a greater proportion than average of both those aged between 30 and 44 and those aged under 15). It is also clear from the table that the age of residents moving to the Borough in 2017 is broader than was recorded in 2011, with a greater proportion of in-migrants being from all ages groups in 2017 than was the situation in 2011 other than those aged 15 to 29, who were the predominant age group in-migrants in 2011.

Table 1.4 Age profile of people that moved into Dartford in 2017						
		2017			2011	
Age profile	People moving from outer London Boroughs ⁹	People moving from inner London Boroughs ¹⁰	People moving from Kent authorities ¹¹	All people moving to Dartford	All people moving to Dartford	
0-14	24.0%	25.8%	23.5%	22.6%	17.5%	
15-29	26.6%	18.9%	24.7%	28.0%	38.4%	
30-44	31.1%	38.6%	23.9%	30.9%	27.4%	
45-59	10.8%	11.2%	15.5%	11.3%	9.9%	
60+	7.6%	5.4%	12.3%	7.2%	6.8%	
All ages	100.0%	100.0%	100.0%	100.0%	100.0%	

ONS Population estimates, 2017; 2011 Census

Housing market indicators

1.20 It is useful to compare the price of housing in Dartford with the authorities closest to it to see the similarities and differences between the housing markets in the areas. The table below presents the average property price for dwellings sold in Dartford and the surrounding

¹¹ Gravesham, Sevenoaks and Medway



⁹ Bexley and Bromley

¹⁰ Greenwich, Lewisham, Newham, Redbridge and Southwark

authorities in 2018. The table shows the overall average price of homes sold as well as the average for each dwelling type categorised by the Land Registry.

1.21 The table indicates that homes in Sevenoaks and Bromley are notably more expensive than in the other areas profiled and that Medway has the cheapest property prices. Prices in Dartford are more expensive than Thurrock and Gravesham and cheaper than Bexley. Whilst the overall average price for Dartford is closest to that recorded for Gravesham (homes in Gravesham are 3.4% cheaper overall), the average price for detached houses as well as flats in Dartford are most similar to those found in Bexley.

Table 1.	Table 1.5 Average property prices in 2018 in Dartford and surrounding authorities					
Location	Detached	Semi- detached	Terraced	Flat	Overall average price	
Dartford	£559,105	£369,068	£318,574	£228,301	£329,633	
Thurrock	£461,432	£332,584	£282,401	£185,984	£296,264	
Bexley	£577,912	£424,762	£356,278	£241,178	£365,812	
Bromley	£841,510	£542,235	£447,671	£342,431	£497,581	
Sevenoaks	£847,842	£447,004	£360,748	£296,072	£517,695	
Gravesham	£495,919	£344,660	£278,256	£172,834	£318,496	
Medway	£436,506	£293,544	£232,783	£177,685	£264,713	

Source: Land Registry

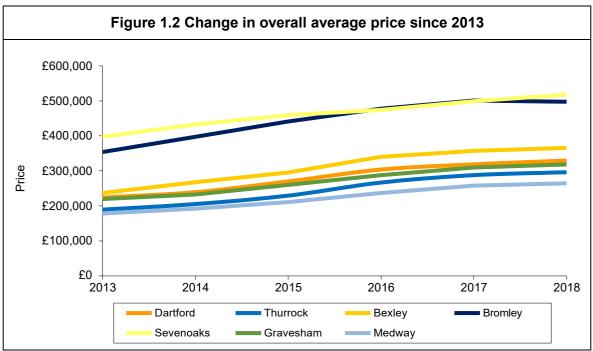
1.22 The table below shows the distribution of sales by property type in each of these areas in 2018, which allows comparison of the profile of dwelling stock in each authority. The data indicates that in Dartford sales of terraced houses and flats are most common and sales of detached houses are least frequent. The data implies that Sevenoaks is the authority with the accommodation profile most distinct to Dartford, with Bromley and Thurrock recording a profile of property sales that is most similar.

Table 1.6 Distribution of property sales in 2018					
Location	Detached	Semi- detached	Terraced	Flat	Total sales
Dartford	11.2%	24.0%	33.8%	31.0%	2,371
Thurrock	12.2%	28.8%	35.6%	23.4%	2,410
Bexley	5.7%	37.6%	31.7%	25.0%	2,935
Bromley	15.9%	25.3%	24.1%	34.8%	4,504
Sevenoaks	30.0%	25.6%	27.3%	17.1%	1,719
Gravesham	16.9%	27.9%	41.0%	14.2%	1,257
Medway	10.9%	28.6%	46.5%	14.0%	3,975

Source: Land Registry



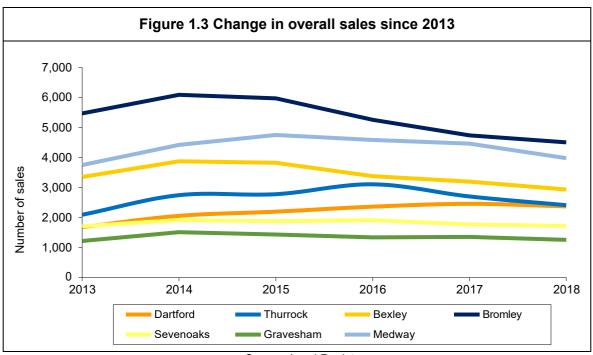
1.23 The figure below shows the change in average overall property price in each council area over the last five years. The figure shows that prices have continued to rise steadily in all areas, however over the last five years prices have increased the most in Thurrock (by 56.5%) and the smallest increase has been recorded in Sevenoaks (30.3%). Prices in Dartford have risen by 47.2% between 2013 and 2018, which is most similar to the price rises in Medway (48.4%) and Gravesham (45.1%).



Source: Land Registry

1.24 The figure below shows the change in the number of property sales in each council area over the last five years. It is interesting to note that Dartford has recorded by far the largest rise in sales (a 41.0% increase, with Thurrock recording the next largest growth at 15.3%). Sales in Bexley and Bromley have fallen notably (by 12.4% and 17.6% respectively) whilst in Sevenoaks, Gravesham and Medway, sales levels have remained largely static (growth of less than 5%).





Source: Land Registry

Existing evidence from neighbouring authorities

1.25 Gravesham is to the east and is an authority which was also previously identified for high levels of growth in addition to Dartford, in the former South East Plan as part of the Kent Thames Gateway (although the housing target in Gravesham was lower than that in Dartford). Gravesham is also the Borough in which the other part of the EDC is located. The 2016 *Gravesham Strategic Housing Market Assessment* (SHMA)¹² presented a large amount of data on migration flows, travel-to-work trends and housing market variations across the wider north west Kent area and concluded 'that Gravesham should not be defined as a self-contained Housing Market Area, but forms part of a wider HMA that includes; Gravesham; Medway and Dartford^{13' 14}. There are more recent versions of some of the data on which this conclusion was derived, which has been analysed in the preceding sections.

¹⁴ It should be noted that Dartford is not included within Medway's housing market area as defined in the Medway Strategic Housing Market Assessment https://www.medway.gov.uk/downloads/file/633/strategic housing market assessment shma (paragraph 2.106)



^{12 &}lt;u>https://localplan.gravesham.gov.uk/gf2.ti/f/912450/36301573.1/PDF/-/SHENA 3 Strategic Housing Markets Assessment.pdf</u>

¹³ Paragraph 2.68

- 1.26 Sevenoaks is immediately to the south of Dartford. It is quite different to Dartford in terms of its character and its recent housing strategy. The 2015 Sevenoaks & Tunbridge Wells SHMA¹⁵ concluded that 'an appropriate definition of the Housing Market Area would include Sevenoaks, Tonbridge, Tunbridge Wells and Crowborough.....However for practical purposes it is useful to consider the 'best fit' of local authorities to housing market areas, not least as demographic projections are developed on this basis '16</sup>. The SHMA report was clear that Dartford is not considered part of the same HMA as Sevenoaks.
- 1.27 To the west of Dartford are the London Boroughs of Bexley and Bromley, which are covered by the London Plan. The 2017 London SHMA¹⁷, produced as part of the London Plan evidence base, makes it clear that London is a housing market area on its own and although its influence extends beyond the boundaries of London, it is sensible to use the area of London as a planning boundary. The document states 'London can be considered as single housing market area'¹⁸. Despite this, there are strong local links between the London Borough of Bexley and Dartford due to the transport connections and the proximity of some of its urban centres to Dartford, in particular Crayford. It should be noted that whilst the draft London Plan (December 2017) is seeking to accommodate the vast majority of London's future growth, in order to plan for longer-term contingencies, the Mayor is interested in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital.
- 1.28 To the north of Dartford, the neighbouring authority of Thurrock is on the other side of the River Thames. Despite the notable transport infrastructure joining the two, there is a relatively small historical overlap between the two authorities as the river provides something of a barrier. However, it is worth briefly noting that the South Essex Strategic Housing Market Assessment published in May 2016¹⁹ concluded 'that it is appropriate to consider Basildon, Castle Point, Rochford, Southend-on-Sea and Thurrock as a single housing market area, in line with the PPG. ²⁰ Dartford is not considered part of the same HMA as Thurrock.
- 1.29 It is important to note that all these reports examining the HMA boundaries in the authorities closest to Dartford were produced before the revised PPG and NPPF were published earlier this year. The previous guidance put an emphasis on defining the housing market area,

https://www.sevenoaks.gov.uk/downloads/file/361/strategic housing market assessment shma september 201 5

²⁰ Paragraph 2.56



¹⁵

¹⁶ Paragraph 3.68 and 3.69

¹⁷ https://www.london.gov.uk/sites/default/files/london_shma_2017.pdf

¹⁸ Paragraph 1.11

 $^{^{19}\,\}underline{\text{https://www.thurrock.gov.uk/sites/default/files/assets/documents/lptech-south-essex-strategic-housing-market-assessment-201605-v01.pdf}$

however this requirement is not included in the current versions of these documents and there is a presumption that local authorities should work to their own boundaries, as the NPPF notes 'Strategic policy-making authorities should establish a housing requirement figure for their whole area'²¹. As a consequence, the analysis of the housing market area in Dartford presented below will be confined to Dartford Borough. Having said this, knowledge of the housing market area boundaries is now useful contextual information, particularly in the context of the 'duty to cooperate', which remains an important planning consideration.

Conclusion

1.30 The analysis of Dartford and its neighbouring authorities presented above suggests that the most established linkages are those with the neighbours immediately to the west and east of the Borough – Bexley and Gravesham reflecting the pattern of migration flows around London to move radially outwards. It is interesting to note that the flows between Dartford and Bexley are strong both ways. Whilst the Gravesham SHMA concluded that Dartford was part of a housing market area with Gravesham and Medway, the latest information on market flows suggest that the interaction between Dartford and Gravesham is reducing. In fact, the authority with which Dartford appears most aligned appears to be Bexley, not only for the number of people moving between the areas, but the similarity of the housing markets. As Bexley is considered as part of London administratively and is covered by the London Plan, and Dartford is not, it seems suitable to consider the Borough as its own housing market, although one with close links to neighbouring authorities. This approach aligns with what is suggested in the PPG.

Report coverage

- 1.31 This report is focused on detailing the amount of new housing required over the plan period in Dartford, the size and tenure of housing that would be most suitable for the future population, the housing requirements of specific groups of the population and the level of affordable housing need that exists in the Borough. The report contains the following:
 - Chapter 2 presents an examination of the latest data on the labour market and the resident population and a profile of the housing stock in Dartford and the changes that have occurred within them. The PPG indicates that 'Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process²².' Chapter 2 also sets out the calculation of the local housing need figure in the Borough.
 - **Chapter 3** contains a detailed analysis of the cost of property in Dartford and the affordability of the different forms of housing for residents.

²² PPG Paragraph: 008 (Reference ID: 2a-008-20190220)



²¹ Paragraph 65

- **Chapter 4** disaggregates the local housing need to show the demographic profile of the future population in Borough. The chapter uses this information to produce an analysis of the nature of future housing required within the long-term balancing housing markets model (LTBHM).
- **Chapter 5** sets out the calculation of outputs for the affordable housing needs model strictly in accordance with the PPG approach. The chapter identifies both the type of households in housing need and the tenure of affordable housing that would meet this housing need.
- **Chapter 6** contains an analysis of the specific housing situation of the particular subgroups of the population identified within the NPPF alongside some other sections of the household population that the Council has identified.
- **Chapter 7** is a conclusion summarising the implications of these results.

Stakeholder consultation

1.32 To help disseminate the purpose of this work and ensure the accuracy of this report (and the assumptions used) stakeholders' views have been sought through the development of this study. A consultation event was held on the 20th June 2019, after which written comments were invited. A 'Duty to Cooperate' event run with the Council's local authority partners was held on 7th August, after which written feedback was invited. Details of both the stakeholder consultation and the Duty to Cooperate event are presented in Appendix 1 to this report.



2. Market drivers and the extent of housing need

Introduction

- 2.1 Two main drivers of the housing market are the resident population and the local labour market. They affect the nature of housing demand, including household formation rates and households' investment in housing. This first part of this chapter uses the most recently available data to document the current socio-economic profile in Dartford and how it has changed.
- 2.2 Analysis of the stock of housing allows an understanding of the current market balance and existing occupation patterns. A range of data sources, including the 2011 Census, are used to provide an overview of the housing stock in Dartford and a comparison to the regional and national situation will be presented where the data is available.
- 2.3 This socio-economic situation is important context to be understood before the level of housing need is calculated. As stated in the Planning Practice Guidance (PPG)²³, 'housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for.'
- 2.4 As the PPG²⁴ further indicates 'the National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need.' The second part of this chapter sets out the calculation of the housing need for Dartford using the Standard Method.

Demography

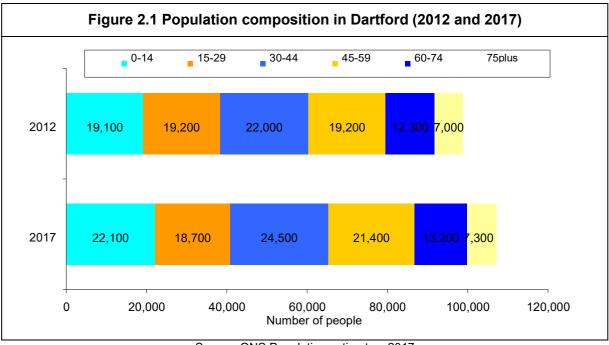
- 2.5 The 2017-based population estimates produced by the ONS show the age profile of the population in Dartford and how it has changed over the last 5 years. These population estimates indicate that the resident population in Dartford in 2017 was 107,200 and that since 2012 the population had increased by 8.5%, around 8,400 people. In comparison, the population of the South East region increased by 4.1% over the same period, whilst the population of England grew by 4.0%.
- 2.6 The figure below illustrates the age composition of the population in Dartford in 2012 and 2017 according to the latest population estimates. The data shows that since 2012 the number of people aged under 15 has markedly increased in the Borough. In contrast, the number of people aged between 15 and 29 has decreased. The 2017-based population estimates

²⁴ Paragraph: 002 Reference ID: 2a-002-20190220



²³ Paragraph: 001 Reference ID:2a-001-20190220

indicate that the median age in Dartford in 2017 was 37.4, whilst for the South East the figure was 41.5 and across England it was 39.8.



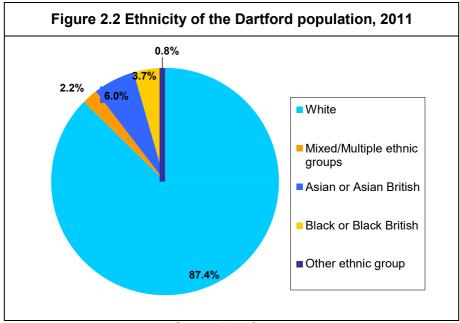
Source: ONS Population estimates, 2017

2.7 The population density in Dartford in 2017 was 1,478 people per sq. km according to the 2017-based population estimates, notably greater than the figure for the region (476 people per sq. km) and England as a whole (427 people per sq. km).

Ethnicity

2.8 The 2011 Census suggests that the BAME population was 12.6% of the total population in Dartford, which was higher than the regional figure (9.3% in the South East), but lower than the national figure (14.5% in England). The figure below presents the ethnicity of the population in Dartford in 2011. The 'Asian or Asian British' represents the largest BAME group in Dartford area (comprising 6.0% of total population). It should be noted that the 'White' group in Dartford includes 'White Irish' (0.8%) 'White Gypsy and Traveller (0.3%) and 'White Other' (3.7%) as well as 'White British' (82.6%).





Source: 2011 Census

2.9 The 2017-based population estimates estimate that in 2017, just 0.5% of the population of Dartford had been resident in the UK for less than a year, compared to 0.8% in the South East region and 0.9% across England.

Number of households

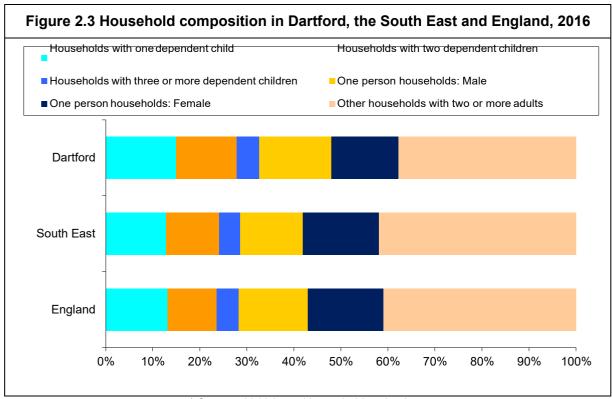
2.10 The 2016-based household projections indicated that the number of households in Dartford has increased by 7.8% since 2011, reaching 42,944 households in 2016. This compares to the regional average of 4.5% and the national figure of 4.1%. In Dartford the household population has increased at a marginally slower rate than the number of households between 2011 and 2016, resulting in a falling average household size, as is illustrated in the table below. However, at both a regional and a national level the number of households has risen at the same rate as the population in households and the average size of households has remained unchanged.

Table 2.1 Change in average household size between 2011 and 2016						
Location Average household size Average house in 2011 in 201						
Dartford	2.43	2.42				
South East	2.39	2.39				
England	2.37	2.37				

Source: Mid-year population and household estimates

2.11 The figure below compares the household composition in Dartford in 2016 with that recorded for the South East region and England. The data indicates that there are more households with dependent children and fewer other households with two or more adults in Dartford than are recorded regionally and nationally.





* Source: 2016-based household projections

Economy

2.12 Considerable data is available on the economic context in Dartford, which enables a profile of the current local economy to be presented.

Employment in Dartford

- 2.13 NOMIS²⁵ data on 'job density' (this is a measure of the number of individual jobs²⁶ per person of working age) for 2017 shows that there are 0.97 jobs per working age person in the Borough, compared to 0.87 jobs per working age person across both the South East region and England as a whole. Whilst the level of job density in Dartford has risen slightly over the last five years (from 0.96 in 2012 to 0.97 now), job density has increased across the region and England as whole (from 0.81 to 0.87 in the South East and from 0.79 to 0.87 nationally).
- 2.14 Measured by the ONS Business Register and Employment Survey there were 57,000 individual employee jobs²⁷ in Dartford in 2017. This is the lowest level recorded in the Borough

²⁷ Employee jobs excludes self-employed, government-supported trainees and HM Forces. Employee jobs can be both part-time and full-time. Data also excludes farm-based agriculture.



²⁵ NOMIS is a website provided by the Office for National Statistics that contains a range of labour market data at a local authority level. www.nomisweb.co.uk.

²⁶ Jobs includes employees (both full and part-time), self-employed, government-supported trainees and HM Forces.

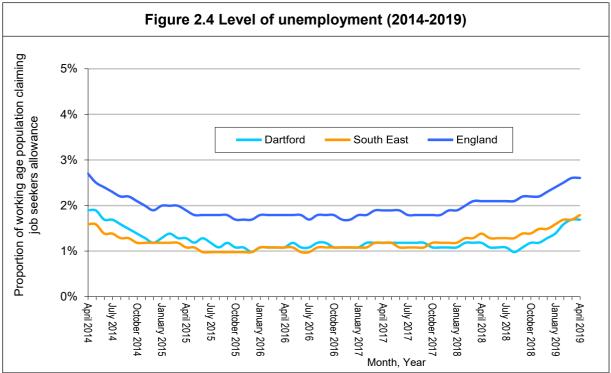
since the collection of this data was begun in 2015 (the data source is only two years old). Overall the number of employee jobs in Dartford has decreased by 8.1% between 2015 and 2017, compared to an increase of 0.7% for the region and an increase of 2.8% nationally over the same time period. Whilst the decrease recorded for Dartford appears large, it is worth noting that all the figures produced by this data source are rounded to the nearest thousand so fluctuations will appear larger where there is a lower base population.

2.15 Data is also available from the ONS about the number of businesses in the area and how this has changed. This can provide an indication of the state of the economy as an increase in businesses would suggest either new companies moving to the area or an increase in local entrepreneurship. The ONS indicates that in 2018 there were 4,240 enterprises in Dartford. A very similar proportion of enterprises are micro (with 9 or fewer employees) across Dartford (89.9%) compared with the South East (89.9%) and England (89.5%). In Dartford the number of enterprises has increased by 38.6% between 2013 and 2018 (a rise of 1,180), notably larger than both the regional (19.0%) and national (24.7%) increases.

Employment profile of residents in Dartford

- 2.16 Although the overall economic performance of the Borough provides important context, an understanding of the effect of the economic climate on the resident population is more pertinent to this study.
- 2.17 The ONS publishes the number of people claiming Job Seekers Allowance on a monthly basis. This provides a very up-to-date measure of the level of unemployment of residents in an area. The figure below shows the change in the proportion of the working age population claiming Job Seekers Allowance in Dartford, the South East and England over the last five years. The figure indicates that the unemployment level in Dartford, whilst fluctuating notably, has been notably lower than the national level and broadly similar to the regional figure. Currently 1.7% of the working age population in Dartford are unemployed, compared to 1.8% regionally and the national average of 2.6%. Over the last five years, unemployment has decreased in Dartford by 6.7%, compared to a rise of 8.5% in the South East and no change nationally.





Source: ONS Claimant Count

2.18 The Annual Population Survey presents a 'Standard Occupation Classification' which categorises all working people resident within an area into one of nine groups depending on the nature of the skills that they use. These nine groups are graded from managerial jobs (Groups 1-3) to unskilled jobs (Groups 8-9). As the table below illustrates, some 53.2% of employed residents in Dartford work in Groups 1 to 3, higher than the figure for both the South East region and the national one. Further analysis shows that, since 2013, there has been a considerable increase in the number of people resident in Dartford employed within Groups 8 to 9 and Groups 1 to 3 and a notable fall in the number of people employed within Groups 4 to 5 and Groups 6 to 7.



Table 2.2 Occupation structure (2018)					
Occupation Groups	Dartford	South East	England	Change in # of people employed in Dartford since 2013	
Group 1-3: Senior, Professional or Technical	53.2%	50.8%	46.8%	34.5%	
Group 4-5: Administrative, skilled trades	17.1%	19.8%	20.0%	-5.6%	
Group 6-7: Personal service, Customer service and Sales	14.0%	15.9%	16.3%	-6.7%	
Group 8-9: Machine operatives, Elementary occupations	14.3%	13.1%	16.6%	25.0%	
Total	100.0%	100.0%	100.0%	-	

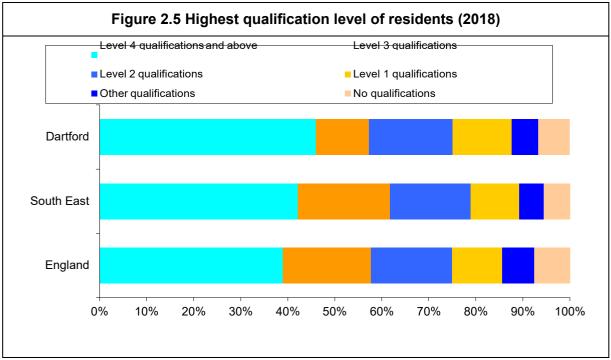
Source: Annual Population Survey, 2018

Qualifications

2.19 An important factor in the ability of any economy to grow is the level of skill of the workforce. The figure below shows the highest qualification level of the working-age residents of Dartford, compared to the regional and national equivalents as recorded in the Annual Population Survey. Level 1 qualification is the lowest (equivalent of any grade at GCSE or O-Level) and Level 4 the highest (undergraduate degree or higher)²⁸. The data indicates that 46.0% of working-age residents in Dartford have level 4 or higher qualifications, higher than the figures for the South East region (42.2%) and England (39.0%). Dartford does however have more residents with no qualifications than is found regionally. It is important to note however that in Dartford, the proportion of working-age residents without qualifications has reduced notably since 2013 (by 15.1%)

²⁸ These definitions come from the data source (at www.nomisweb.co.uk/) and may differ slightly from the banding used on the guide to qualification levels located on the www.gov.uk site.



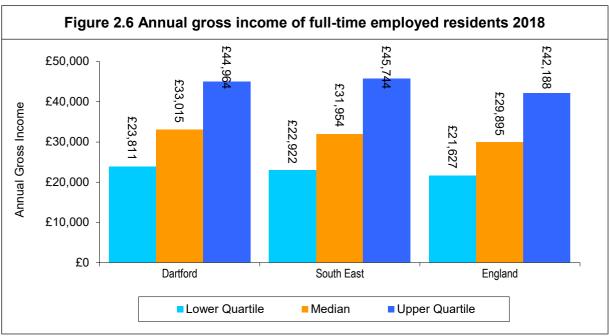


Source: Annual Population Survey, 2018

Income

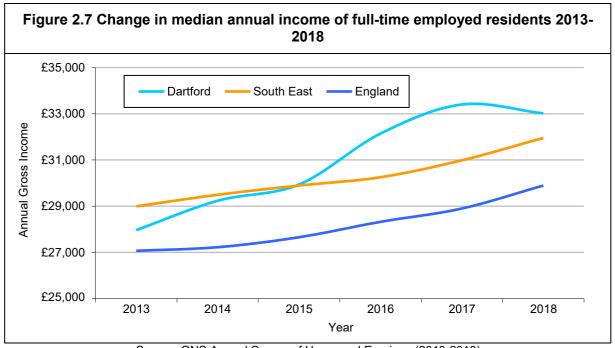
- 2.20 Income has a core effect on the level of choice a household has when determining their future accommodation. The mean earned gross income for full-time employees resident in Dartford in 2018 was £37,918, according to the ONS Annual Survey of Hours and Earnings. In comparison, the regional figure was £38,979 and the national average was £36,192. It is important to note that these figures assess individual incomes rather than household incomes. It should also be noted that the median figures (set out in the figure below) provide a more accurate average than the mean figures are they are less influenced by extreme values, however the mean figures are presented for context.
- 2.21 The figure below shows that despite the South East recording a higher mean income, the lower quartile and median income levels are higher in Dartford. At all points on the distribution annual gross income in Dartford is higher than the national equivalents. In Dartford there is a relatively small difference between higher earners and lower earners.





Source: ONS Annual Survey of Hours and Earnings (2018)

2.22 The figure below shows the change in the median income of full-time employees resident in Dartford, the South East region and England since 2013. Dartford has recorded the highest increase since 2013 (at 18.1%) followed by England (10.4%), and the South East (10.2%).

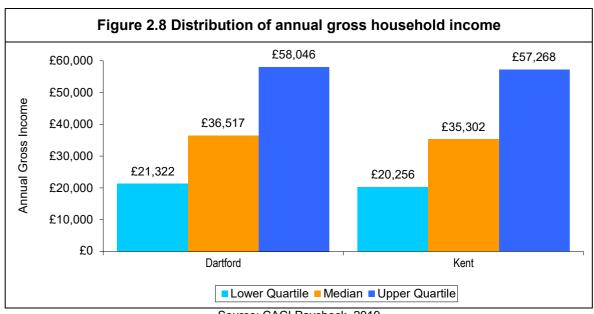


Source: ONS Annual Survey of Hours and Earnings (2013-2018)



Household income

2.23 CACI Paycheck²⁹ estimates that the mean gross annual household income in Dartford is £43,646, which is 1.6% above the equivalent for the County (£42,958 for Kent). The figure below shows household income at various points on the income distribution for the Borough alongside the County-wide equivalents. The data indicates that households in Dartford are more slightly more affluent than equivalent Kent-wide households at all points on the income distribution.



Source: CACI Paycheck, 2019

Dwelling stock

2.24 The latest Ministry of Housing, Communities and Local Government (MHCLG) live tables³⁰ indicates that there were 46,926 dwellings in Dartford in 2018, and that over the last five years the number of dwellings had increased by 10.3%, over 4,300 properties. In comparison, the dwelling stock in the South East region increased by 4.3% between the 2013 and 2018, whilst the dwelling stock of England increased by 4.0%.

Accommodation profile

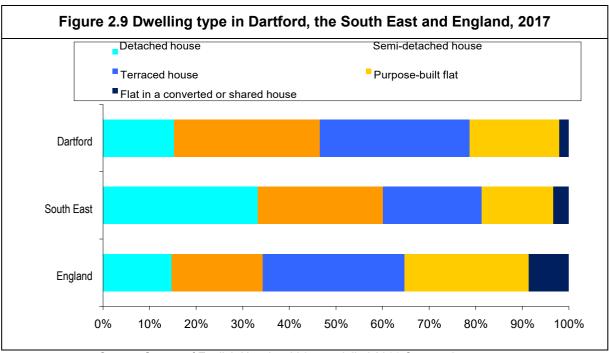
2.25 The figure below compares the type of accommodation in Dartford in 2017 with that recorded for the South East region and England. Dartford contains more semi-detached and terraced houses than the regional and national averages. The Borough contains notably fewer detached properties than is found across the region, however it contains a smaller proportion

 $^{^{30}\,\}underline{\text{https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants}$



²⁹ CACI is a commercial company that provides households income data.

of flats than is found nationally. The most common property type in Dartford is terraced houses followed by semi-detached dwellings.



Source: Survey of English Housing 2017, modelled 2011 Census data

2.26 The table below compares the size of accommodation (in terms of rooms) in Dartford the South East region and England. The table indicates that Dartford has a greater proportion of smaller homes (four or fewer rooms) and fewer larger dwellings (homes with 6 or more rooms) than the South East region and England as a whole. Overall, four and five room homes account for over half of all dwellings in Dartford.

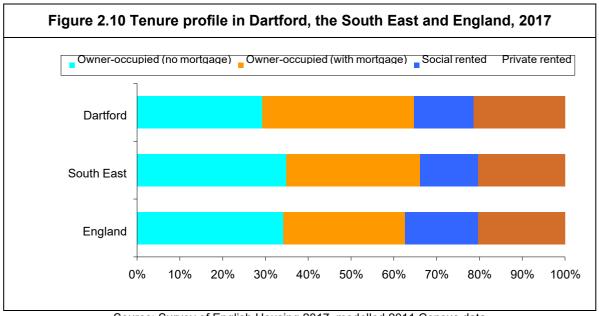
Table 2.3 Size of dwelling stock in Dartford, the South East and England, 2017							
Property size*	Dartford	South East	England				
2 or fewer rooms	1.3%	1.1%	0.6%				
3 rooms	13.0%	10.7%	9.9%				
4 rooms	22.9%	21.8%	22.2%				
5 rooms	31.0%	28.3%	29.1%				
6 rooms	19.1%	18.4%	19.6%				
7 rooms	7.9%	10.1%	10.1%				
8 or more rooms	4.7%	9.7%	8.5%				
Total	100%	100%	100%				

^{*}The number of rooms available excludes utility rooms but does include bathrooms and kitchens. Source: Survey of English Housing 2017, modelled 2011 Census data



Tenure

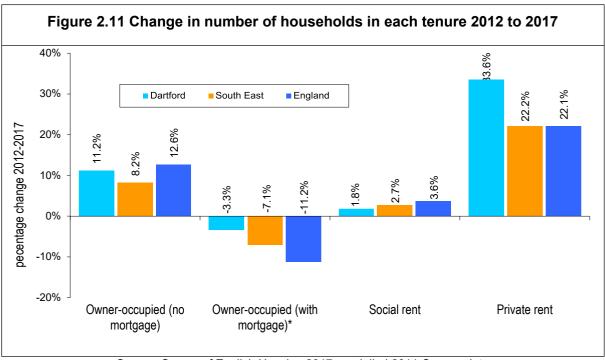
2.27 The figure below compares the tenure of households in Dartford in 2017 with that recorded for the South East region and England. The data indicates that 29.3% of households in the Borough are owner-occupiers without a mortgage, compared to 34.9% in the region and 34.1% nationally. The proportion of owner-occupiers with a mortgage in Dartford (35.5%) is however higher than both the regional (31.3%) and national average (28.4%). Some 13.9% of households in Dartford are resident in the Social Rented sector, higher than the figure for the South East region (13.5%) but lower than the national average (17.1%). Finally, some 21.4% of households in Dartford live in private rented accommodation, compared to 20.3% in both the South East region and across England.



Source: Survey of English Housing 2017, modelled 2011 Census data

2.28 The figure below shows the change in the size of each tenure between 2012 and 2017. The figure shows that in all areas the private rented sector has increased dramatically and the number of owner-occupiers with no mortgage has also grown. In comparison, the number of owner-occupiers with a mortgage has decreased. The Social Rented sector has generally shown the smallest change.

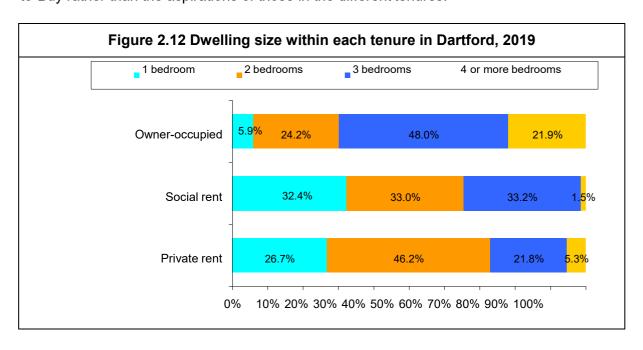




Source: Survey of English Housing 2017, modelled 2011 Census data

Tenure by bedroom

2.29 Finally, it is useful to understand the size of accommodation within each tenure as recorded in the LTBHM model (discussed further in Chapter 4). This is shown in the figure below. The data indicates that in Dartford, rented accommodation is smaller on average than owned dwellings. This pattern is common across the country and reflects of the profile of dwellings built in each sector alongside the size of homes lost from the affordable stock through Right-to-Buy rather than the aspirations of those in the different tenures.





Housing Need – The Standard Method

2.30 As stated in the introduction to this chapter, it is expected that authorities follow the Standard Method set out in the PPG to determine the minimum annual local housing need figure. The PPG makes it clear that whilst it is not mandatory, any deviation from the Standard Method should only be pursued in exceptional circumstances. This section will describe the steps involved in the Standard Method, following the approach described in paragraph of the PPG³¹, and calculate the figure for Dartford.

Step 1 – Setting the baseline

- 2.31 The baseline is set using the 2014-based household projections in England³². The PPG indicates that 'Using these projections, calculate the projected average annual household growth over a 10-year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period).'
- 2.32 This source indicates that the number of households in Dartford will grow from 45,277 in 2019 to 51,161 in 2029, which equates to 5,884 extra households over the decade or an average of 588 per year.
 - Step 2 An adjustment to take account of affordability³³
- 2.33 The average annual projected household growth figure produced in Step 1 should then be adjusted to reflect the affordability of the area using the most recent median workplace-based affordability ratios³⁴. An adjustment is only required where the ratio is higher than 4 and 'for each 1% the ratio is above 4 (with a ratio of 8 representing a 100% increase), the average household growth should be increased by a quarter of a percent.' The precise formula is detailed in the PPG:

 $^{{\}it 34} 6 \underline{\text{https://www.ons.gov.uk/people-population} \underline{\text{arningslowerquartile} \underline{\text{and}} \underline{\text{median}}} \\$



³¹ All the steps are described in paragraph: 004 Reference ID: 2a-004-20190220

³² https://www.gov.uk/government/collections/household-projections. Paragraph 005 of the PPG (Reference ID: 2a-005-20190220) states that the 2014-based projections are used (in preference to the more recently published 2016-based projections) as they are more suitable for meeting 'the Government's objective of significantly boosting the supply of homes.'

³³ Paragraph 006 of the PPG (Reference ID: 2a-005-20190220) describes why an affordability ratio is applied – principally to account for any constrained household formation and to ensure that people aren't prevented from undertaking employment opportunities by the prohibitive cost of housing in the area near their proposed workplace. The affordability adjustment also accounts for past under-delivery as described in Paragraph 011 of the PPG (Reference ID: 2a-011-20190220).

$$Adjustment\ factor = \left(\frac{Local\ affordability\ ratio\ -4}{4}\right)x\ 0.25 + 1$$

2.34 The affordability ratio in Dartford in 2018 is 9.67. The adjustment factor is therefore of 1.354375³⁵. Applying this to the average annual projected household growth figure of 588, results in an annual local housing need figure of 797 per year.

Step 3 – Capping the level of any increase

2.35 As the PPG describes:

'A cap is then applied which limits the increases an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing. Where these policies were adopted within the last 5 years (at the point of making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies. 36' Alternatively 'where the relevant strategic policies for housing were adopted more than 5 years ago..., the local housing need figure is capped at 40% above whichever is the higher of:

- a. the projected household growth for the area over the 10-year period identified in step 1; or
- b. the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists).'
- 2.36 In Dartford the most recent planning document is the Council's 2011 Core Strategy. This is over five years old, so the second of the two approaches described by the PPG is applied.
- 2.37 The first of the two possible caps is based on a 40% increase of the annual household growth identified in Step 1. This cap is therefore 824 in Dartford (588 x 1.4).
- 2.38 The second of the two caps is based on a 40% increase to the annual housing requirement set out in the 2011 Core Strategy. This document stated an aim to build 17,300 dwellings in the Borough over 20 years, an annual total of 865. This second cap is therefore 1,211 in Dartford (865x1.4).
- 2.39 The second of the two caps is higher and represents the upper boundary for any increase, however the annual local housing need figure of 797 per year in Dartford is within this cap and therefore does not need to be modified. **The Housing Need in Dartford, as assessed using the Standard Method is 797 per year**.

³⁶ 'This also applies where the relevant strategic policies have been reviewed by the authority within the 5-year period and found to not require updating.'



³⁵ 9.67-4=5.67, 5.67/4=1.14175, 1.14175*0.25=0.354375, 0.354375+1= 1.354375

Overall level of housing need

- 2.40 The PPG³⁷ notes that whilst 'the standard method may change as the inputs are variable..., local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination.' Whilst Paragraph 010 the PPG includes a number of conditions where it may be appropriate to pursue a higher housing need figure than is indicated by the Standard Method, this assessment is carried out on the basis that the standard method figure of 797 dwellings per annum will apply.
- 2.41 As noted in Paragraph 012 of the PPG³⁸ this approach provides an annual figure which can be applied to a whole plan period. The NPPF requires strategic plans to identify a supply of sites for 15 years so a local need figure of 11,955 (797x15) is used as the basis for this assessment³⁹.
- 2.42 As Paragraph 017⁴⁰ of the PPG notes 'the standard method for assessing housing need does not break down the overall figure into different types of housing. Therefore, the need for particular sizes, types and tenures of homes as well as the housing needs of particular groups should be considered separately.' Chapter 4 of this report presents the disaggregation of this local housing need figure so that this requirement can be addressed.

⁴⁰ Reference ID: 2a-017-20190220



³⁷ Paragraph 008 Reference ID: 2a-008-20190220

³⁸ Reference ID: 2a-012-20190220

³⁹ The Local Plan for Dartford will run from 2019 to 2036 so for the plan-period modelling presented in Chapters 4 and 5 of the report a 17 year period is used.

The cost and affordability of housing

Introduction

3.1 An effective housing needs assessment is founded on a thorough understanding of local housing – what it costs and how this varies. This chapter initially considers the cost of market housing in Dartford in a regional and national context. Subsequently, it assesses the entry-level costs of housing across the Borough. A comparison of the cost of different tenures will be used to identify the housing market gaps that exist. Finally, the chapter will report changes in affordability as well as the affordability of housing for different groups of the population currently.

Relative prices

- 3.2 The table below shows the average property price by dwelling type in 2018 in Dartford, the South East region and England as a whole as presented by the Land Registry⁴¹. The data indicates that whilst the overall average property price in Dartford is 8.5% higher than the national figure, it is 13.1% lower than the figure for the South East. The data also shows that houses in the Borough are typically slightly more expensive than their regional equivalent and markedly more expensive than the national average, however flats in Dartford are typically cheaper than both the regional and national figures.
- 3.3 The dwelling profile is not the same across the three areas (with Dartford having a greater proportion of sales of flats and a notably smaller proportion of detached sales than nationally), so a mix adjusted average has therefore been derived to work out what the average price would be were the dwelling mix in Dartford and the South East to be the same profile as is recorded across England. The mix adjusted average price indicates that equivalent properties in Dartford are around 24.3% higher than those found nationally and 0.7% lower than those across the South East as a whole.

 $^{^{41}\,\}underline{\text{http://landregistry.data.gov.uk/app/standard-reports/report-design?utf8=\%E2\%9C\%93\&report=avgPrice}$



Table 3.1 Average property prices 2018						
	Dartford		South East		England	
Dwelling type	Average price	% of sales	Average price	% of sales	Average price	% of sales
Detached	£559,105	11.2%	£580,470	26.6%	£414,416	25.4%
Semi-detached	£369,068	24.0%	£366,938	26.5%	£259,532	28.8%
Terraced	£318,574	33.8%	£307,888	25.4%	£248,508	27.5%
Flat	£228,301	31.0%	£231,635	21.6%	£303,281	18.3%
Overall average price	£329,633	100.0%	£379,453	100.0%	£303,833	100.0%
Mixed adjusted overall average price	£377,598	-	£380,083	-	£303,833	-

Source: Land Registry, 2019

- 3.4 The average property price in Dartford has risen by 47.2% between 2013 and 2018 compared to an increase of 20.7% nationally and a growth of 32.8% across the region. The number of sales in Dartford over this period has grown by 41.0% compared to a rise of 7.8% in England and a decrease of 2.0% for the South East.
- 3.5 The table below shows the average private rents by dwelling size in 2017-2018 in Dartford, the South East region and England as recorded by the Valuation Office Agency. The data indicates that whilst the overall average rental price in Dartford is 13.7% higher than the national figure, it is 2.4% lower than the figure for the South East. The data also shows that one, two and three bedroom rents in the Borough are more expensive than their regional and national equivalent, however four bedroom rents are notably cheaper than the regional figure. The mix adjusted average rent indicates that equivalent properties in Dartford are around 17.6% higher than those found nationally and 0.7% higher than those in the South East.

Table 3.2 Average private rents in 2017-2018* (price per month)						
	Dar	tford	South East		England	
Dwelling size	No. of sales	Average price	No. of sales	Average price	No. of sales	Average price
One bedroom	180	£755	17,260	£715	87,900	£720
Two bedroom	340	£948	31,580	£912	201,410	£787
Three bedroom	150	£1,177	16,880	£1,125	118,920	£898
Four bedroom	30	£1,586	8,110	£1,926	40,090	£1,582
Overall average rent**	730	£960	80,170	£984	486,310	£844
Mixed adjusted rent	-	£1,028	-	£1,021	-	£874

^{*}Recorded between 1 October 2017 to 30 September 2018 **This figure includes the rents for room and studio accommodation which are not presented in this table. Source: Valuation Office Agency, 2019



3.6 The average rents in Dartford have risen by 28.2% between 2012-13 and 2017-18 compared to an increase of 16.6% nationally and a growth of 15.9% across the region. The number of lettings in Dartford over this period has grown by 9.3% compared to a rise of 4.1% in England and a decrease of 5.0% for the South East.

The cost of housing

3.7 To fully understand the affordability of housing within an area, it is necessary to collect data on the cost of housing by number of bedrooms. This ensures that it is possible to assess the ability of households to afford market housing of the size required by that particular household. No published secondary data contains this information at a Local Authority level. As part of this study we have therefore undertaken a price survey to assess the current cost of market (owner-occupied and private rented) and affordable housing in Dartford. At the time of the price survey there were over 750 homes advertised for sale and over 200 properties available to rent in Dartford providing a suitably large sample size for this process. The figure below shows the variations in the cost of housing across the Borough and illustrates that there is some variation, with prices generally slightly cheaper around Dartford town, and the most expensive areas being the south east and south west corners of the Borough. These higher value areas feature larger accommodation and lower density neighbourhoods.

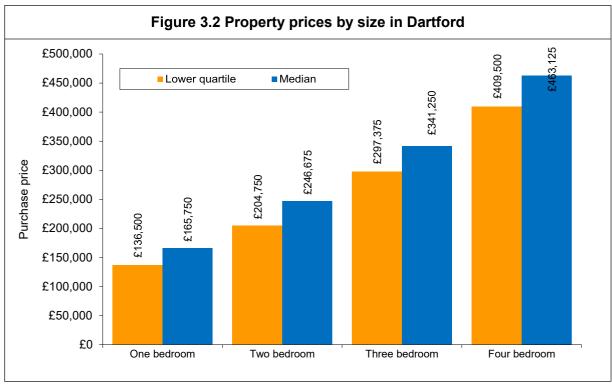
Figure 3.1 Variation in property prices across Dartford – Median property prices by ward Jan 2018 to April 2019

| Median All Sales | Median All S



Source: Land Registry, 2019

- 3.8 Median asking prices by number of bedrooms were obtained in Dartford via an online search of properties advertised for sale during May 2019. The results of this online price survey are presented in the figure below. The prices recorded include a discount to reflect that the full asking price is not usually achieved (with sales values typically 2.5% lower). In terms of market availability, the analysis showed that two bedroom properties are most commonly available to purchase in Dartford, with three bedroom homes the next most widely available. The smallest supply is of one bedroom homes.
- 3.9 The online survey also collected information at different points of the price distribution. Entry-level property prices for each price market are also presented in the figure below. In accordance with the PPG, entry-level prices are based on lower quartile prices (paragraph 021 Reference ID: 2a-021-20190220). This lower quartile price reflects the cost of a home in suitable condition for habitation, some of the properties available in the lowest quartile are sub-standard and will require modernisation and updating which will add further expense to the purchase price. The figure indicates that entry-level prices in Dartford range from £136,500 for a one bedroom home, up to £409,500 for a four bedroom property.



Source: Online estate agents survey May 2019

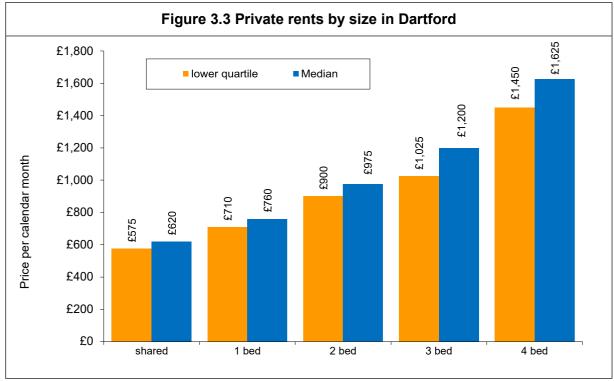
Private rents

3.10 Whilst private rent levels vary across the Borough, the distinction between the areas is less marked than with owner-occupation, reflecting that location is not as important a determinant in rent levels as the condition and quality of the property. The median price for private rented accommodation by property size is presented in the figure below. The costs recorded are the agreed letting cost rather than the advertised cost, although generally there is little distinction



between the two, especially for smaller properties where the demand is high relative to supply. The figure also includes the cost of a shared room within the private rented sector⁴².

3.11 The profile of properties available is somewhat different to that for purchase with a greater proportion of one and two bedroom homes available to rent in the Borough. Entry-level private rents for Dartford are also presented in the figure below. The figure indicates that entry-level rents range from £710 per month for a one bedroom home, up to £1,450 per month for a four bedroom property.



* Shared room is a room in a shared dwelling. Source: Online estate agents survey May 2019

Social Rents

3.12 The cost of Social Rented accommodation by dwelling size in Dartford can be obtained from the Regulator of Social Housing's⁴³ Statistical Data Return dataset for the Registered Social Landlord (RSL) sector and from the Local Authority Housing Statistics data return for the council sector. The table below illustrates the cost of Social Rented dwellings in Dartford. The

⁴³ https://www.gov.uk/government/news/regulator-publishes-statistical-data-return-2017-to-2018



⁴² The Local Housing Allowance regulations, which indicates that single people 35 or under are only entitled to the shared accommodation rate rather than the rate for a one bedroom home, imply that these individuals are deemed suitable to meet their housing needs within the market in this way. The cost of a room within shared accommodation is therefore included as it represents appropriate accommodation for single person households of 35 or under and this group of households will be tested against its ability to afford this in the affordable housing needs model set out in Chapter 5.

costs are significantly below those for private rented housing, particularly for larger homes, indicating a significant gap between the Social Rented and market sectors.

Table 3.3 Average Social Rented costs (per month (includes service charges)					
Bedrooms	Council owned	RSL owned	Overall average cost		
One bedroom	£378	£395	£379		
Two bedrooms	£391	£459	£409		
Three bedrooms	£445	£515	£457		
Four bedrooms	£481	£574	£510		

Source: HCA's Statistical Data Return 2018, Council LAHS 2018

Affordable Rent

- 3.13 Affordable Rent is a relatively new product that has been introduced to reduce the requirement for capital subsidy for affordable accommodation. It is within the definition of affordable housing in the NPPF and is intended to house households on the Housing Register. It is not an intermediate product, but affordable housing for rent that coexists with the existing Social Rent tenure. Whilst there remain long-standing tenancies on Social Rent, the majority of new rented affordable accommodation in Dartford is Affordable Rent; both re-lets from the existing stock and new Affordable Rented accommodation added to the stock. Due to its different cost level, detail will be presented on its relative affordability in comparison with Social Rent where this is possible (in Chapter 5).
- 3.14 Affordable Rents can be set at up to 80% of open market rents, implying there is flexibility as to what they may cost. The table below details the Affordable Rent levels charged in Dartford. A comparison with median market rents indicates that Affordable Rent levels are around 65% to 70% of median market rents.

Table 3.4 Average Affordable Rented costs (per month (includes service charges)					
Bedrooms	Council owned	RSL owned	Overall average cost		
One bedroom	£535	£527	£527		
Two bedrooms	£647	£660	£659		
Three bedrooms	£745	£794	£787		
Four bedrooms	-	£1,129	£1,129		

Source: HCA's Statistical Data Return 2018, Council LAHS 2018

Analysis of housing market 'gaps'

3.15 Housing market gaps analysis has been developed to allow comparison of the costs of different tenures. The figure below shows the housing ladder that exists for different sizes of property. The housing ladder is illustrated by comparing the different types of housing in terms

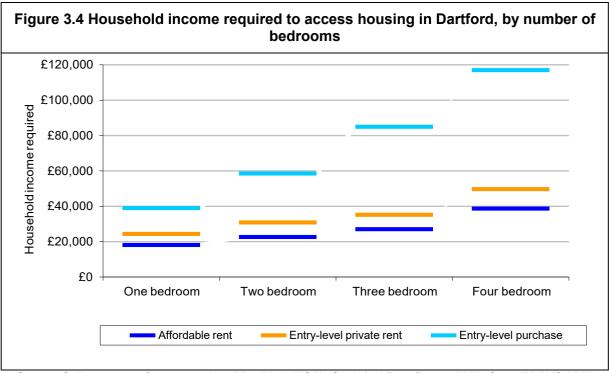


of the income required to afford them. To do this, we have divided the entry-level property price (set out in Figure 3.2) by 3.5^{44} to get an annual income figure (to reflect the likely minimum income required to be granted a mortgage on the property) and multiplied the annual rent by 2.857 to produce a comparable figure. This latter step was carried out for both Affordable Rents (set out in Table 3.4) and market rents (set out in Figure 3.3). These approaches assume a household spends no more than 35% (1/35 = 2.857) of gross household income on rent – this assumption is used to enable a comparison of the different housing costs, however the appropriate affordability threshold within Dartford was discussed in more detail at the stakeholder consultation event (see Appendix 1).

3.16 The figure shows a comparison of the indicative income requirements per household for different types of housing. Measurement of the size of the gaps between these 'rungs of the ladder' helps assess the feasibility of households moving between the tenures - the smaller the gaps, the easier it is for a household to ascend the ladder.

⁴⁴ The multiple of 3.5 for owner-occupation was established in the Strategic Housing Market Assessments Practice Guidance https://www.gov.uk/government/publications/strategic-housing-market-assessments-practice-guidance (page 42). The most recent data available from the Bank of England suggests that this multiple still applies. (<a href="https://www.bankofengland.co.uk/-/media/boe/files/statistics/mortgage-lenders-and-administrators/mlar-longrundetailed.xlsx?la=en&hash=C19A1AC6C462416B0DA71926A744233793B8049B (table 1.31)). This data indicates that of all residential loans to individuals (both regulated and non-regulated) given in England in 2018 to both joint and single applicants, 3.5 is the median income multiple used (49.2% of loans had used a multiple greater than 3.5 and 50.8% used a multiple lower than 3.5. The mortgages recorded as having an 'other' multiple have been excluded from this calculation) For modelling purposes, it is presumed there is no requirement for a deposit as there is no local level data available on household savings and capital levels to enable this analysis.





Source: Online survey of property prices May 2019; HCA's Statistical Data Return 2018, Council LAHS 2018

- 3.17 The figures above indicate that for all dwelling sizes in the Council area, the gap between Affordable Rent and market rent is smaller than the gap between market rent and entry-level home ownership. The gaps for four bedroom accommodation are large; in Dartford an additional £11,000 per year is required to access a four bedroom private rented home over the cost of a four bedroom Affordable Rented property, with a further £67,300 in household income required to move to an owner-occupied home.
- 3.18 The table shows the size of the gaps for each dwelling size in Dartford. The table indicates, for example, that three bedroom market entry rents in the Borough are 30.2% higher (in terms of income required) than the cost of Affordable Rented. The notable gap recorded between Affordable Rents and market entry rents for most dwelling sizes indicates that intermediate housing could potentially be useful for many households. The very large gap between market entry rents and market entry purchase in all cases indicates notable potential demand for partownership products for households in this gap.

Table 3.5 Scale of key housing market gaps					
Property size	Affordable Rent <entry-level rent<="" th=""><th>Entry-level rent<entry-level purchase<="" th=""></entry-level></th></entry-level>	Entry-level rent <entry-level purchase<="" th=""></entry-level>			
One bedroom	34.7%	60.2%			
Two bedrooms	36.6%	89.6%			
Three bedrooms	30.2%	141.8%			
Four bedrooms	28.5%	135.3%			

Source: Online survey of property prices May 2019; HCA's Statistical Data Return 2018, Council LAHS 2018



Intermediate products

3.19 A range of intermediate options are potentially available for households in Dartford, the costs of these are profiled below.

Intermediate Rent/Rent-to-Buy

- 3.20 Rent-to-Buy is a route to home ownership where homes are let to working households at an Intermediate Rent (i.e. less than the full market rent) to give them the opportunity to save for a deposit to buy their first home. It is planned that by landlords (who are often RSLs) providing a discounted rent for tenants for a minimum of 5 years, they will have sufficient time to acquire a deposit so that they may purchase the home. It is set out that the Intermediate Rent must not exceed 80% of the current market rent (inclusive of service charge), however the product is distinct from Affordable Rent which is available with a range of tenancy options and was made available to tenants on the same basis as Social Rent.
- 3.21 It has not been possible to ascertain the availability of this product in the market currently, however its potential suitability for households can be tested by modelling its theoretical cost. The table below sets out the costs of intermediate rent in Dartford, presuming that the rent is set as 80% of median market rents. The table shows that in all instances intermediate rent is cheaper than market entry rent and can be considered an affordable product. In all cases, it is also more expensive than the Affordable Rent currently charged within Dartford. As in all instances Intermediate Rent is more expensive than Affordable Rent (and is therefore serving a separate portion of the housing market), it will be considered for its suitability for meeting those in housing need in Chapter 5.

Table 3.6 Estimated cost of intermediate rent within Dartford (monthly cost)						
Bedrooms	Median private rent	Intermediate Rent	Entry-level private rent	Affordable Rent		
One bedroom	£760	£608	£710	£527		
Two bedrooms	£975	£780	£900	£659		
Three bedrooms	£1,200	£960	£1,025	£787		
Four bedrooms	£1,625	£1,300	£1,450	£1,129		

Source: Online survey of property prices May 2019; HCA's Statistical Data Return 2018, Council LAHS 2018

Shared Ownership

3.22 The table below presents the estimated costs of Shared Ownership housing in Dartford as obtained from the online estate agent survey. The open market values are based on newbuild prices at the time of the survey. The monthly costs of purchasing the property with a 40% equity share and 25% equity share are both presented as these are the most commonly available options. The monthly costs are based on a 30-year repayment mortgage with an



interest rate of 3.79%⁴⁵ paid on the equity share owned and a rent payable at 2.75% on the remaining equity (i.e. the part of the house not purchased).

3.23 The table shows that a 25% equity share Shared Ownership is cheaper than market entry rent in all instances. However, a 40% equity share Shared Ownership is cheaper than market entry for one and two bedroom accommodation for both rent and home ownership whereas for three and four bedroom homes it is more expensive than entry-level market to rent (although it is cheaper than entry-level home ownership).

Starter Homes/ Discount Home Ownership

- 3.24 Discounted Home Ownership is based on selling a home for a proportion of the market value with no residual rent to pay. However, the equity level owned is capped and any future re-sale will be at the same proportion of the agreed price. In Dartford the typical proportion of market value sold is 80%. In 2016 the Government introduced its Starter Homes Initiative whereby the Government is offering concessions for housebuilders who construct new homes specifically to be sold as discount market houses (with a discount of at least 20%) for first-time buyers under 40 years old. Starter Homes are within the definition of affordable homes for within the NPPF (pg 64). The discounted price of these homes should be no more than £250,000 outside London. Eligible first-time buyers will also be required to have a mortgage in order to ensure cash buyers aren't able to speculatively acquire this product. There will also be a minimum 15-year repayment period for a Starter Home. The equity level owned is capped and any future re-sale will be at the same proportion of the agreed price.
- 3.25 As it is not possible to separate the potential market for this product from just those aged under 40 and to identify households suitable specifically for a Starter Home rather than a broader Discount Home Ownership home, Discounted Home Ownership and Starter Homes equate to the same product for the purposes of this report.
- 3.26 The table below presents the estimated costs of Starter Homes in Dartford. These are based on the same open market values as were used for Shared Ownership. The monthly costs are based on a 30-year repayment mortgage with an interest rate of 3.79% paid on the equity share owned.
- 3.27 Starter Homes with an 80% share are more expensive than Shared Ownership accommodation and entry-level market accommodation (private rent) for two, three and four bedroom dwellings. It is however cheaper than entry-level home ownership for all property sizes. It is also worth noting that the price at which Discounted Home Ownership properties

⁴⁵ This interest rate is available as a five-year fixed product to potential homeowners with a high loan to value ratio currently. It is also a rate with no additional product fee associated with it. Whilst there are lower interest rates available for those with lower loan to value ratios we are principally assessing households looking to purchase a home for the first time who are likely to have higher loan to value ratios. Lower interest rates are available for those choosing a shorter fixed term period, however we feel that the use of a five-year period provides a known cost for households becoming owners for a good amount of time.



would be for sale (at 80% the value of newbuild home ownership) would be under the cap of £250,000 for one and two bedroom homes, but three and four bedroom properties at this level of discount would be over the cap.

Shared equity

- 3.28 Shared equity is a product similar to Shared Ownership that is typically offered by the private sector rather than Registered Providers. Like Shared Ownership, with shared equity a mortgage is offered on the equity owned with rent due on the remaining equity, however unlike Shared Ownership it is not confined to newbuild housing and it can be used to access second-hand housing. In Dartford the typical proportion of the equity sold for a shared equity product is 75%⁴⁶. The monthly costs of purchasing a shared equity property with a 75% equity share are set out in the table below. The monthly costs are based on a 30-year repayment mortgage with an interest rate of 3.79% paid on the equity share owned and a rent payable at 2.75% on the remaining equity. The open market values are however based on the overall median prices at the time of the estate agent survey.
- 3.29 Shared equity accommodation with a 75% equity share is more expensive than entry-level market accommodation (private rent for two to four bedroom homes and owner-occupation for one bedroom properties), Shared Ownership accommodation and Help to Buy/ Starter Homes. It is cheaper than four bedroom entry-level home ownership in Dartford, however it is more expensive than entry-level home ownership for one, two and three bedroom dwellings.

Table 3.7 Estimated cost of intermediate housing in Dartford (monthly cost)							
Bedrooms	Open market value	Shared Ownership – 40% equity	Shared Ownership – 25% equity	Help to Buy/ Starter Homes	Shared equity	Entry-level private rent	Entry-level owner- occupation*
One bedroom	£170,000	£550	£490	£633	£674	£710	£635
Two bedrooms	£245,000	£793	£706	£912	£1,003	£900	£953
Three bedrooms	£330,000	£1,068	£951	£1,229	£1,387	£1,025	£1,384
Four bedrooms	£450,000	£1,457	£1,297	£1,676	£1,882	£1,450	£1,906

^{*}The monthly cost of entry-level owner-occupation presuming a 30-year repayment mortgage with an interest rate of 3.79%. Source: Online estate agents survey, May 2019

Help to Buy Equity Loan

3.30 The Help to Buy: Equity Loan is available to help potential homeowners acquire a new home for a discount. In this scheme the Government lends up to 20% of the cost of a newly built home. The potential homeowner needs to provide a 5% cash deposit and a 75% mortgage to

⁴⁶ This is based on advertisements for shared equity homes available across the Thames Gateway area in Kent – including both the EDC area across Dartford and Gravesham and also the Thames Gateway in Medway.



make up the rest. There is no residual rent to pay and loan fees on the 20% loan do not apply for the first five years after the home is bought. Equity loans are available to first time buyers as well as homeowners looking to move. The home must be newly built and cost no more than £600,000. It is not possible to sublet a home bought with a Help to Buy: Equity Loan or own another property when acquiring a home through this initiative. Help to Buy is a form of financing rather than a specific intermediate housing product. As it is not a type of affordable housing and may only be available as a financing method for another two years, this product's suitability to address the future accommodation requirements in Dartford will not be profiled in detail in this report.

Local Housing Allowance

3.31 Local Housing Allowance (LHA) has been brought in to replace Housing Benefit outside of the Social Rented sector. It is designed to make up the shortfall in people's ability to pay for their housing. Households unable to afford all their rent are entitled to LHA to make up the difference so long as the rent does not exceed the LHA cap for the Broad Rental Market Area (BRMA) in which the claim is made as determined by the Valuation Office Agency. The table below sets out the monthly LHA caps that apply in Dartford, which is covered by the North West Kent BRMA. A comparison with the Affordable Rent levels in Dartford (set out in Table 3.4) indicates that the local Affordable Rents are currently cheaper than the LHA caps for one, two and four bedroom homes in Dartford but the Affordable Rent for a three bedroom home is slightly higher than the LHA cap. A comparison with the entry-level private rents in Dartford (set out in Figure 3.3) suggests that the LHA caps are 20-25% lower than entry-level private rent. This means that households in receipt of the full LHA applicable in the private rented sector are likely to need additional income sources to be able to pay for their rent.

Table 3.8 Local Housing Allowance Cap (per month)			
Bedrooms	North West Kent BRMA		
Shared room	£326		
One bedroom	£557		
Two bedrooms	£703		
Three bedrooms	£779		
Four bedrooms	£1,148		

Source: Valuation Office Agency 2019



Housing costs paid

3.32 The data provided by CACI Paycheck also looks at the typical level of disposable income⁴⁷ of households and the average amount paid on the different housing costs in Dartford. The analysis indicates that the mean net disposable household income in Dartford is £17,565 which compares to an equivalent figure of £19,200 for households across Kent. The mean amount of money spent on the mortgage annually by owner-occupiers (with a mortgage) in Dartford is £9,416, compared to £9,009 across Kent. Private renters in Dartford spend an average of £11,576 on their rent per year which compares to an annual average of £9,796 for households across the County.

Affordability of housing

- 3.33 Assessing the affordability of market housing in an area is crucial to understanding the sustainability of the housing market. As stated in Chapter 2, the affordability ratio is currently 9.67 in Dartford (with a figure over 4 indicating a market adjustment is required). In comparison the affordability ratio in 2018 in the South East was 10.38, whilst the national figure was 8.00. The affordability ratio in Dartford has risen by 40.8% over the last 5 years (it was 6.87 in 2013). In comparison over the same time period the affordability ratio has risen by 25.7% for the South East (from 8.26 in 2013) and by 18.3% nationally (a 2013 base of 6.76).
- 3.34 Local Housing Allowance rates are generally lower than 80% of market rent (the maximum level for affordable housing products) at around 65% of market. For homes to be affordable and accessible by all tenants, including those on full and partial benefits, rents should be capped at the Local Housing Allowance rate as far as possible.

⁴⁷ Income after essential outgoings are deducted. The essential outgoings are tax and National Insurance contributions, food and clothing costs, mortgage and rents, Council Tax, utilities, water and structural insurance, childcare, student loans and pension contributions and travel to work costs.





4. Type and tenure of future housing needed

Introduction

- 4.1 The requirement within paragraph 61 of the NPPF to disaggregate the local housing need figure to 'assess the size, type and tenure of housing needed for different groups in the community' is reiterated in Paragraph 17 of the PPG. This chapter describes the long-term balancing housing markets (LTBHM) model which determines the future demand for housing by size and tenure based on the profile of the population derived within the local housing need calculation (set out in Chapter 2).
- 4.2 There are two stages to this process, the first is to disaggregate the local housing need as derived through the Standard Method to produce a population profile for the Borough at the end of the plan period in 2036. The second process uses secondary data to model the future demand for housing arising from this future population and compare it to the current housing stock so that a profile of new accommodation required can be determined⁴⁸.
- 4.3 The demand modelling is described in more detail subsequently, however this chapter initially presents the process for disaggregating the local housing need. The change in the household composition indicated within these projections drives the size and tenure demand profiles generated by the model.

Disaggregating the local housing need

4.4 In Dartford the Standard Method local housing need of 797 will require the construction of significantly more homes than is implied by the official projections as the affordability adjustment made in the standard method calculation lifts the housing need above the growth of 588 households per year identified in the 2014-based household projections (as described in paragraphs 2.30 to 2.39). If these 797 homes are built the population is likely to be larger than projected. It is necessary to determine the profile of this additional population and disaggregate the total local housing need using the NMSS model⁴⁹ so that appropriate accommodation can be provided for the whole population of Dartford in 2036. The model takes

⁴⁹ The model is detailed in Appendix 2.



⁴⁸ This will include a figure for the amount of affordable accommodation required over the plan period, however this is derived using a different approach and has a different purpose to the equivalent figure in Chapter 5, as described in para 1.11, and the two should not be compared.

as its starting point the 2016-based projections⁵⁰. These projections are then adjusted to make them consistent with the local housing need figure using the following assumptions⁵¹:

- The additional homes required by the LHN above and beyond those suggested by the latest household projections will be filled by additional people moving into the area from the rest of the UK.
- The age and gender profile of those additional migrants will be same as those who have moved into the area recently from the rest of the UK.
- Building additional homes above those suggested by the latest household projections will have no impact on household formation rates and the number of additional migrants needed to fill those homes will be calculated using the 2016based household formation rates.
- The in-migrating residents will be aged-on and have the same propensity to have children, move away from the area and die as other residents of the Borough of the same gender and age. In this way it will be possible to estimate how the additional population (above that suggested by the latest population projections) is likely to develop over time.
- 4.5 The table below sets out the age profile of the population in Dartford in 2036 according to these population projections in comparison to the age profile of the Borough currently. The table suggests that those aged 60 or over are going to constitute a greater section of the population by the end of the plan period those aged 60 or over will rise from 21,382 in 2019 to 31,850 in 2036, an increase of 49.0%. Whilst those aged 60 and over will account for just under a quarter of all people in Dartford in 2036, over a third of people in the Borough at the end of the plan period will be aged under 30.

⁵¹ The difference in demographic profile used under different assumptions are set out in Appendix 2.



⁵⁰ The 2016-based population and household projections are used as a basis as these are the most recent and benefit from the ONS's latest methodology and their most recent data and assumptions on key factors such as fertility and mortality rates and international migration. MHCLG have chosen to revert to the 2014-based projections for the Standard Method simply because they happen to produce a national housing need total that is closer to their objective of building 300,000 homes a year, not because they have doubts about the ONS's methodology in the latest projections. In accordance with the PPG we have used the 2014-based projections to determine the local housing need, we are using the 2016-based projections to disaggregate this figure in terms of age and gender profile.

Table 4.1 Age of projected population in Dartford in 2036 compared to current age profile					
Age	2019 Population	2019 Percentage	2036 Population	2036 Percentage	
0-14	22,407	20.5%	26,357	19.0%	
15-29	18,455	16.9%	23,656	17.0%	
30-44	25,151	23.0%	28,263	20.4%	
45-59	22,029	20.1%	28,681	20.7%	
60-75	13,709	12.5%	19,789	14.3%	
75+	7,673	7.0%	12,061	8.7%	
Total	109,424	100.0%	138,807	100.0%	

- 4.6 This population projection is then converted into a household projection by:
 - Removing from the population projection an estimate of those living in communal establishments such as old peoples' homes. This is done using the same assumptions as in the official projections. The resulting population is known as the household population.
 - Household formation rates are then applied to the household population to produce a household projection. The household formation rates are taken from the official 2016based household projections.
- 4.7 The table below sets out the number of households that will be resident in Dartford in 2036 disaggregated by broad household type according to these projections. The 2019 household profile is also presented as a reference point, as 2019 is the base date for this model.

Table 4.2 Projected household population in Dartford in 2036 by household type						
Household type	2019 Number	2019 Percentage	2036 Number	2036 Percentage		
One person	13,383	29.9%	17,888	30.9%		
Couple with no children	9,832	22.0%	11,822	20.4%		
Couple with child/children	13,121	29.3%	15,936	27.5%		
Lone parent	5,381	12.0%	7,329	12.6%		
Other*	3,027	6.8%	5,005	8.6%		
Total	44,745	100.0%	57,980	100.0%		

^{*}Other households include multi-generational households, student households, households of unrelated people sharing accommodation as well as other groups.

4.8 The figure below indicates the change in these household types that will occur between 2019 and 2036 in Dartford. The figure indicates that the number of other households are expected



Figure 4.1 Change in household structure in Dartford, 2019 – 2036 80% 65.3% 60% %age change 2019-2036 36.2% 33 7% 40% 20.2% 21.5% 20% 0% Couple with Other One person Couple with no Lone parent child/children children

to increase the most in Dartford (although from a low base), followed by lone parent and one person households.

Methodology of the demand model

- 4.9 The demand model uses secondary data to determine the future demand for housing by size and tenure as derived from the profile of households resident in the area at the end of the plan-period. It is based on both a detailed understanding of the current stock of housing in the Borough and also the occupation patterns of households in Dartford and how they are changing. It is driven by the changes projected to the composition of the population over the next 17 years as set out above.
- 4.10 The Census provides information on the size (in terms of bedrooms) and tenure of accommodation in Dartford in 2011. This has been adjusted⁵² to reflect the changes since 2011 to provide an accommodation profile in 2019.
- 4.11 The 2011 Census also provides detail on the occupational patterns of different household groups in Dartford, which means that the profile of housing occupied by each household type can be determined. Rather than assuming the current usage patterns for each household type will apply to the future population of that household group, the model assesses the current trends in occupation patterns (recorded by the change in the tenure profile of each household type between the 2001 and 2011 Census in Dartford and adjusted to reflect any more recent behavioural trends recorded nationally in the English Housing Survey, with the changes in the

⁵² Using the latest data from the Regulator of Social Housing's Statistical Data Return and the LAHS datasets and trends indicated within the English Housing Survey and by the Census.



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size of accommodation occupied within each tenure also accounted for), and models their continuation through to 2036. This approach is in line with the PPG.

- 4.12 A further adjustment is made to counter the existence of overcrowding, which the PPG indicates should be addressed. Households currently overcrowded will therefore be housed in adequately sized accommodation within the model⁵³. This means that the future housing stock will better reflect the requirements of the future population in the area.
- 4.13 This profile of suitable accommodation for each household type is applied to the size of the household group in 17 years' time. The accommodation profile required in 2036 is then compared to the current accommodation profile and the nature of additional housing required is derived. It should be noted that the model works by matching dwellings to households so the figures are based on the change in number of households identified within the housing need calculations. However, the housing need calculations presume that the requirement for new dwellings is greater than the projected growth in households. Chapter 7 below will therefore convert the household based results from this chapter into dwelling based equivalents⁵⁴. The following section presents the outputs of this model.

Tenure of housing required

4.14 The tables below show the projected tenure profile in Dartford in 17 years' time. The current tenure is also set out for context. The data shows that in 2036 the housing stock across Dartford should comprise 61.3% owner-occupied accommodation, 22.1% private rented homes, 2.7% Shared Ownership properties and 13.8% Social Rented/Affordable Rented housing.

⁵⁴ The number of homes required per year is converted to a household figure – these new homes are likely to be occupied at the same rate as the existing housing stock so it is necessary to account for the fact that some new homes will be vacant and some will become second homes. The proportion of dwellings currently unoccupied in Dartford is 2.33%. This figure is calculated as the sum of the number of second homes (set out in the Council tax base dataset) and the number of vacant homes (set out in MHCLG live tables), as a proportion of all dwellings in the authority. The figures are calculated over a two-year period between 2014 and 2016 to correspond with the start date of the two most recent sub-national population projections. It is assumed that some 2.33% of the 797 new homes required per year will be vacant. This means that each year 779 households will be housed in new homes in Dartford over the plan period.



⁵³ Using the example of a lone parent household residing in a two bedroom property but requiring a three bedroom home, the modelled accommodation profile for this household group would assign this household a three bedroom property rather than a two bedroom dwelling. This means that it is anticipated that for equivalent households in the future, none would be expected to live in an overcrowded home.

Table 4.3 Current tenure and tenure profile projected in Dartford in 2036						
Tenure	Current te	nure (2019)	Projected tenure (2036)			
Tenure	Number	Percentage	Number	Percentage		
Owner-occupied	27,952	62.5%	35,524	61.3%		
Private rented	9,971	22.3%	12,842	22.1%		
Shared Ownership	766	1.7%	1,587	2.7%		
Social Rent/Affordable Rent	6,056	13.5%	8,027	13.8%		
Total	44,745	100.0%	57,980	100.0%		

4.15 The table below shows the tenure profile required by households resident in Dartford in 17 years' time in comparison to the tenure profile recorded in the Borough currently. The difference between these two distributions is the change required to the housing stock over this period. The results show that 57.2% of new housing in Dartford should be owner-occupied, 21.7% private rented, 6.2% should be Shared Ownership and 14.9% Social Rent/Affordable Rent⁵⁵.

Table 4.4 Tenure of new accommodation required in Dartford over the next 17 years						
Tenure	Current tenure profile (2019)	Tenure profile 2036	Change required	% of change required		
Owner-occupied	27,952	35,524	7,572	57.2%		
Private rent	9,971	12,842	2,870	21.7%		
Shared Ownership	766	1,587	821	6.2%		
Social Rent/Affordable Rent	6,056	8,027	1,971	14.9%		
Total	44,745	57,980	13,235	100.0%		

4.16 The model is also able to provide detail on the size of new housing required within each tenure, as is set out in the section below.

⁵⁵ This is tenure of new housing the Council should plan to deliver (as opposed to the affordable housing estimate in the following chapter), as discussed in Chapter 7.



Discount Home Ownership/Starter Homes

- 4.17 The analysis of the likely cost profile of Discount Home Ownership/Starter Homes in Dartford, set out in Chapter 3, concludes that this product is most likely to be suitable for households that would otherwise reside in the private rented sector. It is a product that has only recently been introduced into the market and therefore cannot be modelled using the same trend data as is utilised for the rest of the LTBHM model. However, the potential demand for this new product over the plan period can be derived by making assumptions about the likelihood of different household groups within the private rented sector to try and acquire this form of housing informed by an affordability analysis of the tenure⁵⁶.
- 4.18 This approach identifies that between 2014 and 2036 there would be a potential demand for 681 Discount Home Ownership dwellings in Dartford, which would represent 5.1% of all new housing over this period. These figures are therefore deducted from the total requirement for private rented accommodation (where the LTBHM model presumes they would otherwise be housed). The demand for 681 Discount Home Ownership dwellings in Dartford identified using this process should be treated as an indicative figure rather than an absolute target.

Size of housing required within each tenure

4.19 The tables below present the size of owner-occupied accommodation required in Dartford in 17 years' time in comparison to the size profile recorded in the sector currently. The implied change to the housing stock is also presented. The data shows that some 36.6% of new owner-occupied housing in Dartford should be three bedroom homes, with 25.8% being two bedroom units, 25.0% should have four or more bedrooms and 12.5% one bedroom accommodation.

⁵⁶ To try and establish the potential demand for this product over the plan period, the household income distribution differentiated by household type has been adjusted to reflect that nationally the income of private rented households is 90.8% of the figure for all households (according to the English Housing Survey). Applying this affordability profile to the flow of households moving to a private rented home each year allows the number of these households that could afford Discounted Home Ownership to be modelled.



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Table 4.5 Size of new owner-occupied accommodation required in Dartford over the next 17 years								
Size of home Current size profile 2036 Change required % of change required								
One bedroom	1,646	2,592	946	12.5%				
Two bedroom	6,758	8,715	1,957	25.8%				
Three bedroom	13,425 16,199 2,774							
Four or more bedrooms	6,123 8,018 1,895 25.0							
Total	27,952	35,524	7,572	100.0%				

4.20 This analysis can be repeated for private rented housing and is presented in the table below. The data indicates that of the 2,870 private rented homes required within Dartford, 30.4% should be three bedroom properties with a further 29.1% two bedroom homes. Some 13.3% should be single bedroom accommodation and 27.3% should have four or more bedrooms.

Table 4.6 Size of new private rented accommodation required in Dartford over the next 17 years								
Size of home Current size profile Size profile Change required % of change required								
One bedroom	2,664	3,045	380	13.3%				
Two bedroom	4,609	5,444	835	29.1%				
Three bedroom	2,170 3,041 871 30.4%							
Four or more bedrooms	poms 528 1,312 784 27.3%							
Total	9,971	12,842	2,870	100.0%				

4.21 The table below sets out the equivalent analysis for Shared Ownership housing. The data indicates that of the 821 Shared Ownership dwellings required within Dartford, 30.7% should be three bedroom properties with a further 27.7% two bedroom accommodation. Some 26.4% should have one bedroom and 15.2% should have four or more bedrooms.

Table 4.7 Size of new Shared Ownership accommodation required in Dartford over the next 17 years								
Size of home Current size profile Size profile Change required % of change required								
One bedroom	156	372	216	26.4%				
Two bedroom	239	467	228	27.7%				
Three bedroom	278	530	252	30.7%				
Four or more bedrooms	93	218	125	15.2%				
Total	766	1,587	821	100.0%				



4.22 The table below shows the size of accommodation required in the Affordable Rented/Social Rented sector. The table shows that of the 1,971 additional Affordable Rented units required within Dartford over the next 17 years, 29.2% should have four bedrooms, 25.0% three bedrooms, 25.0% one bedroom and 20.8% two bedrooms.

Table 4.8 Size of new Social Rent/Affordable Rent required in Dartford over the next 17 years								
Size of home Current size profile Change required % of change required								
One bedroom	1,960	2,454	494	25.0%				
Two bedroom	1,998	2,408	410	20.8%				
Three bedroom 2,008 2,501 493 25.0%								
Four or more bedrooms	90	665	575	29.2%				
Total	6,056	8,027	1,971	100.0%				

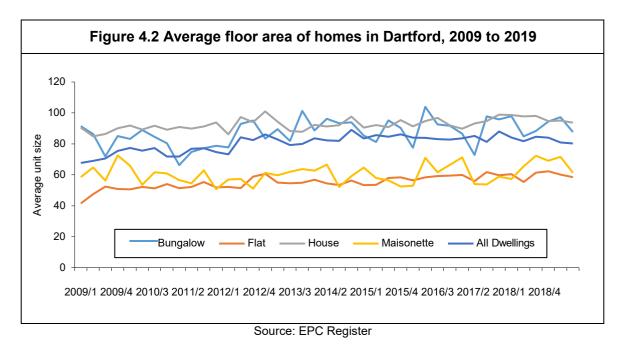
4.23 The table below shows the size of Discount Home Ownership / Starter Homes that would potentially be required should this product become available to house some households that would otherwise reside in the private rented sector. The residual private rented requirement, once the potential demand from households for this alternative product has been deducted, is also set out in the table. The model indicates that in Dartford, 30.6% of the Discount Home Ownership units should have two bedrooms, 30.2% three bedrooms, 22.3% one bedroom and 16.9% four bedrooms.

Table 4.9 Potential demand for Discount Home Ownership / Starter Homes in Dartford over the next 17 years by size							
Size of home		ne Ownership / · Homes	Residual private rented homes				
Size of florite	Number required	Proportion required	Number required	Proportion required			
One bedroom	152	22.3%	229	10.4%			
Two bedroom	208	30.6%	627 28.6%				
Three bedroom	206	30.2%	665 30.4%				
Four or more bedrooms	115	16.9%	668 30.5%				
Total	681	100.0%	2,189	100.0%			



Space Standards

- 4.24 The Nationally Described Space Standards (which set out national minimum space standards) published by the Department for Communities and Local Government in 2015⁵⁷ detail the minimum gross internal floor areas required in new dwellings and also the size of storage area required. These vary by the number of storeys in the home, as well as the number of bedrooms and bedspaces the dwelling is providing.
- 4.25 The main source of information on the floor size of dwellings comes from EPC certificates,⁵⁸ however this source does not collect information on the number of bedrooms in the dwelling. The data below shows the average unit size in Dartford in m² by property type. This indicates that, over the last five years, average dwellings in the Borough are getting slightly larger.



4.26 The Council's 2017-18 Annual Monitoring Report notes that 'when compared against the National Space Standards, these figures show the average flat meets criteria for a flat for 3 people (2 bedrooms). Additionally, the average house meets criteria for a 2 storey house for 6 people (4 bedrooms). This would include some dwellings permitted before the Standards were introduced in Dartford under policy DP8. Policy DP8 looks at residential space and design in new developments. Of the 301 dwellings approved in 2017/18 in the non-EDC area for detailed planning, all but three dwellings were to national space standards. The three narrowly missing the standards were for conversions, one being in a listed building..... In the

https://www.gov.uk/government/statistical-data-sets/live-tables-on-energy-performance-of-buildings-certificates#epcs-for-all-properties-non-domestic-and-domestic



https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/16051
9 Nationally Described Space Standard____Final Web_version.pdf

- EDC area, there were 569 homes granted detailed consent, with all of them being to the nationally described space standards.' (paragraphs 5.32 to 5.34).
- 4.27 The requirement for new homes to meet the national space standards, introduced in 2017, has not reduced the delivery of housing in Dartford, indicating that they are not an impediment to the housing delivery. There is a case for continuing to apply the Nationally Described Space Standards in Dartford.





5. Affordable housing need

Introduction

- 5.1 It is necessary to undertake a separate calculation of affordable housing need (the previous model has a limited capacity to assess resident households' ability to afford appropriate local housing). Paragraph 18 (Reference ID: 2a-018-20190220) to Paragraph 24 (Reference ID: 2a-024-20190220) of the PPG details how affordable housing need should be calculated. The affordable housing need figure is calculated in isolation from the rest of the housing market and is used solely to indicate whether the Local Planning Authority should plan for more dwellings where it could help meet the need for affordable housing.
- The model outlined in the PPG is an assessment of the housing market at a particular point of time (June 2019) and does not consider likely future changes to the housing market that may impact the results (such as future loss of affordable stock through Right to Buy), i.e. it is based in what is known at the time of the assessment. The PPG (Paragraph 19) defines affordable housing need as 'the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market'.
- 5.3 Appendix 3 presents the results of the three broad stages of the model used to calculate affordable housing need. This chapter sets out the overall annual estimate of the affordable housing need in Dartford⁵⁹ as a consequence of following the steps detailed in the appendix and the tenure and size of accommodation most appropriate to meet this need is discussed.

Estimate of net annual affordable housing need

- Once all of the steps of the calculation of the affordable housing needs model (detailed in Appendix 3) have been completed it is necessary to bring this evidence together to determine the overall net annual affordable housing need. This is set out below.
- 5.5 The PPG states that the figures in the model need to be converted to annual flows to establish the total need for affordable housing (Paragraph: 024 Reference ID: 2a-024-20190220). The first step in this process is to calculate the total net current need. This is derived by subtracting the estimated current affordable housing supply (Stage 3) from the current unmet gross need for affordable housing (Stage 1).
- 5.6 The second step is to convert this total net current need figure into an annual flow. The PPG indicates that annual flows should be based on the plan period. For the purposes of this study the period of 17 years will be used to fit in with the remaining timeframe of the Local Plan

⁵⁹ This will imply a figure for the amount of affordable accommodation required over the plan period, however this is derived using a different approach and has a different purpose to the equivalent figure in Chapter 4, as described in para 1.4, and the two should not be compared.



(through to 2036). The final step is to sum the annualised net current need with the total newly arising affordable housing need (Stage 2) and subtract the future annual supply of affordable housing (Stage 4). The table below sets out this process. It leads to a total need for affordable housing of 263 per year in Dartford. In accordance with paragraph 024 of the PPG this figure should be compared with the local housing need identified following the Standard Method to determine whether an uplift to the local housing need is required. This is discussed in Chapter 7.

Table 5.1 Results of the affordable housing needs model in Dartford				
Stage in calculation				
Stage 1: Current unmet gross need for affordable housing (Total) (Table A5.3)	1,372			
Stage 2: Newly arising affordable housing need (Annual) (Table A5.5)	662			
Stage 3: Current affordable housing supply (Total) (Table A5.6)	1,661			
Stage 4: Future housing supply (Annual) (Table A5.8)	382			
Stage 5.1 Net current need (Stage 1 - Stage 3) (Total)	-289			
Stage 5.2 Annualise net current need (Stage 5.1/17) (Annual)	-17			
Stage 5.3 Total need for affordable housing (Stage 2+ Stage 5.2 – Stage 4) (Annual)	263			
Total gross annual need (Stage 1/17 + Stage 2) (Annual)	743			
Total gross annual supply (Stage 3/17 + Stage 4) (Annual)	480			

Overall households in affordable housing need by type (gross)

5.7 The table below gives a breakdown of the gross annual households in need, by household type in Dartford. The table shows that some 4.6% of lone parent households are in housing need compared to 1.0% of couple households with no children. Overall, lone parent households comprise a third of all households in need.

Table 5.2 Annual need requirement by household type in Dartford							
		N	eed requireme	ent			
Household type	No. of h'holds in need h'holds in need (gross) Not in need h'holds in need h'holds need need h'holds need need need						
One person	152	13,231	13,383	1.1%	20.4%		
Couple with no children	94	9,738	9,832	1.0%	12.6%		
Couple with child/children	163	12,959	13,121	1.2%	21.9%		
Lone parent	247	5,134	5,381	4.6%	33.3%		
Other	87	2,940	3,027	2.9%	11.8%		
Total	743	44,002	44,745	1.7%	100.0%		



Size of accommodation required

- 5.8 The table below shows the size of accommodation required by households in housing need in Dartford. The supply distribution for affordable homes is derived from average profile of relets of affordable accommodation over the last three years. The last column in the table presents the supply as a percentage of need. This is calculated by dividing the estimated supply of the property size by the derived need for that property size. The lower the figure produced, the more acute the need for affordable accommodation in the area, as the current supply is unlikely to meet the identified need.
- 5.9 The table suggests that there is a net need for all sizes of affordable accommodation in Dartford and the largest net need is for two and four bedroom homes, followed by three bedroom accommodation. The final column shows that the need relative to supply is the greatest for four bedroom homes. Households in need requiring one bedroom accommodation are most likely to have their need met from the current supply.

Table 5.3 Size of additional units required to meet affordable housing need in Dartford								
	Need requirement							
Size of home	Gross Gross Net annual As a % of Supply as annual need total net % of gross annual need need							
One bedroom	246	229	17	6.6%	92.9%			
Two bedrooms	266	177	89	33.7%	66.7%			
Three bedrooms	134	65	69	26.1%	48.6%			
Four or more bedrooms	97	97 9 88 33.6% 9.2%						
Total	743	480	263	100.0%	64.6%			

Type of affordable home required

5.10 As discussed in Chapter 3, a range of affordable products is available to meet affordable housing need in Dartford. This section will consider the suitability of these different products for meeting affordable housing need.

Gross requirement

5.11 As the relative cost of each product is not always the same (for example in some instances Shared Ownership housing with a 25% equity share is more expensive than Intermediate Rent, but in other cases the reverse is true) each product is tested individually. The table below illustrates how many households in affordable housing need in Dartford are able to afford the different affordable products. Several intermediate options are affordable to some households, so the table presents the maximum number of households able to afford each product. Households can therefore be included in more than one row. The only exception is the final



row which includes only households unable to afford a product more expensive than Social Rent. The Social Rented group also includes those unable to afford any accommodation without support from HB/LHA, as this is the tenure in which these households are most likely to reside.

5.12 The table shows that of the 743 households in gross need each year in Dartford, 13.2% could afford Shared Ownership with a 40% share, 26.9% could afford Shared Ownership with a 25% share, 13.6% could afford Intermediate Rent and 34.9% could afford Affordable Rent. Overall some 62.4% of households in affordable housing need can only afford Social Rent or require support. These figures are based on the products being available at the costs set out in Chapter 3.

Table 5.4 Size and type of affordable home required by those in need (per annum) in Dartford						
Product	One bed	Two bed	Three bed	Four bed	Total	Total (%)
Shared Ownership – 40% equity share	50	48	-	-	98	13.2%
Shared Ownership – 25% equity share	84	87	14	15	200	26.9%
Intermediate Rent	17	54	13	17	101	13.6%
Affordable Rent	64	108	51	36	259	34.9%
Social Rent/requires assistance	162	158	83	61	464	62.4%
All households	246	266	134	97	743	100.0%

Sensitivity analysis - affordability threshold

- 5.13 The results presented in this chapter are based on using an affordability test where the cost of housing can constitute up to 35% of gross income and still be affordable in Dartford (the evidence that this is the suitable baseline is set out in Appendix 4). The impact of adjusting this affordability threshold is considered in the tables below, which details the results of the PPG affordable housing need model across Dartford where the cost of housing could constitute no more than 25% of gross household income and 30% of gross household income as well as 35% of gross household income. In paragraph 020 of the PPG it is noted that households should be considered against their ability to afford owner-occupation, where that is their aspiration. Unfortunately, the data sources do not collect information on the tenure that the households in need aspire to. To gauge the impact of presuming all households aspire to owner occupation, the final column in the table shows the results of the affordable housing need model if households were tested for their ability to afford market entry owner-occupation rather than market rents.
- 5.14 The first table indicates that the net requirement would increase from 263 to 388 affordable homes per year in Dartford if 30% of gross household income could be spent on housing costs.



This would increase further to 521 affordable homes per year if 25% of income could be spent on housing costs. If it was presumed that home ownership was the marketaccess point, then there would be a need for 382 affordable homes per year.

Table 5.5 Impact of different affordability assumptions on affordable housing requirement in Dartford							
	Rent payal	Market entry is					
	Affordability threshold: 35% of gross household income	30% of gross household income	25% of gross household income	based on owner- occupation			
Stage 1: Current gross need	1,372	1,619	1,866	1,742			
Stage 2: Newly arising need	662	775	894	761			
Stage 3: Current supply	1,661	1,691	1,701	1,697			
Stage 4: Future supply	382	382	382	382			
Stage 5.1 Net current need	-289	-72	165	45			
Stage 5.2 Annual net current need	-17	-4	10	3			
Stage 5.3 Total annual need	263	388	521	382			





6. Requirements of specific groups of the population

Introduction

6.1 Paragraph 59 of the NPPF seeks that '... that the needs of groups with specific housing requirements are addressed ...', and then paragraph 61 requires:

... 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, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).

- This chapter considers the specific profiles of the specific groups of the population. For each group the analysis will present the relative prevalence of the population, the current accommodation situation and information on their future requirements. As stated in Paragraph: 001 (Reference I D: 67-001-20190722) of the PPG 'Strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area.' Whilst the LTBHM model (set out in Chapter 4 above) considers all household groups within the model, the results can be broken down to show the accommodation requirements of certain household groups of interest. It should be noted that during the drafting of this report the PPG on housing needs assessments was divided into three different elements; 'housing and economic needs assessments', 'housing needs of different groups' and 'housing needs of older and disabled people'. This chapter will contain information that meets the requirements within each of these.
- 6.3 The chapter looks at the following groups of the population which all have an appreciable impact on the housing market in Dartford:
 - Older persons
 - People with disabilities
 - Family households
 - Essential local workers
 - Younger people
- 6.4 This chapter will also examine the private rented sector in more detail and comment on the level of demand from people wishing to build their own homes. Student housing and the service families are not profiled in detail in this report as Dartford contains no higher education establishments nor Ministry of Defence bases.

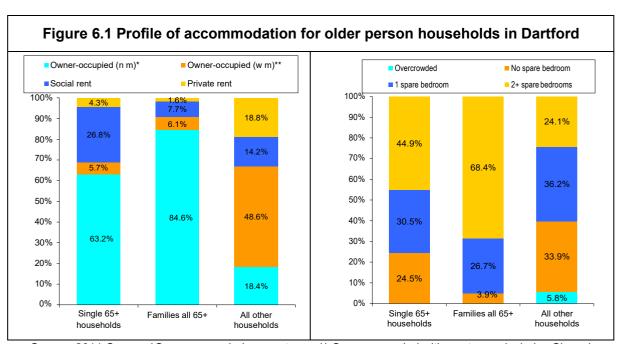


Housing Needs of Older People

6.5 Paragraph: 001 (Reference ID: 63-001-20190626) of the PPG recognises that 'the need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing.... Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.' Page 69 of the NPPF provides the following definition of older people: 'People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.' The analysis of older people presented here will be focused on people aged 65 and over.

Current situation

The Census provides detail on the housing situation of older persons at a local level. It is worth noting that in 2011 according to the Census 18.7% of households in Dartford were older person only households (households where all members are 65 or over), compared to 21.9% regionally and 20.7% nationally. Of these older person only households in Dartford in 2011, 57.6% contained only one person, a figure lower than that recorded in the South East region (57.7%) and England (59.6%). The figure below shows the tenure profile of older person only households in Dartford in 2011 compared to the remainder of the household population. The figures also set out the occupancy level of these groups. The results show that both of the older person groups record a higher level of owner-occupation than other households. Older person households were also more likely than average to have multiple spare bedrooms in their home.







Future requirement

- 6.7 The disaggregated local housing need projections (set out in Chapter 4) indicate that the population aged 65 or over is going to increase dramatically in Dartford over the plan period; from 16,121 in 2019 to 24,784 in 2036, a rise of 53.7%. The projections also suggest that there will be an increase in the number of households headed by someone over 65 from 10,185 in 2019 to 15,606 in 2036, an increase of 53.2%. The projections indicate that the proportion of older persons living alone in Dartford will increase from 44.7% in 2019 to 47.3% in 2036.
- 6.8 The results of the LTBHM model can be disaggregated into different household groups within the whole population. The tables below show the projected accommodation profile for older person households in Dartford in 2036 arising from that model.

Table 6.1 Type of accommodation projected for older person only households in Dartford in 2036							
Size of home Owner-occupation Private rented Ownership Social Rent/ Affordable Rented							
One bedroom	1,323	320	200	2,251	4,093		
Two bedrooms	4,081	378	71	300	4,830		
Three bedrooms	4,868	137	14	188	5,208		
Four or more bedrooms 1,438 20 0 17 1,475							
Total	11,710	855	286	2,755	15,606		

In line with the updated PPG that says 'offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems' it will be necessary for the Council to consider how the requirements of these groups could be accommodated in the future. It is anticipated that that the majority of older person households will reside in the general housing stock in Dartford in 2036 (as they do now) so it is important that new housing is suitable for the widest range of groups. There are a range of tools for achieving this, such as following the HAPPI⁶⁰ design principles so it may be suitable for older people (although these design features will appeal more widely across the population), adoption of the Building For Life⁶¹ Standards (these are broad design principles) and adopting



⁶⁰ https://www.housinglin.org.uk/Topics/browse/Design-building/HAPPI/

 $^{^{61}\,}https://www.designcouncil.org.uk/sites/default/files/asset/document/Building\%20 for\%20 Life\%2012_0.pdf$

the Accessible and Adaptable Standards⁶² of construction as set out in the Building Regulations. The Council will need to determine which approach is most suitable for their requirements and this may vary for different sites in the Borough.

Specialist accommodation

- 6.10 Given the dramatic growth in the older population and the higher levels of disability and health problems amongst older people there is likely to be an increased requirement for specialist housing options. It is therefore useful to consider the ability of specialist accommodation to meet the requirements of this group. To do this we have used the modelling produced by the Housing Learning and Improvement Network (Housing LIN) in *Older People's Housing Market Research: Ebbsfleet*⁶³. This used the Housing LIN Strategic Housing for Older People (SHOP) tool, which is the model recommended by the PPG (Paragraph: 004 Reference ID: 63-004-20190626). It should be noted that this tool is only driven by demographic changes and does not consider peoples' choices or aspirations as to what form of accommodation they would prefer.
- 6.11 The model examines the future requirement of two types of specialist housing; housing for older people older people and housing with care 5. Currently there are 485 units of housing for older people in the Borough and 60 units of housing with extra care in Dartford. The current prevalence of housing for older people is 92 per thousand head of population aged 75 in Dartford, whilst the prevalence of housing with care is 11 per thousand head of population aged 75 in the Borough. The SHOP model presumes that, given the significant projected growth in the future population of those aged 75 or over, it is appropriate for authorities to plan to deliver these two types of accommodation at the national prevalence rates in the future, which are 121 units of housing for older people per thousand head of population aged 75 or over, and 15.5 units of housing with care per thousand head of population aged 75 or over.
- 6.12 To establish the potential demand for these accommodation types in Dartford in 2036, these national prevalence rates are applied to the total number of households headed by someone aged 75 or over in 2036 in the Borough according to the disaggregated local housing need projections. The demand that is derived is then compared to the current stock. This process is summarised in the table below. To meet national occupation rates in 2036 the model identifies a requirement for 597 additional specialist units in Dartford, of which 527 units should

⁶⁵: This is defined on page 14 of the report as 'it includes extra care schemes, often called 'assisted living' in the private sector, with 24/7 care available on-site and housing schemes that offer bespoke care services, even if these are not full on-site 24/7 care, across both the social and private sector.'



⁶² See paragraph 63-009-20190626 of the PPG and https://www.gov.uk/guidance/housing-optional-technical-standards.

⁶³ http://www.housinglin.org.uk/

⁶⁴ Defined on page 14 of the report as 'social sector 'sheltered' and age-exclusive housing and private sector leasehold retirement housing. This will include schemes, for rent and for sale, with on-site staff support, those with locality-based support services and schemes with no associated support services'.

be housing for older people and 70 units housing with extra care. These are Class C3 dwellings.

Table 6.2 Projected requirement for specialist accommodation in Dartford over the plan period						
Type of specialist accommodation						
Housing for older people	485	1,012	527			
Housing with extra care	60	130	70			
Total	545	1,142	597			

Source: Older People's Housing Market Research: Ebbsfleet, 2018. Disaggregated local housing need projections.

- 6.13 The requirement for 597 additional specialist units for older people represents 4.5% of the total household growth for the period 2014 to 2036. The actual numbers and type of specialist accommodation needed may depend on changes in patterns of demand and expectations and it is therefore appropriate to consider this level of need with the acknowledgement that the form of accommodation delivered should not be too prescriptive. It should be noted that this requirement for 597 specialist units forms part of the overall local housing need required over the Local Plan period in Dartford any housing released by households moving to new specialist accommodation would become occupied by other households, reducing the need for new non-specialist accommodation.
- 6.14 As well as the need for specialist housing for older people there will also be an additional requirement for Registered Care (nursing and residential care homes). According to the POPPI⁶⁶ modelling there are around 750 spaces in nursing and residential care homes in Dartford currently. The disaggregated local housing need projections indicate that there will be a requirement for Registered Care from 1,299 people in Dartford in 2036, suggesting an additional 359 spaces will be required over the next 17 years.
- 6.15 This additional accommodation is required to meet the future institutional population and therefore does not form part of the new housing to meet the local housing need. (On a practical point, it would not be appropriate to increase the housing requirement to meet this need (as it is not housing) although it may be appropriate to plan for the provision of this need separately).
- 6.16 Before developing a policy around the further provision of institutional accommodation, it will be important for the Council to engage with Kent County Council. The County Council have indicated that reduced funding is causing more registered care homes to close down and that

⁶⁶ https://www.poppi.org.uk/



there are likely to be fewer care home places in the future – but this does not reflect a lack of a need for this provision.

6.17 The majority of older person households in Dartford are likely to remain in general housing, as the Paragraph 012 (ID: 63-012-20190626) of the PPG notes 'Many older people may not want or need specialist accommodation or care and may wish to stay or move to general housing that is already suitable, such as bungalows, or homes which can be adapted to meet a change in their needs.' The next section looks at the role of adaptations to help permit households remain in their home.

People with disabilities

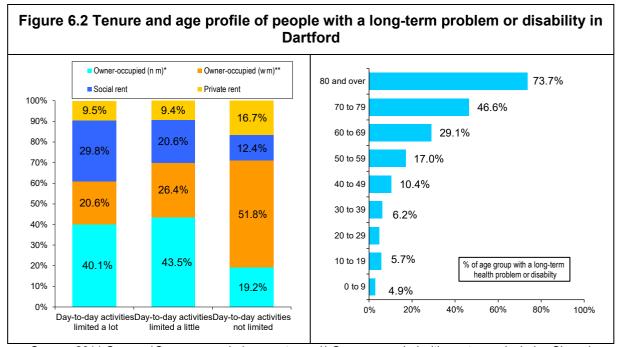
6.18 Paragraph: 002 (Reference ID: 63-002-20190626) of the PPG notes that 'The provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in ensuring that they live safe and independent lives.... Providing suitable housing can enable disabled people to live more independently and safely, with greater choice and control over their lives.' Page 70 of the NPPF provides the following definition of disabled people: 'People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.' Due to a dearth of accurate data on the individual groups within this population this analysis in this section will consider all those with a specific need unless otherwise stated.

Current situation

- As is noted in paragraph 005 (Reference ID: 63-005-20190626) of the PPG, 'Multiple sources of information may need to be considered in relation to disabled people who require adaptations in the home, either now or in the future. The Census provides information on the number of people with a long-term limiting illness.' The figures on the incidence of limiting long-term illness recorded by the Census are therefore used as a starting point. The Census shows that, in 2011, some 15.1% of the resident population in Dartford had a long-term health problem or disability, compared to 15.8% in the South East and 17.9% nationally. Further analysis shows some 44.9% of all residents with a long-term health problem or disability in Dartford had a condition that limited day-to-day activities a lot, with 55.1% having a condition that limited activities a little. In the South East, 43.8% of all residents with a long-term health problem or disability had a condition that limited day-to-day activities a lot and 56.2% had a condition that limited activities a little, with the equivalent figures nationally 47.1% and 52.9% respectively.
- 6.20 The figure below shows the tenure profile of people with a long-term health problem or disability in Dartford in 2011 compared to the remainder of the population. The figure also sets out the prevalence of a long-term health problem or disability in the different age groups of the population. The results show that in Dartford, whilst people with a long-term health problem or disability are more likely than average to be owner-occupiers with no mortgage, they are also



more likely than average to reside in the Social Rented sector. The analysis also reveals a strong correlation between age and a long-term health problem or disability.



Source: 2011 Census *Owner–occupied no mortgage ** Owner-occupied with mortgage, includes Shared Ownership.

Number of people in receipt of relevant benefits

- 6.21 The PPG indicates that a more up-to-date estimate of the number of people with a disability can be acquired by looking at the number of people in an area that are in receipt of Personal Independence Payment (PIP) helps with some of the extra costs caused by long-term disability, ill-health or terminal ill-health. Data from the Department of Work & Pensions indicates that as at April 2019 there were 2,499 people in Dartford in receipt of PIP, which equated to 2.2% of the population in the Borough. In comparison some 2.2% of the population across the South East and 3.1% of the population of England were in receipt of PIP.
- 6.22 Attendance Allowance is a benefit for people over the age of 65 who are so severely disabled, physically or mentally, that they need a great deal of help with personal care or supervision. The Department of Work & Pensions data shows that as at November 2018 there were 1,948 people in Dartford in receipt of Attendance Allowance, which equated to 1.8% of the population in the Borough. In comparison some 2.2% of the population in the South East and 2.4% of the population nationally were in receipt of Attendance Allowance.

⁶⁷ This has replaced Disability Living Allowance.



6.23 The PPG notes that 'whilst these data sources can provide a good indication of the number of disabled people, not all of the people included within these counts will require adaptations in the home.'

Projected health of the future population

- 6.24 The Projecting Older People Information System (POPPI) website⁶⁸ and the parallel Projecting Adult Needs and Service Information (PANSI) website⁶⁹ model the current and likely future incidence of a range of health issues for each authority in England. The table below sets out the number of people estimated to have one of four health conditions currently as determined by these data sources. The table also indicates the number of people projected to have these conditions in 2036 derived by applying the future prevalence rates used by the POPPI and PANSI modelling to the disaggregated future population for Dartford in 2036 identified within the local housing need calculation. The table then goes on to report the current and future population in Dartford that require assistance with activities. These figures are derived using the same approach as described for the health condition modelling. The data from PANSI and POPPI is based on current and recent prevalence rates and whilst these may vary in the future, the figures provide a useful baseline estimate.
- 6.25 The table shows that the number of those aged 65 or over with a limiting long-term illness that limits them a lot is expected to increase by 50.0% between 2019 and 2036 in Dartford. This compares to an increase of 78.4% in the number of people aged 18-64 in Dartford with impaired mobility, a rise of 22.5% in the number of people aged 18-64 in Dartford with a common mental health disorder, an increase of 65.8% in the number of people aged 65 or over with dementia⁷⁰ and an increase of 33.1% in the number of people in Dartford with a moderate or severe learning disability.
- 6.26 The table also shows that the number of those aged 65 or over that are unable to manage at least one mobility activity on their own is expected to increase by 57.6% between 2019 and 2036, compared to an increase of 55.2% in the number of people aged 65 and over who need help with at least one domestic task, an increase of 15.8% in the number of people aged 65 and over who need help with at least one self-care activity and an increase of 26.2% in the number of people aged 18-64 with a serious personal care disability. It should be noted that these changes better reflect the projected change in the demographics of the population (an ageing population) rather than a notable change in the overall health of people.

⁷⁰ Paragraph 019 (Reference ID: 63-019-20190626) of the PPG notes that *'Evidence has shown that good quality housing and sensitively planned environments can have a substantial impact on the quality of life of someone living with dementia. People with dementia need to have access to care and support to enable them to live independently and homes need to be designed with their needs in mind.'*



⁶⁸ https://www.poppi.org.uk/

⁶⁹ https://www.pansi.org.uk/

Table 6.3 Number of people with particular health issues projected over the Local Plan period in Dartford					
Condition	2019	2036	Total change	% change	
н	ealth condition	n			
People aged 65 and over with an illness*	3,478	5,216	1,738	50.0%	
People aged 18-64 with impaired mobility	3,501	6,245	2,744	78.4%	
People aged 18-64 with a common mental health problem	12,758	15,623	2,865	22.5%	
People aged 65 and over with dementia	1,181	1,958	777	65.8%	
People all ages with a learning disability	1,974	2,627	653	33.1%	
People requiri	ng assistance	with activities			
People aged 65 and over that are unable to manage at least one mobility activity on their own**	3,022	4,762	1,740	57.6%	
People aged 65 and over who need help with at least one domestic task***	4,662	7,234	2,572	55.2%	
People aged 65 and over who need help with at least one self-care activity****	4,612	5,341	729	15.8%	
People aged 18-64 with a serious personal care disability*****	565	713	148	26.2%	
All people	109,424	138,807	29,383	26.9%	

*A limiting long-term illness that limits them a lot. **Activities include going out of doors and walking down the road; getting up and down stairs; getting around the house on the level; getting to the toilet; getting in and out of bed. ***These are activities which, while not fundamental to functioning, are important aspects of living independently such as doing routine housework or laundry, shopping for food, doing paperwork or paying bills. ****These are activities relating to personal care and mobility about the home that are basic to daily living. *****Their physical disability means that they require someone else to help from getting in and out of bed, or getting in and out of a chair, dressing, washing, feeding, and use of the toilet. Source: The Projecting Older People Information System and Projecting Adult Needs and Service Information, 2019, disaggregated local housing need figures, 2019.

Accessible and adaptable housing

- 6.27 Paragraph 008 (Reference ID: 63-008-20190626) of the PPG sets out that 'Accessible and adaptable housing enables people to live more independently, while also saving on health and social costs in the future.' The same paragraph then goes onto clarify that 'accessible and adaptable housing will provide safe and convenient approach routes into and out of the home and outside areas, suitable circulation space and suitable bathroom and kitchens within the home. Wheelchair user dwellings include additional features to meet the needs of occupants who use wheelchairs, or allow for adaptations to meet such needs.'
- 6.28 It is possible to model the potential requirement for accessible and adaptable housing using existing national prevalence rates of those with an impaired mobility and then adjusting the



calculations to better reflect the situation in Dartford. The Life Opportunities Survey⁷¹ sets out the prevalence rate for people with an impaired mobility in four broad age categories. These national figures are adjusted to reflect the situation in Dartford by comparing the rate at which people stated that their day to day activities were limited a lot nationally with that recorded in Dartford in the 2011 Census.

- 6.29 This produces a locally adjusted prevalence rate by age. We then apply these rates to the population projection for Dartford derived within the calculation of the local housing need to produce an estimate for the population that has impaired mobility in 2036. We have used information from the 2011 Census for Dartford to determine how many of these individuals are likely to live with another person with this condition (where there is more than one person with impaired mobility in a household the number of individual homes required is then reduced).
- 6.30 If it is assumed that all of the institutional population in 2036⁷² have impaired mobility (and therefore, if they were to stay in their own home, these people will have their requirements for accommodation to meet their mobility requirement addressed in specialist accommodation), then there would be a requirement for 4,480 accessible and adaptable homes in Dartford in 2036 in the general housing stock (8.3% of the total housing stock in 2036). If it is presumed that half of the institutional population have impaired mobility then there would be a requirement for 5,548 accessible and adaptable homes in Dartford in 2036 in the general housing stock, (9.4% of the total housing stock in 2036)
- 6.31 The requirement for adaptable and accessible housing can be estimated utilising the CORE LA Area Lettings Reports in 2017/18 which provides detail about those that have moved into affordable accommodation both general needs and specialist homes. This source records whether households that moved into affordable housing in Dartford over the last year require fully wheelchair accessible housing, whether they require level access housing or whether they have other disability related requirements. Conversely the data also indicates households where there were no disability related housing design or adaptation requirements.
- 6.32 The data source indicates that where this information was collected⁷³, some 17.3% of households required a home with an adaptation to meet their mobility requirement. If this is presumed that this rate was reflective of general demand across the Borough and applied to the new dwelling requirement of 13,549 over the plan period (797 per year between 2019 and 2036), this means that 2,339 of these new homes should be built to accessible and adaptable standard.

⁷³ There were a small number of respondents where this detail is unknown.



⁷¹ https://www.gov.uk/government/collections/life-opportunities-survey

⁷² Modelled within the local housing need calculations.

- 6.33 These two data sources imply that a notable uplift will be required to the number of homes that meet this standard currently and that by the end of the plan period around 5,000 homes (about 9% of the total stock) should be available that meet this criteria.
- 6.34 This is an estimated requirement for M4(2) Category 2 accessible and adaptable homes. There will also be a requirement for M4(3) Category 3 homes wheelchair user dwellings. It is difficult to model an estimate for the number of these required over the plan period and feedback from the stakeholder consultation event indicated that M4(3) category 3 homes are not as sought after as the M4(2) Category 2 accessible and adaptable homes. It is worth noting that according to the Council's Annual Monitoring Report there were 167 new homes approved that met the M4(2) standard and 15 dwellings that met the M4(3) standard in 2017/18.
- 6.35 It is important to state that when considering the requirement for Accessible and Adaptable homes, it is not possible to move those in need to the specific properties designed to meet their need. The most effective way to overcome this is to ensure there is a broad choice of homes. A greater choice will be provided if all new properties are designed to meet at least M4(2) standards, though this would be subject to an assessment of impacts on development viability.

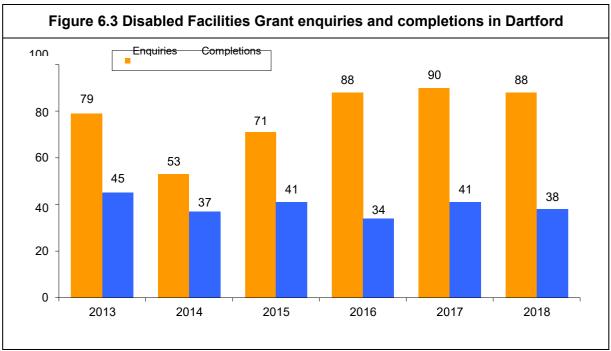
Applicants on the Housing Register who require adapted housing

6.36 There are currently 8 applicants on the housing register who require a one bedroom fully wheelchair accessible property, 9 require a two bedroom property and 7 require a three or four bedroom property. 18 applicants on the register require adapted housing but not necessarily level access, e.g. flush floor showers.

Adaptations and support

- 6.37 In addition to specialist accommodation, the Council helps people to remain in their current home by providing support and assistance. Any adaptions to dwellings provided through this mechanism could reduce the requirement for new homes meeting the M4(2) standard, depending on the nature of the adaptation work completed.
- 6.38 The figure below shows the number of enquiries for Disabled Facilities Grants for home adaptations that have been received by the Council since 2013 alongside the number of adaptations that have been completed within this programme. It should be noted that the difference between enquiries and completions reflects that a means test is applied to all applications and those able to afford to make the changes themselves are not offered the Disabled Facilities Grant. The figure shows that the enquiries for these services have increased in the last three years, however the level of completions does not vary significantly across the time period considered. The Council have indicated that the most commonly requested modifications are stair lifts and flush floor showers.
- 6.39 In this context, paragraph 005 (Reference ID: 63-005-20190626) of the PPG notes that 'Applications for Disabled Facilities Grant (DFG) will provide an indication of levels of expressed need, although this will underestimate total need, as there may be a large number of people who would want or need an adaptation, but would not have applied to the DFG.'





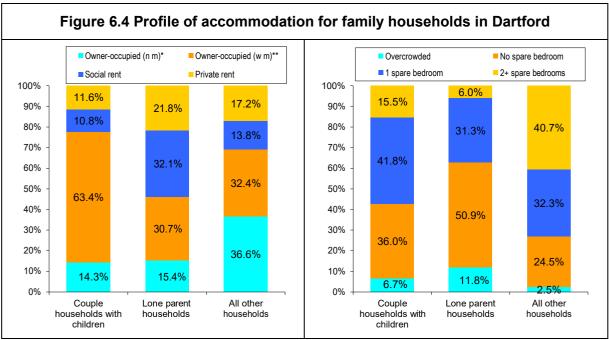
Source: Dartford Council, 2019

Families with children

Current situation

6.40 The Census provides detail on the housing situation of households with children at a local level. It is worth noting that in 2011 according to the Census 40.2% of households in Dartford were families with children, a figure higher than the regional figure (36.2%) and the national average (36.0%). The figure below shows the tenure profile of the two main types of 'family with children' households in Dartford in 2011 compared to the remainder of the household population. The figures also set out the occupancy level of these groups. The data shows that whilst there are notably fewer owner-occupiers with no-mortgage amongst couple households with children than amongst other households in Dartford, the proportion of this group in the social and private rented sector is lower than recorded for other households. Lone parents however are notably more likely than other households to be in both Social Rented and private rented accommodation. Family households with children are also more likely to be overcrowded and less likely to be under-occupied in Dartford.





*Owner–occupied no mortgage ** Owner-occupied with mortgage, includes Shared Ownership. Source: 2011 Census

Future requirement

6.41 The disaggregated local housing need projections indicate that the total population of families with children is going to rise from 18,503 in 2019 to 23,265 by 2036 (as set out in Table 4.2) and the proportion of lone parent families within this group will grow from 29.1% in 2019 to 31.5% in 2036. The tables below show the projected accommodation profile for family households in Dartford in 2036 derived from the LTBHM model, presuming that households do not have to reside in overcrowded accommodation.

Table 6.4 Type of accommodation projected for households with dependent children in 2036 in Dartford								
Size of home Owner- occupation Private Shared Ownership Social Rent/ Affordable Rented								
One bedroom	0	0	0	0	0			
Two bedrooms	2,388	899	177	1,858	5,323			
Three bedrooms	8,396	902	288	2,166	11,752			
Four or more bedrooms 5,205 516 190 280 6,191								
Total 15,990 2,317 655 4,304 23,265								

Essential local workers

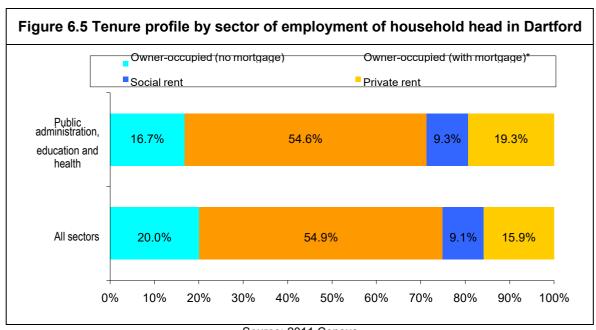
6.42 Dartford has recorded high property price rises recently and is an area with a high proportion of residents that commute out of the Borough to work. The Council is therefore keen to



understand the housing needs of essential local workers and ensure that they are able to remain in the local housing market. For the purpose of this study the Council considers essential local workers to be those employed in the health and education sectors in the Borough.

Current situation

- 6.43 The ONS Business Register and Employment Survey classifies all employees into one of eighteen industry categories. This indicated that there were 11,500 individual employee jobs⁷⁴ in Dartford in 2017 in the categories of 'Education' and 'Human Health And Social Work Activities'. This represents 20.1% of all employees jobs in the Borough, which is a figure lower than the regional (23.1%) and national equivalents (22.2%) reflecting that Dartford has a more diverse job market than many other parts of the country.
- 6.44 The figure below compares the tenure profile of households headed by someone in employed in the sectors of 'Public administration, education and health' with all households headed by someone in employment in Dartford in 2011. This indicates that households in Dartford headed by someone employed in public administration, education and health were more likely to be resident in the social and private rented sectors than average.



Source: 2011 Census

⁷⁴ Employee jobs excludes self-employed, government-supported trainees and HM Forces. Employee jobs can be both part-time and full-time. Data also excludes farm-based agriculture.



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Ability to afford local housing

- 6.45 The LTBHM model does not specifically identify the population that are employed in these sectors so we are not able to profile a housing requirement for this group. However we can test the ability of an average person working in the education and health sectors to afford housing in Dartford. Research of online vacancies in these sectors suggests that in Dartford the average starting salary for a teacher is around £23,000 with the average salary for a nurse in the Borough being around £21,000. It should be noted that these figures are useful examples and that there are a variety of roles with a range of salaries in these professions in the Borough depending on level of expertise and experience however the London weighing available to many public sector workers employed in the capital is not on offer for those working in Dartford.
- 6.46 A comparison of these incomes with the cost of housing set out in Chapter 3, indicates that on neither income would a person be able to afford a one bedroom private rented home in Dartford, which requires an income of £24,300. A one bedroom shared ownership home with either a 25% equity share or a 40% equity share would however be affordable to people on these salaries, if these products are priced in the way suggested in Chapter 3. People in these industries would however require an additional income source to be able to afford to purchase a home in Dartford.

Younger people

6.47 Another group of the population that the Council are concerned may be marginalised in the current housing market are younger people. For the purpose of this study younger people are defined as those aged between 20 and 34. It is interesting to note that this group has become less significant within the national household profile as recorded by English Housing Survey; data from this source shows that in 2008-09 when the first data under the new definitions was published, 12.1% of owner-occupied households in England were headed by someone aged under 35, whereas currently (2016-17), 9.1% of owner-occupiers are aged under 35. A similar trend has been recorded in the social rented sector⁷⁵ and the private rented sector⁷⁶. The English Housing Survey also records that the proportion of newly forming households aged under 35 has reduced from 91.6% in 2008-09 to 86.3% in 2016-07.

Current situation

6.48 The 2017-based population estimates produced by the ONS indicate that 20.2% of all residents in Dartford were aged between 20 and 34 in in 2017, a figure higher than both the regional and national equivalents (18.0% and 20.0% respectively). The data discussed in

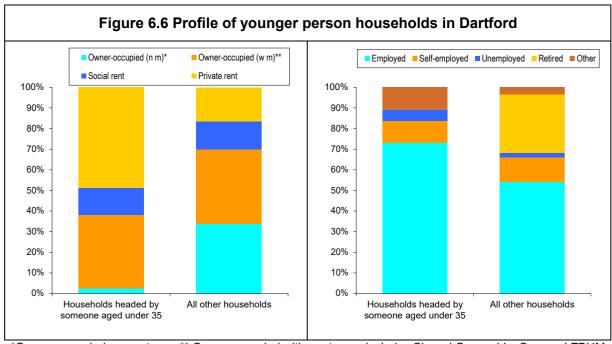
⁷⁶ The proportion of household heads aged under 35 in the private rented sector has reduced from 18.9% in 2008-09 to 17.9% in 2016-17 according to the English Housing Survey.



⁷⁵ The proportion of household heads aged under 35 in the social rented sector has reduced from 20.7% in 2008-09 to 19.4% in 2016-17 according to the English Housing Survey.

paragraph 2.17 on the number of people claiming Job Seekers Allowance in Dartford can be disaggregated into certain age bands. Whilst these bands don't correspond exactly with the 20 to 34 age group that is the focus of this section, it is interesting to note that in Dartford the rate of unemployment for those aged 18 to 24, at 3.1%, is higher than the regional average for this age group (2.4%), although it is lower than the equivalent national figure (3.6%).

- 6.49 A comparison of the latest household projections in Dartford with the household profile recorded for the Borough by the 2011 Census shows that the proportion of working age households⁷⁷ that are headed by someone aged under 35 has decreased from 26.1% in 2011 to 23.4% in 2019. The proportion of households headed by someone aged under 35 that have dependent children in the household has decreased from 56.0% in 2011 to 48.7% in 2019 in Dartford.
- 6.50 The figure below shows the tenure profile of households headed by someone aged under 35 in Dartford compared to the remainder of the household population. The figures also set out the economic activity profile of these groups. The data shows that whilst over a third of households headed by someone aged under 35 are owner-occupiers with a mortgage, almost half of these households reside in the private rented sector. Households headed by someone aged under 35 are unsurprisingly more likely to be employed and less likely to be retired than other households in Dartford, but they are also more likely to be unemployed.



*Owner–occupied no mortgage ** Owner-occupied with mortgage, includes Shared Ownership. Source: LTBHM modelling



⁷⁷ Those headed by someone aged under 65

Future requirement

- 6.51 The disaggregated local housing need projections indicate that the population aged between 20 and 34 in Dartford is going to increase from 21,568 in 2019 to 24,080 in 2036, a rise of 11.6% (as set out in Table 4.1). The projections also suggest that there will be an increase in the number of households headed by someone under 35 from 8,079 in 2019 to 8,629 in 2036, an increase of 6.8%. The projections indicate that the proportion of these households living alone in Dartford will decrease from 25.0% in 2019 to 24.8% in 2036. The projections also show that there will be a gradual increase in the number of people aged under 35 that reside in 'other' households the majority of these are places in which there is no familial bond with the other household members, they are house shares with people that are either friends or people that they have not previously known (or a combination of both).
- 6.52 The results of the LTBHM model can be disaggregated into different household groups within the whole population. The tables below show the projected accommodation profile for younger person households in Dartford in 2036 arising from that model.

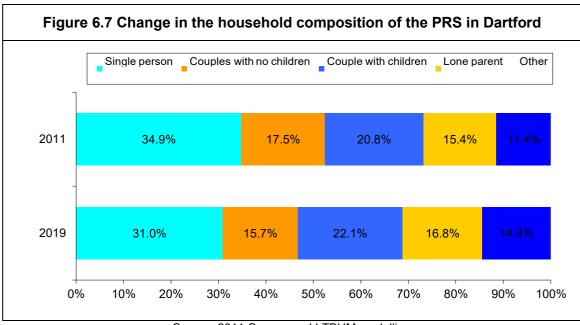
Table 6.5 Type of accommodation projected for households headed by someone under 35 in Dartford in 2036							
Size of home Owner- Private Shared Social Toccupation rented Ownership Rent/ Affordable Rented							
One bedroom	6.5%	13.9%	2.8%	1.8%	24.9%		
Two bedrooms	9.5%	12.2%	2.5%	2.8%	27.1%		
Three bedrooms	6.4%	16.0%	2.1%	2.4%	27.0%		
Four or more bedrooms	3.5%	14.1%	1.4%	1.9%	20.9%		
Total	26.0%	56.3%	8.8%	8.9%	100.0%		

The private rented sector (PRS)

Growth

- 6.53 The current tenure profile in the Borough was modelled as part of the LTBHM model. This estimated that there are 9,971 private rented households in Dartford in 2019, which represents 22.3% of households in the Borough. The private rented sector (PRS) is becoming increasingly important in Dartford; as shown in Figure 2.11, the data indicates that it increased by 33.6% in Dartford between 2012 and 2017 at a greater rate than was recorded regionally and nationally.
- 6.54 The figure below compares the household composition of the private rented sector in Dartford in 2011, with the profile of households resident in this tenure in Dartford in 2019. The data shows that not only has the private rented sector expanded, but the households in it have diversified.

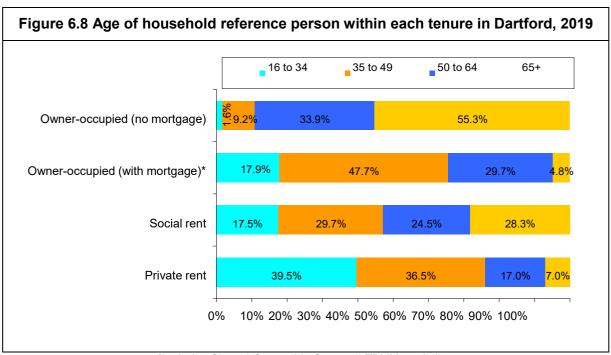




Source: 2011 Census and LTBHM modelling

Those resident in the tenure

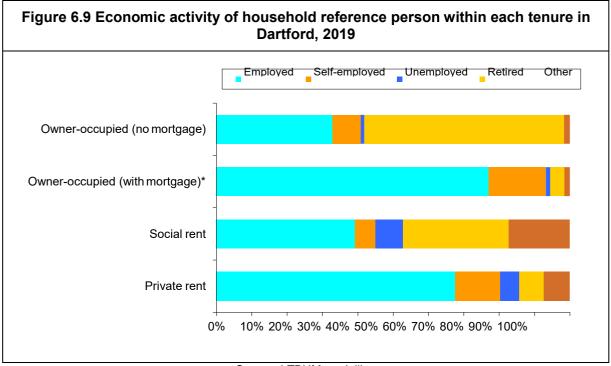
6.55 The figure below shows that whilst the private rented sector has diversified, it is still notably more likely to be occupied by younger households, with almost 40% of household reference persons aged 34 or under compared to less than a fifth of household reference persons in all other tenures.



*Includes Shared Ownership Source: LTBHM modelling

6.56 The figure below shows that whilst the majority of household heads in the private rented in Dartford are in work, there are a number where the household head is unemployed or retired.





Source: LTBHM modelling

6.57 The LTBHM model set out in Chapter 4 has been used to model the future housing market. This indicates that the private rented sector is likely to grow further in importance in Dartford over the plan period with the number of homes in the tenure projected to increase by 2,870 households by 2036, a growth of 28.8%.

Current trends

- 6.58 The PPG suggests that 'market signals reflecting the demand for private rented sector housing could be indicated from the level of changes in rents.' Therefore, to assess the stability of the sector currently it is useful to consider how the private rent levels charged vary over time. The table below shows the change in private rents over the last five years at both the median and lower quartile level. This data is disaggregated by accommodation size and location. The table shows for example that between 2012/13 and 2017/18 two bedroom lower quartile rents increased by 25.9% in Dartford.
- 6.59 Overall the data suggests that the private rented sector is under notable pressure in Dartford, as rent levels have risen at a greater rate than recorded nationally and regionally. The data does suggest that three bedroom rents are the most pressurised, although there is not a large variation by dwelling size.



Table 6.6 Change in private rents charged in Dartford, the South East and England between 2012/13 and 2017/18							
	Lowe	er quartile prices					
Area One bedroom Two bedrooms Three bedrooms Four+ bedroom							
Dartford	20.9%	25.9%	24.3%	26.8%			
South East	16.5%	15.4%	20.0%	14.6%			
England	14.6%	10.5%	9.1%	13.2%			
	Median prices						
Area	One bedroom	Two bedrooms	Three bedrooms	Four+ bedroom			
Dartford	25.0%	23.3%	39.0%	19.1%			
South East	17.6%	16.7%	25.1%	15.1%			
England	20.0%	13.0%	15.4%	20.0%			

Source: Valuation Office Agency, 2012-13, 2017-18

The benefit-supported private rented sector

- 6.60 The report 'Who Lives in the Private Rented Sector' published in January 2013 by the British and Social Housing Foundation estimates that nationally around a quarter of private tenants are in receipt of Local Housing Allowance. In Dartford the figure is 17.8%, which reflects that there are a greater proportion of employed household heads in the tenure in Dartford than is the case nationally. Further analysis shows that the number of private rented tenants in receipt of Local Housing Allowance in Dartford has decreased by 26.7% between 2014/15 and 2018/19, however this may reflect that new claimants are now on Universal Credit and claiming the housing element of this instead of Local Housing Allowance.
- 6.61 It is important to recognise the role that the benefit-supported private rented sector plays in alleviating the pressure on the affordable housing stock, by housing some households that would otherwise be resident within the sector; however, it is not an official form of affordable housing as defined by the NPPF. In addition, a comparison of the entry-level private rents with the LHA caps, as set out in Chapter 3, showed there is a notable gap between the two and the housing costs of households in need would not be fully met if they were to reside in this sector as noted in Chapter 3.

People wishing to build their own homes

- 6.62 It should be noted that the NPPF specifically refers to people wishing to build or commission their own homes within the examples cited in paragraph 61. Dartford have launched a list for people interested in undertaking a self-build development to register themselves. This reached 17 applicants up to April 2019 (when the details collected on new applicants was expanded), with three further applicants added since then.
- 6.63 People interested in self-build generally aspire towards a larger home. 15 of the 20 people on the register aspire to a self-built home with at least four bedrooms. A detached home is also sought by the majority of people on the register. It is interesting to note that of the three people



to have joined the self-build register in Dartford since April 2019, two have also joined the self-build register in a different authority as well.

- The PPG suggests that data from the Council's self-build register can be supplemented by information collated on the Self Build Portal⁷⁸. The Self Build Portal presents a limited amount of self-build data at a Local Authority level (it contains more information on the national situation). This source assesses the relative level of self-build demand in each authority in England. Dartford is assessed as having a demand for 13 self-build plots per 100,000 people in 2018. This figure is lower than all the neighbouring authorities Gravesham has a demand of 187 self-build properties per 100,000 people, in Bexley the figure is 33, in Sevenoaks it is 53 and in Thurrock it is 39. The Self Build Portal also indicates that there was an increase in the number of people on the self-build register by 2 between 2017 and 2018, a smaller figure than is typical; 40 people were added to the Gravesham register between 2017 and 2018, whilst in Bexley the figure was 33.
- 6.65 Another source of data on the potential scale of demand for self-build developments in Dartford is an examination of planning permission that have been granted in the Borough. The Council notes that in the April 2016 March 2017 monitoring year there were 13 dwellings built which received CIL exemptions for self-build residential development. In addition, planning permission was granted for a further 3 dwellings that had approved CIL exemptions for self-build residential development.

⁷⁸ https://nacsba.org.uk/





7. Conclusions

- 7.1 Chapter 1 considered the geographic context in which the local housing market operates using the latest data on migration patterns and housing market linkages. This analysis concluded that Dartford's most established linkages are those with the neighbours immediately to the west and east of the Borough Bexley and Gravesham reflecting the pattern of migration flows around London to move radially outwards. The data suggests that whilst the influence of Gravesham is reducing slightly, Dartford is becoming more closely aligned to Bexley. It is clear however that the Borough is its own housing market, although one with close links to neighbouring authorities.
- 7.2 Chapter 2 documented the derivation of the housing need in Dartford following the Standard Method described in the PPG. This indicated that there is a requirement for 797 new dwellings each year in Dartford over the plan period.
- 7.3 Chapter 3 examined the cost of housing in the Borough. This analysis indicated that there is a notable gap between the cost of Affordable Rent and market rent which could potentially be filled by intermediate products. There is also a large gap between entry-level market rent and entry-level home ownership which could be addressed by Discount Home Ownership options. It is important to note that the suitability of these intermediate and sub-market products to meet housing need to the extent identified in the report is contingent on them being priced at the levels set out in Chapter 3.
- 7.4 The report has presented two main models, the Long Term Balancing Housing Markets (LTBHM) model (Chapter 4), which disaggregates the Standard Method local housing need, to identify the tenure and size of housing that should be sought over the plan period to best accommodate the future population, and the affordable housing need model (Chapter 5), an unconstrained estimate of the amount of affordable housing required. The affordable housing need figure is calculated in isolation from the rest of the housing market and is used to indicate whether the Council should consider planning for more houses than the Standard Method local housing need figure to help meet the need for affordable housing. On completion of the calculation of the need for affordable housing paragraph 024 (Reference ID: 2a-024-20190220) of the PPG says:

The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments. An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.

7.5 Planning Authorities should consider whether the housing target in the Local Plans should be increased to assist with meeting the need for affordable housing. Once this has been established the future mix of all housing required over the plan period should be identified. In accordance with paragraph 2a-018-20190220 of the PPG this is derived using a separate approach.



- 7.6 The total annual affordable housing need in Dartford of 263 per year (as set out in Chapter 5) represents 33.0% of the annual dwelling growth of 797 in the Borough as assessed using the Standard Method. It would be reasonable to expect this proportion of new housing as affordable to be delivered on a large housing site in Dartford, where a figure of 35% would be plausible (subject to viability). Based on the evidence in this report, it is recommended that the Council sets a target of at least 35% of all new housing as affordable on all new sites that meet the minimum dwelling threshold 79. The Council can be confident that the affordable housing need identified in the model will be addressed by the dwelling growth identified by the Standard Method and no adjustment is required to this figure.
- 7.7 To determine the size and tenure of the new housing required within the Standard Method local housing need to accord with paragraph 67-001-20190722 of the PPG, the LTBHM model outputs set out in Chapter 4 are used (the change required between 2019 and 2036) the Home Builders Federation confirmed that this is a suitable approach in their response to the stakeholder consultation. This model provides the profile of housing appropriate to meet the population over the plan period and is directly derived from the calculations used to determine the Standard Method local housing need⁸⁰.
- 7.8 There is an expectation for Local Authorities to provide Affordable Rented accommodation where this meets the identified needs. We have provided a further distinction within the proposed housing mix to include the potential demand for Discount Home Ownership/Starter Homes (which reduces the requirement for private rented accommodation as they are providing an affordable home ownership opportunity for those that would otherwise reside in this tenure rather than meeting the same housing need that is addressed through Shared Ownership and Affordable Rented products).
- 7.9 The Housing White Paper, published in February 2017 proposes that Local Authorities should 'deliver starter homes as part of a mixed package of affordable housing that can respond to local needs and local markets'. There is no mandatory requirement for a proportion of all new dwellings to be Starter Homes, however paragraph 64 of the NPPF sets out a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units,

⁸⁰ In comparison, it is not appropriate to base the recommended housing mix on the results of the affordable housing need model as this is an unconstrained figure (it does not account for the role of market housing to address affordable need – such as through LHA support within the private rented sector) and is based on a particular point of time – it does not form a component of the Standard Method local housing need calculations (rather than trends across the whole plan period as is utilised in the Standard Method).



⁷⁹ An affordable housing target of 35% should result in the delivery of around 26% of all new housing as affordable (the identified requirement as set out in paragraph 7.10) once sites that do not meet the criteria for an affordable housing obligation have been excluded. Whilst Dartford has recently delivered a notable number of large sites (with an affordable housing contribution) compared to many authorities in the country, this may not continue across the whole plan-period. Furthermore, there is the possibility of an economic downturn. It is therefore prudent when looking long-term to recognise that the number of large sites delivered may reduce; this is one reason to consider a policy figure of 35% is more likely to deliver 26% of all housing as affordable across the whole plan period.

which can include Shared Ownership homes and discounted market sales products as well as Starter Homes.

- 7.10 As derived from the modelling set out in Chapter 4, the overall requirement for 14.9% of housing to be Affordable/Social Rented⁸¹ and 11.3% affordable home ownership (of which 6.2% could be Shared Ownership⁸² and 5.1% Discount Home Ownership/ Starter Homes⁸³) reflects the mix of housing that would best address the needs of the local population. It does not take into account economic viability or the funding that will be available to help provide subsidised housing; current funding streams priorities mean that it may be easier to deliver intermediate housing rather than Affordable Rent. It is important that these affordable home ownership products are priced at the relative level identified in Chapter 5 (Table 5.4), varying the cost of these options slightly notably affects the number of households that would be able to afford them.
- 7.11 To convert these figures into policy requirements it is necessary to frame them within the overall recommended target of 35% of all new housing as affordable. The target is therefore for 20% of all housing to be social/ affordable rent and 15% home ownership products, of which the majority should be shared ownership. This is the disaggregation of a 35% policy target that would best deliver the affordable housing required in Dartford. This policy would be subject to a viability assessment. Figure 7.1 details the target the Council should pursue⁸⁴.

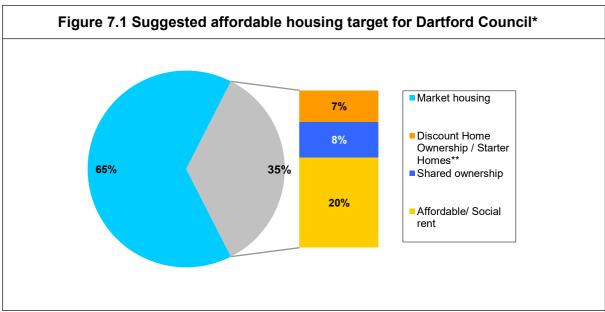
⁸⁴ It is acknowledged that not all sites coming forward across the plan period will deliver affordable housing. Suggested target



⁸¹ Figure is derived from table 4.4.

⁸² Figure is derived from table 4.4. Shared Ownership refers to the version with a 25% equity share as this has been evidenced to cost less than market entry housing in Chapter 3.

⁸³ The Discount Home Ownership / Starter Homes figure represents a potential demand rather than a requirement and is derived from paragraph 4.18.



^{*} It is acknowledged that not all sites coming forward across the plan period will deliver affordable housing.

- 7.12 Before the requirements for different sizes and tenures of housing across the plan-period is presented, it is necessary to convert the household totals presented in Chapter 4 to dwelling figures by applying the vacancy⁸⁵ rate of 2.33% (to account for the difference between the number of households likely to be accommodated in the new housing and the total new housing required in Dartford over the plan period of 797 per year). Figure 7.2 sets out the size and tenure requirement for the 11,955 dwellings (797 per annum) required over the plan period between 2021 (when the plan is due to be adopted) and 2036.
- 7.13 The profile set out is a guide to the overall mix of accommodation required in the Borough although it is acknowledged that the Council may wish to divert away from this profile in particular instances. As the Home Builders Federation noted in its stakeholder response 'in seeking to deliver a mix of housing types and size within Dartford the most effective approach is to allocate a range of housing sites. A diversity of sites will inevitably mean that a range of housing types and size are provided by a diversity of house builders 86. It should also be noted that the potential demand for Discount Home Ownership/ Starter Homes is less robustly evidenced than for the other tenures and should therefore be treated with caution.
- 7.14 It is also worth noting that should there be variations in the annual delivery of new housing in comparison to the requirement of 797 new homes currently identified following the Standard Method, the profile of new housing should still mirror the recommendations set out in Figure

⁸⁶ See Table A1.2.



^{**}Discount Home Ownership// Starter Homes figures represent potential demand rather than a requirement

⁸⁵ See footnote 54 for the derivation of this figure.

Figure 7.2 Sizes and tenures of new housing required in Dartford over the plan period (derived from the modelling set out in Chapter 4) 3,500 3,000 ■1 bedroom ■2 bedroom 2,500 Number of dwellings required 2,000 ■3 bedroom ■4+ bedroom 1,500 1,000 500 0 Shared ownership Affordable/ Socal rent DHO/ Starter Market* homes**

7.2 as this additional population will not notably skew the profile of the population resident in the Borough in 2036⁸⁷.

*Market housing includes both owner-occupied and private rented ** Discount Home Ownership// Starter Homes figures represent potential demand rather than a requirement

- 7.15 Chapter 6 considered the housing requirement of particular groups of the population. Paragraph 006 (Reference ID: 63-006-20190626) notes that 'Plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people....They could also provide indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period.'
- 7.16 In terms of specialist dwellings for older persons (Class C3), it is evidenced that in Dartford an additional 597 additional specialist units should be provided over the plan period within the housing target, of which 527 units should be housing for older people and 70 units housing with extra care. Chapter 6 also identifies that there will be an additional 359 Registered Care spaces (nursing and residential care homes) will be required over the next 17 years in Dartford (Class C2). This additional accommodation is required to meet the future institutional population and therefore does not form part of the new housing to meet the Standard Method local housing need.

⁸⁷ For example, delivery of 10% more dwellings than the figure of 797 would mean the total household population increasing by less than 2% more by 2036. Therefore, the age and household type profile would be only marginally different to that recorded in the Standard Method scenario.



7.17 In addition, it is calculated that there is an indicative requirement for around 5,000 accessible and adaptable dwellings (M4(2) Category 2) in Dartford in 2036 in the general housing stock. It is important to state that when considering the requirement for Accessible and Adaptable homes, it is not possible to move those in need to the specific properties designed to meet their need. The most effective way to overcome this is to ensure there is a broad choice of homes. A greater choice will be provided if all new properties are designed to meet at least M4(2) standards, though this would be subject to an assessment of impacts on development viability. All new dwellings being built to at least M4(2) standards would also helpfuture-proof the new housing stock as these units will continue to meet the requirements of an ageing population past the end of the plan period.



Appendix 1. Summary of consultation events

Introduction

This appendix describes the two consultation events that were conducted during the production of this report, the stakeholder consultation and the 'Duty to Cooperate' event. For both events this appendix details the consultation process – who was contacted and the nature of the consultation. It also describes the events that took place, including what was discussed. Finally, the appendix sets out any comments that were received subsequently through this process and the response to them.

Stakeholder workshop

A consultation event on the draft report findings, took place on 20th June 2019. A wide breadth and number of organisations were invited to attend to observe the preliminary outputs of the study and to discuss the methodological assumptions used to derive the estimates. In total 24 different organisations were invited including developers, Registered Providers and planning professionals. In total, five organisations attended the event. A full list of those that were invited and those that attended the stakeholder event is set out in Table A1.1. Representatives of housing and planning from the Dartford Borough Council and the Ebbsfleet Development Cooperation were also present.

The event was a presentation of the relevant national guidance which provides the framework for the study, an overview of the purpose of the report and the two main models used to obtain the outputs, the assumptions used within the models (principally focusing on the affordable housing need model), and the initial study-wide outputs that had been derived. Questions were encouraged throughout and a few topics identified for more in depth discussion —the growth of the private rented sector, the appropriate affordability threshold to use, how to deal with single people under 35 potentially in housing need and the requirement for accommodation to meet lifetime home standard.

Table A1.1 List of invitees to the stakeholder event				
Invited	Attended	Invited	Attended	
Barratt	Yes	Skillcrown Homes		
Bellway	Yes	Sunningdale Homes		
Clarion		Taylor Wimpey		
Countryside Properties		Ward Homes		
Crest Nicholson		Weston Homes		
EIGP		MHS Homes		
Fernham Homes		Golding Homes		
Galliard Homes		Moat Housing Group	Yes	
CBRE on behalf of Henley Camland	Yes	The Hyde Group		
Home Builders Federation		Clarion Housing	Yes	
Persimmon Homes		Orbit Housing Group		
Redrow		Gravesend Churches (GCHA)		



A summary of the discussion that took place at the event is presented below:

The models used

HDH: Described the approach used to calculate the figures in the LTBHM and affordable housing needs model and the different purposes they serve

RP: Can the LTBHM disaggregate by income?

HDH: No, it is trend-based model. Income and affordability is accounted for in the affordable housing needs model.

Developer: Why is the affordable housing model only counting committed supply now rather than across the whole plan period?

HDH: We have taken a cautious approach in line with the PPG. We wouldn't want to count any dwellings that we cannot know will be delivered.

Affordability threshold

HDH: It is presumed in the calculation of the affordable housing need model that 35% of gross income can be spent on housing as this is what is indicated in the market. Does this ring true with the audience?

RP: A threshold of 30% is used on the housing register, however this is a historic estimate.

Everyone agreed that 35% was a suitable figure to use in the Dartford housing market.

Single people under 35

HDH: The calculation assumes that single people under 35 can be suitably housed in the market in shared accommodation (a room in a shared house), rather than requiring a one bedroom home. This is what the LHA regulations imply and appears the market norm in Dartford with the level of HMOs in the Borough.

Everyone agreed that this was a suitable approach.

Intermediate housing

RP: Discount market housing does not really exist as a product in Dartford – help-to-buy is the most common product available.

Specialist housing

HDH: Advised that these may change in the redrafting of the report because the current situation profiled was a best estimate that needed to be verified.

Developer: The accessible and adaptable properties are popular with most customers as they like the big doors and wide space in the hallways, however there is not much demand for market wheelchair homes.



Developer: Have had a requirement to build an affordable home to be suitable for wheelchair use, but by the time it was completed it was no longer required. On other occasions homes have had requirements alter during construction period.

RP: Wheelchair homes have to be in the right location, people don't want to move town just to have wheelchair accommodation. Tenants would often rather have their home adapted than move to a specific dwelling.

Stakeholder event - written consultation

A copy of the draft report was sent to all the attendees, as well as those originally invited that were unable to attend. All recipients were encouraged to feedback their views. The deadline for the consultation responses was 5th July (over a two-week period).

Consultation responses

In total just one organisation submitted a formal response to the consultation process. A summary of the points raised by them and how they have been addressed is set out in Table A1.2.

Table A1.	Table A1.2 Comments received through formal consultation and a how they have been					
	addressed					
Respondent	Comment	Response to comment				
Home Builders Federation	The approach taken by the Council in its HNA would appear to follow that laid out in Planning Practice Guidance. As required by the NPPF it considers housing mix and tenure on the basis of the level of local housing needs established using the standard method	Support for the approach noted in chapter 7 of the report.				
Home Builders Federation	In considering the nature of the population growth in Dartford arising from meeting local housing needs the HNA uses the 2016-based population projections and its components as the foundation. As the latest projections available to the Council this is an appropriate approach. However, we note that on page 52 at paragraph 4.4 the Council does not consider the fact that building additional homes to have any impact on household formation and has used the household formation rates form the 2016-based household projections. This would appear to be contrary to Government expectations as to the potential impact of the uplift to housing delivery from the application of the standard method and the continued use of the 2014-based household projections within this method. To some extent the Council has considered this with the adjustments made to counter the existence and overcrowding but the Council may want to reflect on whether an improvement to household formation rates above those used in the 2016-based household projections should be included within the HNA.	It is presumed that the additional dwellings to be built in Dartford will be filled by more in-migrants to the Borough rather than as a consequence of household formation rates increasing to fulfil the gap between the dwelling requirement and the household growth identified in the 2014-based projections. This assumption is made because the nature of the dwelling growth to come forward in Dartford (partly within the Thames Gateway development within the EDC area), means that households will continue to move into the Borough as these new dwellings become available (EDC has evidence that the majority of residents moving into new homes there come from outside the local area), but also the increase in household formation rate to address the gap would be too great to be realistic. It is also worth noting that one of the consequences of the rise in in-migrants in the approach used in this report is that the population in the Borough modelled produces a relatively high rate				



		of household formation (1.8% compared to 1.3% nationally as documented in paragraph 5.12).
Home Builders Federation	The HBF does not comment on specific sites within a Council's proposed supply. However, we do consider it important that the Council provides clear evidence supporting the delivery rates for sites within its housing trajectory and that there are sufficient outlets on strategic sites to meet delivery expectations. These should be set out within the supply statement to provide the necessary evidence supporting the Council position and providing confidence to all stakeholders that the homes required are being delivered.	Further clarity has been added to the relevant sections of the report - principally paragraph 5.19. This comment also relates to the Strategic Land Supply which is outside the scope of this report.
Home Builders Federation	We note that the Council has includes a small site allowance within its five-year housing land supply (table AC.4). Whilst we recognise that such sites will form part of the supply it is essential that there is compelling evidence to support the level of windfall allowance being proposed. Whilst the level on windfall is relatively small there is currently no justification provided. In particular the Council will need to justify why it has included an allowance for windfall in the first two years of the five-year land supply as there is potential for double counting delivery from existing permissions. To ensure there is no double counting we would recommend that no allowance for small sites is included within 2019/20 or 2020/21.	This comment relates to the five years land supply which is outside the scope of this report.
Home Builders Federation	As outlined above the HNA would appear to provide a reasonable basis against which to consider the type and tenure of housing that is needed within Dartford. However, our members have concerns as to how housing needs assessments are often used to dictate the type and mix of market housing on each site on the basis of what is needed for the Borough as a whole. The mix of market housing on a site will be dictated by its location, the size of the site, its topography and demand for such homes within that specific locale. We would recommend that in seeking to deliver a mix of housing types and size within Dartford the most effective approach is to allocate a range of housing sites. A diversity of sites will inevitably mean that a range of housing types and size are provided by a diversity of house builders. This will be of particular importance for Dartford where there is a reliance on delivery by the Ebbsfleet Development Corporation and the allocation of smaller sites elsewhere in the Borough will compliment delivery of its strategic sites.	The need for the Council to be flexible in its approach to securing the desired dwelling mix has been emphasised in chapter 7 with a comment on the suitability of allocating a range of sites added to paragraph 7.10.

Duty to Cooperate Event

To enable the most effective working relationship between Dartford and its neighbouring authorities the Council organised an event where these neighbouring authorities could learn about the draft outcomes of the project and the implications for the Council's Local Plan. This was done to try and promote transparency of the process and the outcomes produced as well as facilitating good partnership working more generally. In total seven different organisations were invited of which five attended the event. A full list of those that were invited and those



that attended the stakeholder event is set out in Table A1.3. Representatives of planning from the Dartford Borough Council also attended.

The event was a presentation of the relevant national guidance which provides the framework for the study, an overview of the latest data on housing market relationships across authorities, the calculation of the overall housing need using the standard method, the model used to disaggregate the housing need and identify the tenure and size of new housing required over the plan period, the affordable housing need figure and its implications and the requirements of specific groups of the population. Questions were encouraged throughout and a few topics identified for more in depth discussion –the changes in migration flows recorded, the derivation of the overall housing need, the modelling of the housing mix required, the calculation of the affordable housing need and the requirement for specialist accommodation.

Table A1.3 List of invitees to the Duty to Cooperate event					
Invited Attended Invited Attended					
Thurrock Council		Sevenoaks Council	Yes		
Bexley Council Yes Kent County Council		Yes			
Greater London Authority Ebbsfleet Development Cooperation Yes					
Gravesham Council	Yes				

A summary of the discussion that took place at the event is presented below:

Migration Patterns

HDH: The latest population projections indicate that the migration flows between Dartford and Gravesham are reducing in volume relatively (although flows between Gravesham and Dartford are still considerable), and there are more people moving into the Borough form inner London authorities.

Gravesham Council: What is the margin of error used in the migration flow figures used in the population projections?

HDH: We will confirm and record this in the report.

Overall Housing Figures for Dartford

HDH: Using the standard method the housing need in Dartford is 797 homes per year over the plan period.

Bexley Council: What is Dartford's current Local Plan housing figure?

Dartford Council: Dartford's figure is, in summary, a range of 585-865 dwellings per annum and Dartford has used the higher figure for the purpose of the cap.



Model Types

HDH: The approach uses the Neil McDonald model to determine the profile of the population in the Borough in Dartford at the end of the plan period. This model aligns very closely to what is done by ONS when producing their projections and uses the same source data that informs the population and household projections

Kent County Council: Are there other models available which could be used for assessing the need for housing, other than the one used here?

HDH: Yes. All models use the same data from the ONS but make different assumptions. The Neil McDonald model used in this study uses data on the people moving into the Borough and is a close replica of ONS's model. It has been tested and been found to be sound and robust. POPGROUP is another model.

Owner Occupied Dwellings/HMOs

HDH: Discussed the outputs of the LTBHM model in terms of the size and tenure of new housing required in Dartford

Kent County Council: Does the figure for owner-occupied dwellings required (7,572) include family homes occupied as small HMOs?

HDH: Yes, it includes shared groups living in a dwelling, e.g. where a property owner sub-lets rooms to different individuals.

Kent County Council: KCC are wondering if this could be happening at Ebbsfleet Green, i.e. large houses were not generating the children expected through their pupil product ratios.

EDC: stated that there are now resident liaison groups to discuss various issues, e.g. future schooling, open space, aspirations. They consider that many of the houses are occupied by couples who have not yet had children.

Affordable Housing Model Purpose

HDH: It was explained that the affordable housing model is looking at a point in time to try to understand the extent of affordable housing need and whether an uplift to the overall housing required in the Borough is necessary as a consequence. It uses the approach in the PPG. Using a 35% of income affordability threshold, 263 affordable dwellings are needed in Dartford per annum.

Types of Affordable Housing

EDC: What data has been used for the current affordable housing supply?

HDH: This is information from schemes that have planning permission or are very likely to come forward in the near future – it is a conservative figure reflecting only what the Council feels is very secure. It was explained that viability affects the ability to provide social rented housing as opposed to affordable rented housing.



EDC commented that Eastern Quarry will generate a lot of shared ownership housing, but relatively less affordable rented.

Older Persons Accommodation

HDH: The study uses POPPI and PANSI models to evaluate needs for older people. The PPG now includes a section on housing for older and disabled people. The changes do not create any new requirements; it is more of a change in emphasis. There is no guidance on what to do with the results of the modelling work in relation to older people and the suggestion is to monitor.

KCC commented that as the funding is decreasing there are more care homes closing down, especially the smaller facilities. This means that there are likely to be fewer care home places in the future. Most care homes in Kent are privately run. KCC's approach is to try to keep people in their own homes as long as possible.

DBC noted there was no clear evidence of this in the Borough, e.g. through examples of major changes in provision of late, but that any specific evidence would be welcome.

Accessible and Adaptable Accommodation

HDH: More work needs to be carried out in relation to standards for accessible and adaptable housing. There are inconsistencies in the way that Local Plan inspectors deal with the issue.

KCC: What is the additional cost per unit of providing accessible and adaptable housing?

HDH: £581 for accessible and adaptable housing, around £10,000 for wheelchair adaptable and £20,000+ for wheelchair accessible.

Other Authority Updates

DBC: Given changes in guidance and the new NPPF, where is everyone else at on housing needs evidence?

Bexley Council: Bexley has a draft SHMA, but this is not public. Bexley is trying to reconcile national and London housing targets, so they are in a slightly different situation. Current draft London Plan requires 10% of all homes to be for wheelchair users.

Sevenoaks Council: SDC has a policy which requires 5% wheelchair user dwellings on developments of 20 units or more. The Local Plan Examination will take place in September and nothing major in respect of this policy has arisen.

Gravesham Council: GBC will update their housing needs evidence as the SHENA is out of date. This work has not yet been commissioned.





Appendix 2. Details of the NMSS model

Overview

The NMSS model is an Excel spreadsheet model which seeks to replicate as closely as is reasonably practicable the methods used by MHCLG and ONS in producing the official population and household projections. It was developed by Neil McDonald to support local authorities and others in estimating objectively assessed housing needs. It has been widely used in Local Plan preparation; Local Plan examinations; and S78 planning appeals and inspectors have been happy to rely on its conclusions.

The model takes as its starting point a set of official projections – currently either the 2014 or 2016-based projections. It is a 'stepping model' which means it takes one year's population figures and estimates of births, deaths and migration flows in the ensuing 12-month period to produce an estimate of the following year's population. That process is then repeated year by year until the end of the projection period is reached.

The estimates of births, deaths and migration flows are based on flow rates derived from official projections and these can be adjusted to produce variant projections. The flow rates are applied to the previous year's population which means that if the model is being used to explore, say, the consequences of assuming higher outflows of students than envisaged in the official projections, the impact this will have on births, deaths and migration flows is automatically taken into account.





Appendix 3. Detail of the calculation of the affordable housing need in Dartford

This appendix sets out the results of the three broad stages of the model used to calculate affordable housing need. Within each of the three stages there are a number of detailed calculations many of which themselves have a number of components. This appendix presents details of how each of these stages is calculated using locally available data for Dartford.

Stage 1: Current unmet gross need for affordable housing

The first stage of the model assesses current need. This begins with an assessment of housing suitability, before the affordability test is applied to determine the number of these households that require affordable housing and are therefore in current need.

The PPG sets out four particular categories of unsuitable housing that should be specifically identified. These are presented in the table below for Dartford, which also indicates the number of households in each category and the source of the data. The final column represents the revised total for each of these categories once any double counting between them has been taken into account. Households can be unsuitably housed for more than one reason, so it is important that they are only counted once.

The first table shows that there are 2,856 households currently in unsuitable housing or lacking their own housing in Dartford and the most common reason for unsuitability is overcrowding. This figure of 2,856 represents 6.4% of all households in the Borough.



Table A5.1 Cı	urrent households who lack their own housing or live in Dartford	in unsuitab	le housing
Element	Source	Number of household s	Revised number of household s
Homeless households	Dartford Council's housing register as of May 2019.	126	126
Households in temporary accommodation	Section E6 of the Council's P1(E) return for 4 th quarter of 2018.	10888	089
Overcrowded households	2011 Census modelled to Spring 2019. This was done by calculating the annual change in the number of overcrowded households (in terms of rooms not bedrooms as bedrooms were not included in the 2001 Census) recorded in Dartford between the 2001 and 2011 Census. The eight-year change for each tenure recorded from this source was averaged against the latest eight-year change for each tenure recorded nationally by the English Housing Survey. This average was applied to the 2011 Census figures for overcrowding in each tenure to derive an estimate for 2019.	2,337	2,337
Concealed households*	2011 Census modelled to Spring 2019. This was done by calculating the annual change in the number of concealed households recorded in each authority between the 2001 and 2011 Census and applying this the number of concealed households identified in the 2011 Census.	607	18590
Other groups	The Council's housing register as of May 2019. Only households that are on the register due to a category of unsuitable housing are included (excluding overcrowded, temporary, concealed and homeless households accounted for above).	208	208
Total		3,386	2,856

Source: 2011 Census data modelled to 2019, the Council's Housing Register *Concealed households include couples, people with young children and single adults over 25 sharing a kitchen, bathroom or WC with another household.

Affordability

Some of these households in unsuitable housing are likely to be able to afford alternative accommodation in the market sector without requiring subsidy. The ability of these households

⁹⁰ The 2011 Census indicated that 69.4% of concealed households were also overcrowded in Dartford.



⁸⁸ This only includes households living in non-self-contained temporary accommodation i.e. nightly paid, privately managed accommodation and hostels.

⁸⁹ All households in temporary accommodation are also on the Council's Housing Register, although the type of accommodation they occupy is not separately distinguished so this is obtained from the P1(E) form.

to afford the cost of entry-level market housing (whichever is the cheaper of entry-level private rent and entry-level owner-occupation) of the appropriate size (set out in Figures 3.2 and 3.3) is therefore tested. The housing register details the size of accommodation required by homeless households and households unsuitably housed for other reasons. For overcrowded households and concealed households, the household composition recorded for these households in the Census is used to determine the size requirement profile. To test overcrowded households the income distribution for each dwelling size requirement, identified using the CACI income profile for the Borough, is adjusted to reflect that nationally the income of overcrowded households is 96.8% of the figure for all households (according to the English Housing Survey). Similarly, for homeless, concealed and 'other' unsuitably housed households the income distribution is adjusted to reflect that nationally the income of Social Rented households is 53.7% of the figure for all households (according to the English Housing Survey).

These households in unsuitable housing or lacking their own housing are therefore tested for their ability to afford market housing in their authority using an affordability test where the cost of housing can constitute up to 35% of gross income and still be affordable in Dartford⁹¹. The impact of using other thresholds is examined at the end of this chapter. The table below shows the number of unsuitably housed households requiring different dwelling sizes and the proportion of these households able to afford the market-entry point (either to rent or to buy, whichever is cheaper). The number of households that are therefore in current need is shown in the final column.

Table A5.2 Affordability of households in unsuitable housing in Dartford				
Number of bedrooms required	Unsuitable housed households	Percentage unable to afford both entry- level private rent and entry-level owner-occupation	Households in current need	
One bedroom	258	49.8%	129	
Two bedroom	1,013	43.8%	444	
Three bedroom	891	43.3%	386	
Four or more bedrooms	r or more bedrooms 693		414	
Total	2,856	48.0%	1,372	

⁹¹ This affordability test is used as this is the most appropriate figures when the affordability of local housing is considered based on practice in the market. As this study is seeking to make a 'policy off' assessment of the housing market, an assumption that reflects the workings of the market should be used. Appendix 4 of this report sets out the evidence that this is the correct current situation in the Borough.



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Overall 48.0% (1,372 households) of unsuitably housed households or households lacking their own housing in Dartford are in current need. For the purposes of the housing needs assessment, households considered to be in housing need have been split into two categories: current occupiers of affordable housing in need that would make the property available when they move (this includes occupiers of Social Rented and Shared Ownership accommodation that are not living with another household currently), and other households. It is estimated that some 625 households in need in Dartford currently live in affordable housing that would become available for reuse⁹².

Total current need

The table below summarises the first stage of the assessment of affordable housing need as set out by PPG. The data shows that there are an estimated 1,372 households in current need in Dartford.

Table A5.3 Stage 1: Current unmet gross need in Dartford		
Component		
Homeless households and those in temporary accommodation	125	
Overcrowded and concealed households	1,099	
Other groups	148	
Total current housing need (gross)	1,372	

Stage 2: Newly arising affordable housing need

In addition to Current Need, there will also be Newly Arising (ongoing) Need. This forms the second stage of the affordable housing need model. This calculation, as per paragraph 021 of the PPG (Reference ID: 2a-021-20190220), is based on two elements:

- Number of newly forming households each year (x proportion unable to afford market housing)
- Plus existing households falling into need per year

⁹² For those households who lack their own housing or live in unsuitable housing it was necessary to not only establish the number of households in each category, but also their current tenure (alongside the type of household they were and the size of home they required). This was obtained from the original data sources detailed in Table 5.1.



Need from newly forming households

One of the outputs produced within the process of disaggregating the total housing need into a future population and household typology (as described in Chapter 4) is the calculation of the number of households that will form over the plan period in Dartford. This figure is then averaged to provide an annual estimate for the number of newly forming households. Using this methodology, it is estimated that 811 new households will form per year in the Dartford area. This represents a household formation rate of 1.8%, higher than the figure of 1.3% recorded nationally by the English Housing Survey⁹³.

To assess the ability of these households to afford entry-level market housing (whichever is the cheaper of entry-level private rent and entry-level owner-occupation) of the appropriate size, the household composition for these new households identified within the disaggregation process are used to determine the appropriate size requirement profile. To test newly forming households' ability to afford market housing, the income distribution for each dwelling size requirement is adjusted to reflect that nationally the income of newly forming households is 70.2% of the figure for all households (according to the English Housing Survey). The table below details the derivation of newly arising need from newly forming households. It shows that 40.6% of newly forming households will be unable to afford market housing in Dartford (both private rent and owner-occupation), which means that there will be an annual affordable housing requirement from 329 newly forming households.

Table A5.4 Newly arising need from new household formation (per annum) in Dartford		
Component		
Number of newly forming households	811	
Proportion unable to afford entry-level market housing (both entry-level private rent and entry-level owner-occupation)	40.6%	
Number of newly forming households requiring affordable accommodation	329	

Existing households falling into need

The current PPG does not provide detail on how this step should be calculated, however the previous version (of the PPG) recommended that this figure is derived by looking at recent trends in households applying for affordable housing. Analysis of the lettings of affordable accommodation within Dartford over the last three years (April 2016 to March 2019) indicates

⁹³ The relatively high household formation rate reflects that the population in Dartford is notably younger than is found nationally. It is also worth noting that whilst the figure of 1.8% may appear high, the household formation rate nationally was above 2% between 1995/16 and 2000/01 (and also in 2004/05) and it is only more recently that it has dropped below 1.8% for a sustained period (it was most recently 1.8% four years ago in 2012/13). In addition the 2016-based household projections suggest that nationally the household formation rate will begin to increase again from 2021 onwards.



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that there were 998 households that fell into need over the last three years in Dartford, excluding those that were newly forming households (which have featured in the previous step). Annualised this is 333 (998/3) households per year in affordable housing need.

Total newly arising need

The table below summarises the second stage of the assessment of affordable housing need as set out by the PPG. The table indicates that 662 (329+333) households will be in newly arising need per annum in Dartford.

Table A5.5 Stage 2 Newly arising need (per annum) in Dartford		
Component		
New household formation (gross per year)	811	
Proportion of new households unable to buy or rent in the market	40.6% (329)	
Existing households falling into need	333	
Total newly arising housing need (gross per year)	662	

Stage 3: Current affordable housing supply

Paragraph 022 (Reference ID: 2a-022-20190220) of the PPG indicates that the current supply of stock available to offset the current need includes stock from current occupiers of affordable housing in need, surplus stock from vacant properties and the committed supply of new affordable units. Units to be taken out of management are removed from the calculation.

Current occupiers of affordable housing in need

It is important when considering net need levels to discount households already living in affordable housing. This is because the movement of such households within affordable housing will have an overall nil effect in terms of housing need. As established when calculating current need (paragraph 6 of this appendix), there are 625 households currently in need already living in affordable housing in Dartford.

Surplus stock

A certain level of vacant dwellings is normal as this allows for transfers and for work on properties to be carried out. Established good practice suggests that if the vacancy rate in the affordable stock is in excess of 3%, some of the vacant units should be considered as surplus stock which can be included within the supply to offset housing need. Dartford records a vacancy rate in the affordable sector of 0.3%. As the vacancy rate is lower than the 3%



benchmark⁹⁴, no vacant dwellings are considered available to be brought back into use to increase the supply of affordable housing in Dartford.

Committed supply of new affordable units

The PPG indicates that 'the committed supply of new net affordable homes at the point of the assessment (number and size)' be taken into account within the model. The Council has provided their affordable housing forecast which details the expected affordable housing completions as at May 2019. All of the sites have been examined and only those which have planning permission and where the tenure profile and number of dwellings to be provided has been agreed are included⁹⁵. In total, there are 1,036 new affordable homes committed across Dartford currently (although it is acknowledged that these will be delivered over the next five years).

Planned units to be taken out of management

The PPG states that the 'units to be taken out of management' should be quantified. The Council has indicated that there are no affordable housing replacement schemes that will lead to a net loss of affordable accommodation and so a figure of 0 is used for this stage.

Total current affordable housing supply

Having been through the four components in order to assess the current affordable housing supply, the stage of the model is summarised in the tables below. The data shows that there will be an estimated 1,661 affordable homes available in Dartford.

Table A5.6 Stage 3 Affordable housing supply in Dartford		
Component		
Affordable dwellings occupied by households in need	625	
Surplus stock	0	
Committed supply of affordable housing	1,036	
Units to be taken out of management	0	
Total affordable housing stock available	1,661	

⁹⁵ Sites without planning have been excluded as have sites where planning permission has been granted but the number of affordable dwellings to be provided has not been confirmed.



⁹⁴

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/11812/Strategic_Housing_Market_Assessments-Practice_Guidance.pdf (page 47)

Stage 4: Future housing supply of social re-lets and intermediate affordable housing

The future supply of affordable housing is the flow of affordable housing arising from the existing stock that is available to meet future need⁹⁶. It is split between the annual supply of social re-lets and the annual supply of re-lets within the intermediate sector⁹⁷.

The future supply of Social/Affordable Rented housing

This is an estimate of likely future re-lets from the existing affordable stock. Data on the affordable accommodation lettings within Dartford over the last three years is used for this figure. However, these lettings will include households housed in new accommodation. It is therefore necessary to discount the number of new lettings to derive a figure for the number of re-lets over the last few years⁹⁸. The average number of re-lets across the Social and Affordable Rented sector over the three-year period was 339 per annum in Dartford.

It should be noted that the affordable housing need model is an assessment of the housing market at a particular point of time (May 2019) and does not consider likely future changes to the housing market that may impact the results – such as future loss of affordable stock through Right-to-Buy or gain in affordable dwellings from future new build programmes⁹⁹.

Supply of intermediate housing

In most local authorities, the amount of intermediate housing (mostly Shared Ownership) available in the stock is fairly limited (as is the case in Dartford). However, it is still important to consider to what extent the supply may be able to help those in need of affordable housing. Therefore, we include an estimate of the number of intermediate units that become available each year, based on applying the estimated re-let rate for the Social Rented sector¹⁰⁰ (5.6% in Dartford) to the estimated stock for each form of intermediate housing. This is set out in the

¹⁰⁰ This is calculated by dividing the total number of relets (339 as set out in the previous step) by the total stock of social and affordable housing as set out in the HCA's Statistical Data Return, 2018 and each Council's LAHS return, 2018.



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⁹⁶ Whilst this is not a step that is detailed in the current PPG, it is logically required to reflect that there is a flow of housing becoming available to meet need as well as a flow of households requiring affordable housing (Stage 2 of the model). This stage has also been included in all previous iterations of this model that have been published in government guidance.

⁹⁷ The intermediate sector includes all affordable tenures other than social rented and Affordable Rented.

⁹⁸ The information on the lettings of affordable accommodation provided by the Council did not indicate whether the dwelling was an existing or new home. The proportion of all lettings that were to new dwellings in Dartford recorded in the most recent three year period (2015/16 to 2018/18) according to the CORE LA Area Lettings Reports is therefore used. CORE (COntinuous Recording) is a national information source funded by the Department for Communities and local Government that records information on the characteristics of both private registered providers and local authority new social housing tenants and the homes they rent and buy.

⁹⁹ The loss of homes through Right-to-Buy would mean that the number of dwellings in the total stock is reduced so the re-let rate applies to a smaller total stock each year and will therefore produce a smaller supply of affordable housing. The reverse is true if future affordable housing delivery means that the total stock increase in size.

table below. It is estimated that around 43 units of intermediate housing will become available to meet housing needs from the existing stock each year in Dartford.

Table A5.7 Estimated intermediate supply in Dartford			
Intermediate tenure	Stock	Annual re-lets	
Shared Ownership	769	43	

Source: HCA's Statistical Data Return 2019, Council LAHS 2019

Annual future supply of affordable housing

The total future supply of affordable housing is the sum of the Social Rented supply and the intermediate supply as set out in the tables below.

Table A5.8 Stage 4 Future supply of all affordable housing (per annum) in Dartford		
Component		
Annual supply of Social/Affordable Rented re-lets	339	
Annual supply of intermediate housing available for re-let or resale at submarket levels	43	
Annual supply of all affordable housing	382	





Appendix 4. Evidence to support the affordability threshold used in report

The affordability threshold

As part of the process of identifying future needs for affordable housing, the Planning Practice Guidance (Paragraph: 021 Reference ID: 2a-021-20190220) states that planning authorities should 'identify the minimum household income required to access lower quartile (entry level) market housing (strategic policy-making authorities can use current costs in this process, but may wish to factor in anticipated changes in house prices and wages)'. Current cost can be identified as the percentage of household income spent on housing in the local market at the time of the assessment. This can be assessed through both a quantitative and qualitative analysis of the local housing market. The results of this analysis are presented below.

Quantitative analysis

A comparison of the median private rent across Dartford ascertained from the housing market price survey (set out in Figure 3.3) with the median household income in the private rented sector in the Borough (using the CACI income profiles summarised in Figure 2.8) shows that on average households in the tenure in Dartford spend 36.5% of the household income on rent. When lower quartile household incomes in the private rented sector are compared to lower quartile rents it can be seen that households at this level in Dartford typically spend 41.0% of their income on rent.

The information provided by CACI Paycheck on the average amount paid on private rent by households in this tenure in Dartford (as discussed in paragraph 3.31 of this report) can be compared to the average household income in the sector. This shows that the average annual spend of £11,576 on their private rent represents 34.9% of the average household income of those living in the tenure in Dartford.

Qualitative research

The affordability thresholds in operation in the market have also been substantiated through discussions with letting agents and mortgage brokers about the workings of the local market. Landlords want to let property at a rent that the tenant can afford so to avoid the expense of recovering rent arrears, evictions and re-letting, and lenders want to avoid the expensive repossession process. Both go to some length to ensure properties are affordable to the tenants or occupiers. Letting agents use credit reference agencies (such as Experian) and lenders require potential borrowers to fill out very detailed forms on all aspects of a household's expenditure.

The comments from letting agents were varied (some did not wish to engage). It was clear that multi person households (either living as couples or just together) spend a relatively greater proportion of their income on housing and that for larger properties this may be over 50%. The letting agents considered this to be affordable – because the household afforded it



(as evidenced by the fact that they do not fall into arrears). Lower down the market, at the level we are considering (i.e. the lower quartile point) the general feedback was in the range of 30% to 40% of gross household income was affordable.

This evidence indicated that the lower quartile figures derived from the quantitative analysis would be too high to base the affordability test on and that the median figures are more appropriate. The median figures were then rounded down to the nearest 5% to better match the qualitative information and ensure the affordability thresholds used were not above average.

Conclusion

The report however is not trying to judge what is affordable but reflect how the market currently operates as per the Planning Practice Guidance - it presents a policy-off assessment of the level of affordable housing need. The market analysis presented above clearly shows that the current threshold in Dartford is 35%.

We include within the report the results of the model when alternative affordability thresholds are used to be transparent about the consequences of using this position, however the qualitative and quantitative data obtained from the market indicates that the baseline current position is as described.



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HDH Planning and Development Ltd

Registered in England Company Number 08555548 Clapham Woods Farm, Keasden, Nr Clapham, Lancaster. LA2 8ET simon@hdhplanning.co.uk 015242 51831 / 07989 975 977

