

SUPPLEMENTARY PLANNING GUIDANCE NOTE 6

AFFORDABLE HOUSING



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Executive Summary

1. Policy H6 of the Hastings Local Plan 2004 sets out the Council's policy towards the provision of affordable housing in the Borough. This Supplementary Planning Guidance is designed to give practical guidance to housing developers by amplifying the provisions of Policy H6. The Council has adopted this SPG as informal guidance and will take it forward as a Supplementary Planning Document in the autumn of 2004 under the new Local Development Framework provisions in the Planning and Compulsory Purchase Act 2004. In the meantime it will be taken into account in the determination of planning applications.
2. Policy H6 was considered by the Inspector, who conducted the Local Plan Inquiry in 2002/3. In his Report the Inspector indicated his support for the main elements of Policy H10 (now H6). The only recommendation of the Inspector that the Borough Council has not accepted in its entirety is his suggestion of a range of 20% to 30% provision of affordable housing on individual sites. In order to provide clarity for developers, the Council has adopted a requirement of 25% on brownfield sites and 30% on greenfield sites.
3. The Council's Housing Needs Survey 2001 identified a need for the provision of 763 social rented housing units per annum in the Borough. It concluded that other forms of affordable housing would not meet the needs of residents. The Council's Housing Strategy's objective is to build approximately 70 social housing units per annum. The housing allocations in the Local Plan could produce a total of 458 units in the period to 2011. This is much less than the scale of problem identified. The availability of Social Housing Grant (SHG) will be very limited and the amount of social rented housing that can be produced over the next few years will therefore depend on the degree to which "SHG free" affordable housing can be produced.
4. The sites which will be expected to provide affordable housing are listed in Policy H6. In addition unidentified ("windfall") sites of 15 or more dwelling or 0.5 hectares or more in size, which come forward as a result of the planning process, will be expected to contribute in accordance with the principles set out below.
5. The SPG sets out 5 key principles for the provision of affordable housing on individual sites :-
 - affordable housing provision should take the form of social rented housing to be transferred to a Registered Social landlord (RSL)
 - brownfield sites should provide 25% social rented housing;
 - greenfield sites should provide 30% social rented housing;
 - where issues of financial viability are raised by applicants for planning permission, and where policy H6 applies, planning applications should be accompanied by a current viability analysis of the proposal in the format shown in Appendix 2.
 - the price paid for the social rented housing by the nominated RSL will depend on the income stream forecast for the affordable units in question. In exceptional circumstances the Council might accept a payment in lieu of completed units.

6. Developers will be expected to enter into a Section 106 Agreement to secure the transfer of the completed dwellings. Model clauses are set out in the SPG. There will also be a Nomination Agreement specifying the size and location of the social rented housing.
7. The Council will nominate one or more RSLs to particular developments from a list of partner RSLs in Appendix 1.
8. The SPG emphasises the need to integrate the social rented housing into the development through quality design. Early consultation with the Council's Housing and Planning Departments is encouraged.

1. Foreword

- 1.1 The Council would normally take this Supplementary Planning Guidance (SPG) note through public consultation before adoption. However the Planning and Compulsory Purchase Act 2004 replaces the present Local Plan system with a Local Development Framework, which includes provision for the preparation of Supplementary Planning Documents (SPD) to replace SPGs. It is the Council's intention to take this SPG forward as a SPD, probably in the winter of 2004. Full public consultation will be undertaken as part of this process. As a SPD, this guidance will carry greater weight as a material consideration in the determination of planning applications and planning appeals, than it would as SPG adopted under the present system.
- 1.2 In the meantime the Council has adopted this document as interim guidance for development control purposes. It will be taken into account in the determination of planning applications and, although it will be used flexibly by the Council, planning applications which do not meet its requirements may be refused planning permission.

2. Introduction

- 2.1 This document is designed to provide a practical guide to the Borough Council's policy on affordable housing. Its purpose is to help key stakeholders and others in the preparation of planning applications for new housing development in Hastings and thereby minimise delays in their determination.
- 2.2 This SPG is seen as particularly important in giving house builders and developers a clear idea of what is involved in the provision of affordable housing in Hastings. The Hastings Local Plan 2004 provides firm policy guidance in Policy H6 'Social Rented Housing', which is referred to in more detail in Section 3. This SPG is designed to spell out the practical implications of the Policy.

3. National and Local Guidance

National Guidance

- 3.1 Planning Policy Guidance Note 3 (PPG3) (March 2000) is the latest source of Government Guidance. It repeats the statement of Circular 7/91:

'A community's need for a mix of housing types, including affordable housing, is a material planning consideration which should be taken into account in formulating development plan policies and in deciding planning application involving housing. Where there is a demonstrable lack of affordable housing to meet local needs – as assessed by up-to-date surveys and other information – local plans and UDPs should include a policy for seeking affordable housing in suitable housing developments' [PPG3 para 14]

The PPG goes on to require that local plan policies should define what the local authority considers to be affordable; indicate how many affordable homes need to be provided; and identify suitable areas and sites for such housing (PPG3 para 15).

- 3.2 Draft Revised Guidance on the affordable housing element of PPG3, published in July 2003 ('Influencing the size, type and affordability of housing') reflects the same approach. This draft guidance will, when finally published, probably in the first half of 2004, replace the current Circular 6/98 on affordable housing. The new draft differs from the current circular particularly in relation to the tenure of affordable housing. Circular 6/98 specifies certain types of housing as affordable, provided that they can indeed be accessed by those who cannot afford normal market prices. It forbids mention of tenure. The new draft is more relaxed:

'Affordable housing should not normally be defined by reference to tenure, but only where this would address an identified housing need that otherwise would not be met by other types of affordable housing' (para 6)

- 3.3 The new draft sections of PPG3 also suggest a downward revision of the normal threshold of 25 dwellings as the trigger for an affordable housing element:

'Affordable housing should not normally be sought on sites of less than 0.5 hectares or developments of less than 15 dwellings' (para 10)

- 3.4 The new draft allows for lower thresholds where it will help to increase the supply of affordable housing without affecting the general production of market housing.

- 3.5 The present Circular 6/98, like its draft successor, also contains detailed guidance on securing affordable housing, including reference to the need to achieve it in perpetuity (para 16) and provisions for the possibility of commuting off the obligation to provide affordable housing (para 22). The circular goes on to consider a range of more detailed matters including ones where RSLs are and are not involved in the provision of affordable housing.
- 3.6 RPG9 (March 2001), which applies to the South East outside London, notes that 'It is evident from the results of local housing need assessment and also from feedback from employees that there is a strong demand for affordable housing in the South East. Lack of affordable housing can also stimulate unsustainable long distance travel to work patterns if people cannot live near their work or in locations accessible to suitable public transport interchanges. (para 8.7). It goes on to note that affordable housing is 'an important component in the development of mixed and balanced communities' (para 8.9).
- 3.7 Government Office for the South East (GOSE) Regional Priorities states that 'the provision of more affordable housing remains the single most important housing priority in the South East' (para 6.2). It is the most important of the nine identified priorities. The document goes on to say that the problems of those requiring affordable housing have 'worsened significantly over the last few years' (para 6.5).
- 3.8 'Delivering Affordable Housing Through Planning Policy' (DTLR February 2002) is mainly devoted to reviewing current practice. However it contains advice on how practice should be improved. One important statement to this effect is: 'There also needs to be a clear link between the definition of affordable housing, the findings of the housing needs assessment and the resulting emerging planning policy. The definition of local housing costs and income levels is often lost and we believe that it is essential that there is clear benchmarking in the definition of affordability within local authority areas.' (para 14.2.5).
- 3.9 The same report also comments on experience so far:

'In practice we see that the majority of affordable housing provided through the planning system is social housing for rent' (para 2.1.2)

This is relevant, since the Hastings Local Plan formally defines affordable housing as exclusively confined to social rented housing.

The Development Plan framework

- 3.10 The East Sussex and Brighton & Hove Structure Plan 1991-2011 provides the Development Plan framework at County level. The Structure Plan was adopted in 1999 and contains a general policy H4, which requires local plans to establish detailed requirements for affordable housing.
- 3.11 At the Local Level the Hastings Local Plan 2004 provides the policy framework and includes the following policy H6 'Social Rented Housing':-

Policy H6 - Social Rented Housing

The Council will negotiate with developers to secure an element of social rented housing within all suitable residential developments of 15 or more dwellings (or 0.5 or more hectares in size irrespective of the number of dwellings). A minimum of 25% social rented housing will be sought on previously developed (“brownfield”) sites and a minimum of 30% social rented housing on greenfield sites. The following criteria will be taken into account:-

- a) Housing Need**
- b) Suitability, i.e. location, particular costs and other planning objectives.**

Terms Of Provision

Where provision of social rented housing is sought, this will generally be in the form of completed dwellings for transfer to a Registered Social Landlord (RSL) at a cost to reflect normal sources of public subsidy where available, or otherwise at the developer’s expense. The housing provided will be expected to meet the minimum design standards required by the relevant RSL.

Where no social landlord is involved, the Council will impose conditions and/or seek to enter into an agreement to secure the successive occupancy of the dwellings by those in housing need.

The following sites are specifically identified as suitable for an element of social rented housing but others may become available:-

Number or percentage of social rented units sought

BT Centre, Sedlescombe Road North - 25%
Land West of Frederick Road - 30%
Ore Valley - 30%
Mount Pleasant Hospital, Frederick Road - 25%²
St. Helen's Hospital, East of Frederick Road - 3 units¹
Horntye Allotments - 30%
Malmesbury House, West Hill Road - 25%
Eversfield Hospital, West Hill Road - 25%
Land Rear of 248-272 Harold Road - 30%
Land east of Hillside Road - 30%
Land west of Hillside Road - 30%
Former Buchanan Hospital, Springfield Road - 25%
178-182 Bexhill Road - 25%
Former Hollington Park School, Gillsmans Hill - 25%¹
Land at Osborne House, The Ridge - 25%
Harrow Lane Caravan Site - 25%¹
Wishing Tree Nursery - 25%
Cornwallis Street Car Park - 25%
Silverhill Bus Depot - 25%
Hollingsworths Garage, York Road - 25%
Hollingsworths Garage, Braybrooke Road - 25%
Land at Middle Street - 25%
Hastings Station Yard (part) - 30%²
Queens Hotel (part) - 6 units¹
Site of Sussex Chambers, Havelock Road - 25%
The Observer Building (part) - 25%
West St. Leonards (Seaside Road) - 25%²
West St. Leonards (Primary School) - 25%²
Broomgrove Redevelopment Area - 25%²
Taxi Office/BR Social Club, St. Johns Road - 25%
Rear of Linley Drive - 25%
Hurst Court, The Ridge - 25%
Former Stills Factory (part) - 25%²
Holmhurst St. Mary (Excl Harrow Lane Caravan Site) - 30%

¹ INDICATES SITES WHERE A NUMBER OR PERCENTAGE OF AFFORDABLE DWELLINGS HAS ALREADY BEEN AGREED WITH THE DEVELOPER.

² INDICATES SITES FORMING PART OF THE MILLENNIUM COMMUNITY. ON THESE SITES, AN ADDITIONAL 5% OF OTHER TYPES OF AFFORDABLE HOUSING WILL BE PROVIDED IN ADDITION TO 25% SOCIAL RENTED HOUSING.

- 3.14 Policy H6 was considered by the Inspector, who conducted the Hastings Local Plan Inquiry in 2002/3. In his Report, the Inspector indicated his support for the main elements of the Council's policy, in particular the requirement for social rented housing as opposed to other forms of low cost housing; the lower threshold of 15 dwellings; the transfer of completed houses to a Registered Social Landlord and the principle of private developers being asked to contribute financially to the provision of affordable housing. The only recommendation of the Inspector that the Borough Council has not accepted in its entirety is his suggestion of a range of 20% to 30% provision of affordable housing on individual sites. The Council considers that this does not provide sufficient clarity for developers and has adopted a requirement of 25% on brownfield sites and 30% on Greenfield sites.

Formal definition of housing need

- 3.15 For ease of reference the ODPM Guide (2000) definition of housing need is provided here. It is the definition used by the Inspector in concluding that only social rented housing would meet the housing need in Hastings:

'...Housing need refers to households lacking their own housing or living in housing which is inadequate or unsuitable, who are unlikely to be able to meet their needs in the housing market without some assistance.....' [Guide Glossary A2.2]

This links directly to Circular 6/98, which defines affordable housing as being for those who cannot afford market prices or rents for housing.

4. Housing Need and Housing Strategy

Introduction

- 4.1 This section summarises key results from the Housing Needs Survey, and provides details of the Housing Strategy response.

The Housing Needs Survey (HNS) 2001

- 4.2 The HNS was carried out in accordance with the 2000 ODPM (or DETR as it then was) Guide to Housing Needs Assessment. The study shows that there is an annual need for both social rented and market priced dwellings, although not for any extra private rented dwellings. These findings can be summarised as follows:

Table 3.1: Annual requirement for new housing

Dwelling size	Social rented housing	Private rented housing	Market priced housing for sale
1 bedroom	412	0	30
2 bedroom	292	0	80
3 bedroom	45	0	0
4 bedroom	14	0	0
Total	763	0	110

NOTE: THE FIGURES ON THE NEED FOR NEW AFFORDABLE HOUSING (SOCIAL RENTED IN PRACTICE) COME FROM TABLE 10.4 OF THE 2001 HOUSING NEEDS SURVEY BY FORDHAM RESEARCH. THE MARKET PRICED HOUSING FIGURES COME FROM TABLE 11.6.

- 4.3 It can be seen from this table that the predominant need is for social rented housing, although there is a significant market demand for smaller dwellings generated within the Borough. There is no net demand for larger new dwellings generated by local households. This does not prevent applicants from proposing them since in the interest of mixed and balanced communities there is an argument for encouraging incoming households in the market sector, many of whom will seek larger homes.
- 4.4 It should be emphasised that the net annual requirement of 763 dwellings is in no sense a target which the Council must meet. It reflects the scale of the need/demand. The Council's Housing Strategy and Local Plan are, taken together, the Council's response to these problems.

The Housing Strategy

- 4.5 The 'Hastings Housing Strategy 2002 to 2007' provides several pointers to the Council's intentions in addressing the needs/demands outlined above. The Strategy aims of the Council are to achieve 'safe, healthy and sustainable communities'. There is also a major focus on regeneration. Hastings has more than twice the national average proportion of pre-1919 housing.
- 4.6 Hastings is a low income area, and, combined with its relatively large older stock, the Borough has many wards in the top 10% of deprived wards in the country.

Regeneration is therefore a principal theme of the Strategy. House prices in Hastings and St Leonards increased by some 50% in 2002, which was around 20% more than the national average. The housing market is still relatively buoyant but not to the same extent.

- 4.7 The allocated sites in the Local Plan are expected to provide about 2,500 dwellings in the period 2003 to 2011, of which around 458 would be social rented. The Housing Strategy objective is to build approximately 70 new affordable dwellings per annum, assuming the availability of both public sources of funding and developer contributions.
- 4.8 This is of course much less than the scale of the problem as demonstrated in Table 3.1 above. Over the next few years the amount of available Social Housing Grant (SHG) will be very limited and the total amount of affordable housing which can be achieved will therefore depend upon the degree to which affordable housing can be produced without the benefit of SHG.

5. How the System will work

Introduction

- 5.1 This section describes the approach which the Borough proposes to adopt in order to achieve the sorts of target suggested in the previous sections of the SPG. It should be emphasised that, like the planning system in general, the procedures to be described will be applied flexibly, with due account taken of the specific circumstances of the particular site.

Nature of the sites available

- 5.2 The Identified Sites listed in policy H6 on page 9 cover a wide range: they include both 'brownfield' and 'greenfield' sites in differing geographical areas of Hastings. In addition some of the schemes will involve mixed uses.
- 5.3 As a result it is not appropriate to prescribe a single method by which affordable housing should be provided on these sites. Instead, a system of procedures is set out below which will allow all the key stakeholders to understand the principles involved.
- 5.4 Sites of 15 or more dwellings or 0.5 hectares or more in area which are not allocated in the Local Plan for housing purposes, but come forward as a result of the planning process (normally known as 'windfall sites'), will also be required to provide affordable housing in accordance with the principles set out below.

Key principles

- 5.5 These will be set out according to a set of key issues of concern to the stakeholders:

Proportion and nature of affordable housing

- 5.6 Policy H6 makes it clear that affordable housing should be provided in a particular form.

(i) Affordable housing provision should take the form of social rented housing.

- 5.7 Whilst viability is an issue which must be considered, the Council believes that a proportion of 25% social rented affordable housing can be managed on most sites. However, this is not something which can be set out in advance of a planning application. Only then, and in the context of the market situation prevailing at that time, can the viability of a site be properly assessed, and hence the question of whether a given percentage of affordable housing can be achieved.

- 5.8 At the same time, there needs to be a general distinction between brownfield and greenfield sites, since they are likely to be somewhat different in terms of the amount of affordable housing which they can support. Hence the following principle has been adopted :-

- (ii) Brownfield site target: 25%**
(iii) Greenfield site target: 30%

- 5.9 The Council recognises that there are usually a number of costs to be borne by housing development sites, including other developer contributions. The Council has produced a separate SPG on Development Contributions, which is being published at the same time as this SPG. This indicates that the provision of affordable housing will be the Council's first priority after essential on-site and off-site infrastructure.

- 5.10 There may be particular circumstances on individual sites, where applicants consider that there are viability reasons for adopting a lower target than those set out above. Where applicants seek to argue this, it is important to base negotiation upon the facts. Hence a further principle is required:

(iv) Where issues of financial viability are raised by applicants for planning permission, and where Policy H6 applies, planning applications should be accompanied by a current viability analysis of the proposal. Such viability analyses should be in the format shown in Appendix 2.

- 5.11 Viability analyses are capable of showing widely different results, depending on the assumptions used. However it is important to have a starting point. The Council will take advice on the soundness of the viability analysis prior to negotiating upon the level of affordable housing to be sought. Where it has been satisfactorily demonstrated that in viability terms the percentages in principle (ii) or (iii) cannot be met, the Council will negotiate with the applicant to decide the proportion of social rented housing to be provided.

Funding of affordable housing

5.12 It is evident from the Housing Strategy that the Council, in association with the Housing Corporation, cannot fund all of the affordable housing proposed in the Plan. As a result the bulk of the affordable housing will be provided without SHG. This is now becoming accepted practice, and is emerging Government policy: it is part of the proposals in the July 2003 draft PPG3.

5.13 In terms of the price which the RSL's will pay for the affordable housing, this will be based on the income stream generated by the housing:-

(v) The price paid for the affordable housing by the nominated RSL will depend on the rental income stream forecast for the housing

5.14 In exceptional circumstances the Council will accept a payment 'in lieu' instead of completed units. This will only be appropriate where the local planning authority and the developer both consider that, for particular sites where a requirement for an element of social rented housing would be appropriate, it is none the less preferable that a financial contribution should be made towards the provision of the element of social rented housing on another site or towards securing the bringing back of existing housing into active use. The Council will give priority for the expenditure of any payments 'in lieu' to the Central St Leonards Housing Renewal Area. The amount of the payment will be calculated on the basis of the Housing Corporation's total cost indicator for the development of the units minus the amount that a housing association could contribute against the rental income stream.

6. Matters of Detail

Introduction

6.1 This section addresses various other circumstances associated with the provision of affordable housing under Policy H6.

Technical issues

6.2 The list includes a wide variety of factors:-

S106 Agreement

6.3 It will be necessary to formalise the negotiated amounts of affordable housing through a Section 106 Agreement. Government guidance also allows for the possibility of doing this by planning condition, but this is normally impossible due to the complexity of the requirements associated with affordable housing. Example clauses for a S106 agreement are provided in Section 6 of this SPG. Issues may in some cases arise over whether completed dwellings are provided freehold or leasehold. The Council's preference is for freehold, but a leasehold transfer to an RSL may be accepted where this is a desirable part of an overall package.

Involvement of RSLs

- 6.4 Since affordable housing will be social rented housing, the only appropriate landlord for it will be an RSL. The Council's list of partner RSLs is provided as Appendix 1. In discussion with the Housing Corporation and the partner RSLs the Council will nominate one or more RSL's to particular developments as they reach the planning applications stage. Developers are encouraged to make contact with the appropriate officers of the Council at the earliest opportunity. A list of contacts in the Housing and Planning Departments is included in Appendix 3.

Nomination agreements

- 6.5 In addition to the S106 legal agreement there will always be a Nomination Agreement specifying the size and location of the social rented housing (and of the shared ownership housing on sites where that is agreed). This does not add to what is already in the S106 Agreement.

Design Standards

- 6.6 The Council emphasise the need for quality design which fully integrates affordable housing into the overall development, using 'pepper potting' where appropriate. Developers are encouraged to discuss their housing layouts with the planning authority and the partner RSL at the earliest opportunity. The housing should be constructed, to a high standard which at least meets the provision of the Housing Corporation's Scheme Development Standards, latest edition, and Lifetime Homes Standards (Joseph Rowntree Foundation).

Updating market and needs assessment

- 6.7 The Council will from time to time provide updates of the market and affordable housing assessments, in order to provide up to date as well as robust evidence. This will ensure that any future changes to the existing policy are based on current evidence.

7. Examples of S106 Clauses related to Affordable Housing

Outline Application

1. To provide **25% (brownfield sites) or 30% (greenfield sites)** of the total number of dwelling units as affordable housing and to make such units available to a Registered Social Landlord (SRL), agreed by the Council from its list of partner SRLs, prior to the occupation of two thirds of the dwellings on the site, in accordance with Policy RH13 of the Hastings Borough Plan 1993 and Policy H6 of the proposed modifications to the Draft Hastings Local Plan 2003.

Where name of registered social landlord is known

2. Prior to the occupation of the **(insert number)** dwellings at the development, the owner shall provide and make available to **(insert name of Registered Social Landlord (RSL))** a total of affordable housing units in accordance with Policy

Where name of RSL is not known

3. Prior to the occupation of the **(insert number)** dwellings at the development, the owner shall make available to an RSL agreed by the Council from its list of partner RSLs, a total of affordable housing units in accordance with Policy RH13 of the Hastings Borough Plan 1993 and Policy H6 of the proposed Modifications to the Draft Hastings local Plan 2003.
4. The accommodation to be provided shall comprise the following :(details to be agreed with the Council for each individual development)

General

5. The owner shall construct the units to meet Housing Corporation Scheme Development Standards latest edition.
6. The owner undertakes to transfer the units to the RSL for a sum of £..... (where known) OR for a sum based on the RSL's ability to borrow against its projected rental stream from the completed dwellings.
7. The units shall be dispersed within the development in accordance with the details submitted to and approved by the Council at the detailed planning application or reserved matters stage.
8. The units shall be made available for a period of two years from completion of the final units provided that if no RSL is willing to accept some or all of the units for affordable housing then this obligation will cease to have effect in relation to those units and the owner shall be released from this obligation and will be able to sell the units on the open market.

Appendix 1: The Council's partner Registered Social Landlords (as at May 2004)

Amicus Group

Horizon Housing Group

Moat Housing Group

Orbit HA

Places for People (North British Housing)

Hyde HA (Chichester Diocese Housing Association)

Appendix 2: Viability Analysis Format

In Chapter 4 the issue of where a site cannot afford affordable housing is discussed. Principle (iv) requires that applicants who wish to argue this should provide viability analyses to support their claim.

This appendix sets out the format in which such analyses should be provided. There are many proprietary formats in existence, while smaller house builders may not have any formal system of viability analysis. Nevertheless, the Council has a duty to examine the specifics of the case, if it is to waive the general requirements of Policy H6 of the Local Plan.

In order to ensure that the content of the viability analysis is acceptable, and yet allow for the variations of approach which are bound to exist within the group of developers likely to be applying for planning permission, the following format sets out only the basic requirements.

Any viability analysis should contain the following key elements:

Value of the development

All scheme costs excluding land

Residual land value

The Council will expect to see workings that lie behind these major components, but the format in which these are presented is left to the applicant. Where the details are not sufficiently clear as to allow checking, further detail will be sought.

Financial viability example

Site of 40 dwellings on 1.0 ha (2.47 acres) of previously used land

Market dwellings: 30

Affordable housing: 10 (*social rented units, to be provided with zero SHG*)

Sales

Market Housing - £5,130,000

Affordable Housing - £360,000

Total - £5,490,000

Construction costs

Build costs - £2,154,000

Contingency - £86,160

Demolition/land remediation - £225,000

Road & site works - £350,000

Planning gain contributions - £275,000

Professional fees - £235,217

Total - £3,325,377

Purchase & disposal costs

Stamp duty - £33,487

Acquisition agent & legal - £12,558

Town planning & survey - £40,000

Sales agent & legal - £192,150

Total - £278,195

Finance - £225,748

Developer's profit 15% on Value - £823,500

Residual site value (1.0 ha) - £837,180

This equates to some £338.9k per acre. Taking into account demolition/remediation costs, necessary road/site works, and appropriate planning gain contributions, this significantly exceeds the value of the site in any feasible alternative use.

The residential development is therefore clearly viable with the required affordable housing contribution.

Appendix 3: Contacts at Hastings Borough Council (as at May 2004)

Housing:

Mike Millington
Housing Policy and Resources Manager
Telephone : 01424 781316
Email: mmillington@hastings.gov.uk

Planning:

Richard Wilson
Development Control Manager
Telephone – 01424 783250
Email: rwilson@hastings.gov.uk