



**First Homes  
Consultation on the design and delivery of First Homes**

*G15 response*

## About the G15

The G15 is the group of London’s largest housing associations. Our members house one in ten Londoners and own or manage more than 600,000 homes across the country. We’re independent, charitable organisations and all the money we make is reinvested in building more affordable homes and delivering services for our residents. Each G15 member is different, but we’re all striving towards the same goal – to solve the capital’s housing crisis and improve the lives of Londoners.

<https://g15.london/>

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## Summary

### Meeting housing need

Low cost homeownership (LCHO) is an important affordable housing product. The G15 – and all housing associations – exist to meet housing need, and housing need comes in many forms. Everyone needs an affordable home. We are, therefore, supportive of the government's ambition to give more people access to homeownership.

First Homes, if implemented in a way that is complimentary to existing LCHO products that have a record of delivery, can be a policy that supports this shared ambition. If government desires to deliver homes for owner-occupation at a discount to help first-time buyers into homeownership, then we are supportive of this ambition.

However, the indisputably greatest need is for low rent homes. There are [1.15m households](#) on waiting lists for social housing (244,000 in London), and [over eight million](#) individuals in housing need due to overcrowded, unaffordable, or unsuitable accommodation. Helping those on the fringes of homeownership will do little to help those who need help the most. **First Homes must be delivered in a way that does not reduce the supply of low rent homes.**

It is also worth mentioning that at this time of great economic uncertainty, people are much less likely to want to purchase a home as a significant commitment, considering that lots of people might end up on low/no/uncertain incomes following the covid19 pandemic. This might not be the right time to introduce significant disruption into the housing market and increase the proportion of homes which are for sale, thus increasing risk. Therefore, we believe that government should take some time to assess market responses and maybe pilot some of the approaches to check they work first.

Furthermore, the G15 already offers shared ownership, a popular LCHO product. This is targeted at people who cannot afford to buy a home on the open market, but want the benefits of homeownership, including an equity stake and rights to adapt their home.

Analysis by the G15 presented in and attached to this document shows that in London, shared ownership is cheaper in terms of deposit requirement. It also provides a source of cross-subsidy for housing associations to reinvest money in delivering more affordable housing. In London, relative to shared ownership, First Homes require more subsidy and are less affordable. As such, **First Homes must be delivered in a way that does not reduce the supply of shared ownership homes.**

The government has, through the 2019 consultation and proposed national model, recognised the importance of encouraging private investment to the shared ownership market and has helped to bring significant funding and investment forward. Therefore, the prospect of removing approximately 50% of the current supply route to the market by using Section 106 to deliver of First Homes is of great concern. This action will, most likely, reduce appetite for investment in shared ownership and stifle the ability for the product to grow, innovate and improve on the customer offer. The proposal to bring an additional product to the market (First Homes) without the consequence of contracting existing affordable product viability and supply is highly unlikely. Private investors want to grow existing products and this proposal will impact that desire.

The introduction of First Homes will most likely funnel lender appetite away from the shared ownership mortgage market, which has been carefully developed by housing associations and government working with lenders over the last decade. We currently have a well-functioning lending market ensuring choice and access to products for the wide range of customers that seek assistance

through shared ownership. Stifling the growth of shared ownership would reduce choice and exclude some customers from the market.

The proposal to nationally replace some or all Section 106 (s106) homes with First Homes, therefore, is of significant concern to G15 members. There is a need for both low rent homes and shared ownership homes – in London and nationwide – and both are a more effective use of developer subsidy.

The other proposed mechanism for delivery – exception sites – cannot deliver First Homes at any significant volume in London. Data is not captured on how many homes are currently delivered on exception sites in London, but discussions with G15 members and the GLA suggest it is a tiny number.

To deliver First Homes, we propose a delivery mechanism not mentioned in the consultation document: small sites, with a particular emphasis on the London market. Despite London being the urban centre of England, with most suitable locations for housing already built on to some extent, just [30%](#) of London's new build housing is built on sites of less than .25 hectares. This is because it is harder to make small sites viable, thanks to some fixed costs of construction and greater limitations on what can be built. If more small sites were made viable, and these were made the main delivery mechanism for First Homes in London, First Homes could be delivered in a way that not only does not displace other affordable housing, but also may be truly additional housing supply.

To increase the volume of First Homes (and homes) delivered on small sites in London, government could consider giving small sites with at least 40% of their homes as First Homes advantages in planning, for example:

- Permission in principle
- Fast tracked planning
- A Community Infrastructure Levy (CIL) exemption.

This way First Homes could be delivered in a way that not only does not significantly encroach on other types of affordable housing but may deliver additional affordability and additional homes overall.

### **Overall supply**

If some or all s106 homes are replaced with First Homes, we foresee increased difficulty with delivering the 300,000 homes a year that we and government accept England needs to deliver in order to reduce the housing shortage.

- As the [Letwin Review](#) and recent analysis by [Lichfields](#) both found, absorption rates are a major barrier to increasing the rate at which new homes are delivered. If sites contain only homes for sale, oligopolistic developers can only build them at a rate that means prices will not fall. Diversifying the tenures included in a site by including low rent homes mitigates this issue and gets homes built faster.
- If most developers include First Homes on their sites, it will make their market sale homes less desirable and harder to sell. This will compound the already significant sales risk and the problem of absorption rates.
- There is likely to be greater community consent for building genuinely affordable housing, so councils and residents will object more readily at planning stage for blocks with only First Homes and market housing. This will make more schemes stall or fail at planning and will reduce the number of homes delivered. They may not object ostensibly on the grounds that the homes are First Homes but could use other reasons.

By moving away from delivery via s106 in London, and instead delivering First Homes on small sites with planning advantages, we will not see any of the above problems to overall supply but may instead see additional homes which help government reach its target of 300,000 new homes a year.

## Ensuring First Homes are affordable

*1a: Do you agree with a minimum discount of 30% (but with local flexibility to set a higher one)?*

There is a trade-off between affordability and effective subsidy. The greater the discount on First Homes, the greater the effective subsidy, the more the provision of First Homes will displace the supply of other affordable housing tenures if delivered via s106 (which we oppose), and the more the provision of First Homes could hurt viability if delivered by other means.

Although there is a clear temptation to set a higher discount in areas of worse affordability like London, there is also a greater need for submarket rented homes in these areas, and a greater need for more supply of housing. Furthermore, modelling undertaken by the G15 shows that even at a higher discount of 40%, in London deposits requirements for First Homes are more than twice as high as what required for buying a 25% share of a shared ownership home (which would cost less in effective subsidy). See Appendix 1a.

For this reason, where local authorities wish to set higher discounts, they should have an evidenced reason included in an approved Local Plan in order to be able to do so.

*1b: If not, what should the minimum discount be?*

As above.

*2a: Should we set a single, nationally defined price cap rather than centrally dictate local/regional price caps?*

In London the price cap could mirror the Help to Buy price cap of £600,000.

*2b: If yes, what is the appropriate level to set this cap?*

As above.

*3a: If you disagree with a national price cap, should central government set price caps which vary by region instead?*

As above.

*3b: If price caps should be set by the government, what is the best approach to these regional caps?*

As above.

*4: Do you agree that, within any central price caps, local authorities should be able to impose their own caps to reflect their local housing market?*

As above.

## Eligibility for the First Homes scheme

*5: Do you agree that local authorities are best placed to decide upon the detail of local connection restrictions on First Homes?*

Yes, but there should be guidelines in place. In London, borough boundaries often are not an indication of how easy a commute is. Buyers of First Homes should absolutely be able to purchase a home within commuting distance to where they work, even if this is not the local authority area they currently live in.

*6: When should local connection restrictions fall away if a buyer for a First Home cannot be found?*

Three months seems appropriate. However, there must be a process in place that makes this ungameable.

*7: In which circumstances should the first-time buyer prioritisation be waived?*

There is significant room for developers to game the system if it is too easy to remove the priority for first-time buyers. We consider the First Time buyer prioritisation of greater importance than the local area connection prioritisation. Circumstances where this can be waved ought to be very limited.

*8a: Should there be a national income cap for purchasers of First Homes?*

There should be an income cap, but not a national one. In London, the cap should be set regionally, at a level that ensures First Homes are sold to people who would struggle to afford a home on the open market. This cap should be reviewed annually.

*8b: If yes, at what level should the cap be set?*

As above. In London the Mayor of London should have responsibility for setting the cap at a level such that the beneficiaries of First Homes are those first-time buyers who couldn't otherwise buy a home on the open market.

*8c: Do you agree that local authorities should have the ability to consider people's income and assets when needed to target First Homes?*

*9: Are there any other eligibility restrictions which should apply to the First Homes scheme?*

## **Supporting the First Homes scheme**

*10a: Are local authorities best placed to oversee that discounts on First Homes are offered in perpetuity?*

As the local authority has no ongoing relationship with the occupants of a First Home, ensuring the home retains its discount once resold may better sit elsewhere.

*10b: If no, why?*

As above.

*11: How can First Homes and oversight of restrictive covenants be managed as part of local authorities' existing affordable homes administration service?*

## **Supporting competitive mortgage lending**

*13: Do you agree that we should develop a standardised First Home model with local discretion in appropriate areas to support mortgage lending?*

Yes. However, even with this in place, we may find mortgage lenders still unwilling to offer competitive rates due to the diverse range of LCHO products on the market and First Homes being the most novel among them.

*14: Do you agree that it is appropriate to include a mortgagee protection clause to provide additional assurance to lenders?*

This would need to be developed in a way that could not be gamed. Furthermore, there is a trade-off between making mortgage rates competitive and ensuring that the homes stay discounted in perpetuity.

## **Restrictions on letting on First Homes**

*15: For how long should people be able to move out of their First Home and let it out without seeking permission from the local authority?*

Up to 90 days. This mirrors the Mayor of London's restrictions on AirBnb lets. A limit of six months would enable the buyer to let out the home on a standard assured shorthold tenancy. This would allow First Homes to be used as buy-to-let properties, bought by parents in children's names.

Local authorities should always grant permission for longer periods of letting out First Homes where there is an evidenced reason – for example, where the buyer is moving elsewhere temporarily for work.

*16: Under what circumstances should households be able to move out of their First Home and let it for a longer time period?*

All the reasons specified in the consultation document are appropriate reasons for buyers to temporarily let out their home, so long as evidence is provided.

## **Delivering the Armed Forces Covenant**

*17: Do you agree that serving members and recent veterans of the armed forces should be able to purchase a First Home in the location of their choice without having to meet local connections criteria?*

Yes.

*18: What is the appropriate length of time after leaving the Armed Forces for which veterans should be eligible for this exemption?*

Five years seems appropriate.

*19: Are there any other ways we can support members of the Armed Forces and recent veterans in their ability to benefit from the First Homes scheme?*

## **Delivering First Homes**

*20: Which mechanism is most appropriate to deliver First Homes?*

Planning policy changes should be sufficient without the need for new primary legislation.

*21: Which do you think is the most appropriate way to deliver First Homes?*

A national policy of replacing some or all s106 with First Homes would not be effective. As much as half of the national target for affordable homes is delivered via s106, and delivering First Homes in this way – especially if there is a nationally prescribed proportion of s106 to become First Home delivery – would displace other tenures that are either far more necessary (like low rent homes) or far better value for money (shared ownership).

Modelling attached in Appendix 1b shows that in London First Homes are less affordable than shared ownership in terms of deposit required, which is a major barrier for accessing homeownership. Furthermore, shared ownership homes provide cross-subsidy to housing associations for reinvestment in affordable homes for those in housing need, whereas First Homes only provide subsidy to the occupiers.

For this reason, any delivery mechanism that forces First Homes to be built rather than other affordable tenures simply does not make sense.

Furthermore, modelling in Appendix 2a shows that replacing 40% of s106 homes – the lowest of the scenarios posed in the consultation document – the G15 would deliver 1,800 fewer affordable homes of other tenures each year, including 880 fewer shared ownership homes annually.

First Homes should be delivered in a way that does not displace other affordable housing. Only this way will they truly help alleviate the housing crisis. We believe small sites are a way to do this in London, as discussed below.

*22: What is the appropriate level of ambition for First Home delivery?*

As above.

*23: Do you agree with the proposals to amend the entry-level exception site policy to a more focused and ambitious First Homes exception site policy?*

In London, there are so few exception sites that they won't be able to deliver First Homes at scale. As London is so land constrained, almost anywhere that is suitable for housing can be used for it. The only exceptions are designated Green Belt, Metropolitan Open Land and Strategic Industrial Land which would fall outside the exceptions anyway.

*24: Do you think there are rare circumstances where local authorities should have the flexibility to pursue other forms of affordable housing on entry-level exception sites, because otherwise the site would be unviable?*

As above.

*25: What more could the government do to encourage the use of the existing rural exception site policy?*

*26: What further steps could the government take to boost First Home delivery?*

If government desires to deliver First Homes at any scale in London, small sites should be used.

Analysis of the London Development Database reveals that since 2012 sites no larger than .25 hectares constitute 30% of homebuilding and 30% of affordable homebuilding in London. That so few homes are delivered on small sites – which intuitively ought to make up a larger proportion of supply, given that London is largely already built on – shows that there exists a large potential to deliver on small sites that are currently not viable. This excess potential, if realised, would be additional, both in terms of overall housing supply and in terms of affordable additionality (loosely defined as the savings to households occupying these homes relative to the market cost of doing so).

Small sites could be the main delivery mechanism for First Homes in London. Government should consider steps to bring forward small sites for First Home development, for example

- Permission in principle
- Fast tracked planning
- A Community Infrastructure Levy (CIL) exemption

for sites of .25 hectares or less which have at least 40% of their homes as First Homes.

## **Community Infrastructure Levy exemptions**

*27: Do you agree that the proposal to exempt First Homes from the Community Infrastructure Levy would increase the delivery of these homes?*

To accelerate the development of small sites in London, sites with over 40% of units as First Homes should be exempt from CIL. But in other cases, exempting developments providing First Homes from CIL would unduly impact the provision of genuinely affordable housing as well as vital infrastructure.

*28: Do you think the government should take steps to prevent Community Infrastructure Levy rates being set at a level which would reduce the level of affordable housing delivered through section 106 obligations?*

Yes.

## **Equality impact First Homes scheme**

*29a: What equality impacts do you think the First Homes scheme will have on protected groups?*

The consultation document states that delivery analysis undertaken by the department shows that First Homes will have a positive impact on women and on BAME people. We note that our Freedom of Information request (5159517) asking to see this delivery analysis was denied, using this reasoning:

“We consider that section 35(1)(a) (information relating to the formulation and development of government policy) and Section 22 to provide information that is intended for future publication is engaged. Information falling within these exemptions must, however, still be disclosed unless the public interest served by doing so is outweighed by that served by maintaining it. The public interest considerations relate to the protection of thinking space and the ability to have full and frank internal discussions without concern that the information will be disclosed. It is right that the Government should consider Government policy in an open way and be able to demonstrate transparency in how personnel are engaged.”

It is curious that a delivery analysis undertaken for an Equality Impact Assessment can be characterised as a “full and frank internal discussion” while simultaneously being intended for future publication, which is the headline reason the request was denied.

We suggest that women and BAME people tend to depend more on social housing than other sections of the population, so we consider the proposals to replace much of s106 affordable housing with low cost homeownership to be disproportionately detrimental to these groups.

*29b: What steps can the government take through other programmes to minimise the impact on protected groups?*

To minimise the impact on protected groups, the government should abandon its proposal to nationally replace some or all s106 homes with First Homes.

*30: Do you have any other comments on the First Homes scheme?*

Whatever requirements or guidelines government arrives at on the provision of First Homes, we emphatically ask that housing association-led schemes are exempted. Housing associations exist to meet housing need, schemes we develop seek to maximise affordable housing rather than minimise it. This is why we are exempted from CIL, and an exemption from delivering First Homes makes sense for the same reason.

## **Appendix 1a: Affordability of First Homes relative to shared ownership in London**

Affordability of shared ownership and First Homes in London to the median earner, assuming

- Deposit: 5% of the initial shared ownership share and 5% of First Homes property value after discount
- An initial shared ownership share of 25%
- A 40% First Homes discount
- A mortgage Loan to Value ratio of 95% and a 25-year mortgage.

Deposit requirements as a percentage of median earnings are green if the deposit amount is less than 20% of annual gross earnings and they progressively move towards red as the amount of deposit required as a proportion of median earnings goes up, indicating whether or not the buyer is likely to be able to afford the home with a 5% deposit.

We attach a calculator tool with our response – Appendix 1b – that allows these assumptions to be changed.

Area	Median Earnings (Apr 2019)	Median House Prices (June 2019)	SO (X% Share)	FH (X% Discount)	Mortgage Value SO 25 (LtV 95%, 25 years)	Mortgage Value FH 20 (LtV 95%, 25 years)	SO Deposit requirement (% earnings)	FH Deposit requirement (% earnings)
<b>London</b>	<b>38,992</b>	<b>467,940</b>	<b>116,985</b>	<b>280,764</b>	<b>111,136</b>	<b>266,726</b>	<b>15.00%</b>	<b>36.00%</b>
<b>Inner London</b>	<b>42,667</b>	<b>595,934</b>	<b>148,984</b>	<b>357,561</b>	<b>141,534</b>	<b>339,683</b>	<b>17.46%</b>	<b>41.90%</b>
Camden	40,196	690,000	172,500	414,000	163,875	393,300	21.46%	51.50%
City of London	61,636	923,080	230,770	553,848	219,232	526,156	18.72%	44.93%
Hackney	35,020	495,000	123,750	297,000	117,563	282,150	17.67%	42.40%
Hammersmith and Fulham	37,990	625,000	156,250	375,000	148,438	356,250	20.56%	49.36%
Haringey	30,452	443,000	110,750	265,800	105,213	252,510	18.18%	43.64%
Islington	41,076	545,000	136,250	327,000	129,438	310,650	16.59%	39.80%
Kensington and Chelsea	33,000	1,015,000	253,750	609,000	241,063	578,550	38.45%	92.27%
Lambeth	36,825	463,000	115,750	277,800	109,963	263,910	15.72%	37.72%
Lewisham	32,334	375,000	93,750	225,000	89,063	213,750	14.50%	34.79%
Newham	33,944	396,500	99,125	237,900	94,169	226,005	14.60%	35.04%
Southwark	40,303	510,000	127,500	306,000	121,125	290,700	15.82%	37.96%
Tower Hamlets	46,142	470,000	117,500	282,000	111,625	267,900	12.73%	30.56%
Wandsworth	34,168	532,500	133,125	319,500	126,469	303,525	19.48%	46.75%
Westminster	43,556	860,000	215,000	516,000	204,250	490,200	24.68%	59.23%
<b>Outer London</b>	<b>32,741</b>	<b>339,946</b>	<b>84,986</b>	<b>203,967</b>	<b>80,737</b>	<b>193,769</b>	<b>12.98%</b>	<b>31.15%</b>
Barking and Dagenham	28,738	242,770	60,693	145,662	57,658	138,379	10.56%	25.34%
Barnet	31,624	415,000	103,750	249,000	98,563	236,550	16.40%	39.37%
Bexley	31,642	242,000	60,500	145,200	57,475	137,940	9.56%	22.94%
Brent	31,739	413,750	103,438	248,250	98,266	235,838	16.30%	39.11%
Bromley	30,762	325,000	81,250	195,000	77,188	185,250	13.21%	31.69%

Croydon	35,237	285,750	71,438	171,450	67,866	162,878	10.14%	24.33%
Ealing	31,021	410,500	102,625	246,300	97,494	233,985	16.54%	39.70%
Enfield	28,258	290,500	72,625	174,300	68,994	165,585	12.85%	30.84%
Greenwich	33,081	443,900	110,975	266,340	105,426	253,023	16.77%	40.26%
Harrow	32,809	361,000	90,250	216,600	85,738	205,770	13.75%	33.01%
Havering	32,321	261,500	65,375	156,900	62,106	149,055	10.11%	24.27%
Hillingdon	35,231	300,000	75,000	180,000	71,250	171,000	10.64%	25.55%
Hounslow	36,487	342,500	85,625	205,500	81,344	195,225	11.73%	28.16%
Kingston upon Thames	32,138	380,000	95,000	228,000	90,250	216,600	14.78%	35.47%
Merton	31,699	370,000	92,500	222,000	87,875	210,900	14.59%	35.02%
Redbridge	29,108	296,300	74,075	177,780	70,371	168,891	12.72%	30.54%
Richmond upon Thames	35,191	431,000	107,750	258,600	102,363	245,670	15.31%	36.74%
Sutton	32,947	275,000	68,750	165,000	65,313	156,750	10.43%	25.04%
Waltham Forest	30,718	372,500	93,125	223,500	88,469	212,325	15.16%	36.38%

**Appendix 2a: Displacement of G15-supplied affordable housing if First Homes replaced 40% of s106.**

	Conventional affordable G15 s106 starts in 2018/19			Conventional affordable G15 s106 starts if FHs were to constitute 40% of s106 delivery			Reduction in conventional affordable G15 s106 starts if FHs were to constitute 40% of s106 delivery		
	London	Regions	Total	London	Regions	Total	London	Regions	Total
<b>Affordable Rent</b>	179	1,228	<b>1,407</b>	107	737	<b>844</b>	72	491	<b>563</b>
<b>Intermediate Rent</b>	0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>London Affordable Rent</b>	620	0	<b>620</b>	372	0	<b>372</b>	248	0	<b>248</b>
<b>London Living Rent</b>	0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Shared Ownership</b>	1,102	1,099	<b>2,201</b>	661	659	<b>1,321</b>	441	440	<b>880</b>
<b>Social Rent</b>	26	282	<b>308</b>	16	169	<b>185</b>	10	113	<b>123</b>
<b>Supported and Specialist Housing</b>	0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Total</b>	<b>1,927</b>	<b>2,609</b>	<b>4,536</b>	<b>1,156</b>	<b>1,565</b>	<b>2,722</b>	<b>771</b>	<b>1,044</b>	<b>1,814</b>

This analysis assumes all affordable tenures are displaced proportionally by First Homes.

**Appendix 2b: Displacement of G15-supplied affordable housing if First Homes replaced 60% of s106.**

	Conventional affordable G15 s106 starts in 2018/19			Conventional affordable G15 s106 starts if FHs were to constitute 60% of s106 delivery			Reduction in conventional affordable G15 s106 starts if FHs were to constitute 60% of s106 delivery		
	London	Regions	Total	London	Regions	Total	London	Regions	Total
<b>Affordable Rent</b>	179	1,228	<b>1,407</b>	72	491	<b>563</b>	107	737	<b>844</b>
<b>Intermediate Rent</b>	0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>London Affordable Rent</b>	620	0	<b>620</b>	248	0	<b>248</b>	372	0	<b>372</b>
<b>London Living Rent</b>	0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Shared Ownership</b>	1,102	1,099	<b>2,201</b>	441	440	<b>880</b>	661	659	<b>1,321</b>
<b>Social Rent</b>	26	282	<b>308</b>	10	113	<b>123</b>	16	169	<b>185</b>
<b>Supported and Specialist Housing</b>	0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Total</b>	<b>1,927</b>	<b>2,609</b>	<b>4,536</b>	<b>771</b>	<b>1,044</b>	<b>1,814</b>	<b>1,156</b>	<b>1,565</b>	<b>2,722</b>

This analysis assumes all affordable tenures are displaced proportionally by First Homes.

**Appendix 2c: Displacement of G15-supplied affordable housing if First Homes replaced 80% of s106.**

	Conventional affordable G15 s106 starts in 2018/19			Conventional affordable G15 s106 starts if FHs were to constitute 80% of s106 delivery			Reduction in conventional affordable G15 s106 starts if FHs were to constitute 80% of s106 delivery		
	London	Regions	Total	London	Regions	Total	London	Regions	Total
<b>Affordable Rent</b>	179	1,228	<b>1,407</b>	36	246	<b>281</b>	143	982	<b>1,126</b>
<b>Intermediate Rent</b>	0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>London Affordable Rent</b>	620	0	<b>620</b>	124	0	<b>124</b>	496	0	<b>496</b>
<b>London Living Rent</b>	0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Shared Ownership</b>	1,102	1,099	<b>2,201</b>	220	220	<b>440</b>	882	879	<b>1,761</b>
<b>Social Rent</b>	26	282	<b>308</b>	5	56	<b>62</b>	21	226	<b>246</b>
<b>Supported and Specialist Housing</b>	0	0	<b>0</b>	0	0	<b>0</b>	0	0	<b>0</b>
<b>Total</b>	<b>1,927</b>	<b>2,609</b>	<b>4,536</b>	<b>385</b>	<b>522</b>	<b>907</b>	<b>1,542</b>	<b>2,087</b>	<b>3,629</b>

This analysis assumes all affordable tenures are displaced proportionally by First Homes.

For more information, please contact:

**Reuben Young**

Network Homes

07399606475

[reuben.young@networkhomes.org.uk](mailto:reuben.young@networkhomes.org.uk)