100 Chalk Farm Road

Affordable Housing Statement Report

Prepared by

Submitted on behalf of Regal Chalk Farm Ltd

January 2024

Affordable Housing Statement 100 Chalk Farm Road, London, NW1 8EH

On behalf of: Regal Chalk Farm Limited

January 2024 Ref: U0017898/JBR/FKI/JWTL





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1 INTRODUCTION AND INSTRUCTIONS

- 1.1 This Affordable Housing Statement ('AHS') has been prepared by Gerald Eve LLP on behalf of Regal Chalk Farm Ltd, ("the Applicant") in support of a full planning application ("the Application") for 100 Chalk Farm Road, London, NW1 8EH ("the Site") within the London Borough of Camden ('LBC').
- A listed building consent application accompanies the application for works to the adjacent Roundhouse, which is a Grade II* listed building.
- 1.3 The site is located on the south-western side of Chalk Farm Road and borders the mainline railway into Euston, with the Juniper Crescent Housing Estate to the south. It lies within the Regents Canal Conservation Area, to which the existing building on the site is a neutral contributor. To the west, the site is adjacent to the Grade II* listed Roundhouse theatre and live music venue. Beyond that, to the north-west is Chalk Farm Underground Station. To the east is the Petrol Filling Station site, which forms part of the Camden Goods Yard development and is currently in use as a temporary supermarket.
- 1.4 The remainder of this report is set out as follows:
 - 2) The Proposed Scheme
 - 3) Local Planning Context: Affordable Housing
 - 4) Registered Provider Engagement and Consultation
 - 5) Financial Viability and Overall Affordable Housing Proposal
 - 6) Detailed Affordable Housing Proposal: Tenure and Mix of Units
 - 7) Detailed Affordable Housing Proposal: Rental Levels and Affordability
 - 8) Concluding Statement

2 THE PROPOSED SCHEME

Introduction

2.1 A detailed description of the Site and its surroundings is contained within the Planning Statement. A summary of the background, location and planning proposals is therefore provided in the section below.

Background

- 2.2 The site consists of three 1970s commercial buildings: the main six-storey office building fronting Chalk Farm Road; a two-storey link building which adjoins the Roundhouse; and a three-storey office building to the rear of the site. There are surface and subterranean car parks at the rear.
- 2.3 The location of the site is just east of the Grade II* entertainment venue, the Roundhouse, on the south side of Chalk Farm Road. The former Morrison's gas station (PFS) to the west is undergoing renovations that include the construction of a six-story commercial complex. This development is a component of the larger Camden Goods Yard project. The Site has frontage on two sides and is being supplied with a youth space as part of the PFS design.
- 2.4 A surface level railway line (mainline rail to Euston) borders the site to the rear, and a retaining wall measuring about three metres runs the length of the site's back boundary. The Juniper Crescent Housing Estate is located beyond that. The topography of the land slopes sharply upward from Chalk Farm Road to the retaining railway wall; the elevation difference is roughly 4.5 metres, and there is not any level access from Chalk Farm Road to the current structures.
- 2.5 Chalk Farm Road has an impressive commercial character at the ground floor level and a residential character above, indicating the mixed-use nature of the area. Aside from the Roundhouse itself, there have been recent approvals surrounding Chalk Farm Station and expansions along Regent's Park Road.

The Application

2.6 The Application, description of development proposes:

"Demolition of existing buildings and redevelopment of the site to provide two buildings containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), affordable residential homes (Class C3), ground floor commercial space (Class E) together with public realm, access, servicing, and other associated works."

2.7 Full details and scope of the planning application is described in the submitted Town Planning Statement, prepared by Gerald Eve LLP

Land Use

2.8 The land uses proposed as part of the redevelopment are set out in the following table.

Floor Areas	Floorspace m	² (GIA)	
Land Use (Use Class)	Existing Floorspace sqm (GIA)	Proposed Floorspace sqm (GIA)	Net change (Existing to Proposed) sqm (GIA)
Office	3,433	-	-3,433
Purpose Built Student Accommodation (Sui Generis)	-	9,474	+9,474
Commercial (Class E)	-	824	+824
Affordable Residential (Class C3)	-	2,765	+2,765
Total	3,433	13,063	+9,630

Table 1: Proposed Land Uses

Source: Applicant

2.9 The residential floorspace will be provided in a separate block to the student housing. The residential housing building will comprise of 9 floors. It will be delivered as 100% affordable housing which

equates to 23% of the total 35% affordable provision when including Affordable Student Accommodation (in floorspace and habitable rooms).

- 2.10 The affordable housing provision equates to 24 affordable housing units equating to 78 habitable rooms.
- 2.11 A summary of the unit breakdown within the block is provided in the following table.

Table 2: Affordable Residential Summary

Unit Type	Total Number of Units	NIA (sq ft)	Unit Type Percentage Breakdown %	Habitable Rooms
1B / 2P	6	3,423	25	12
2B/4P	12	9,042	50	36
3B / 5P	6	6,071	25	30
Total	24	18,535	100%	78

Source: Applicant

3 PLANNING CONTEXT – AFFORDABLE HOUSING

Introduction

- 3.1 This section provides an overview of key planning policies associated at national, regional and local level including an overview of the planning background relating to the Application. Additional reference should be made to the National Planning Policy Framework ('NPPF'), the Planning Practice Guidance ('PPG'), the London Plan, the Mayor's Housing SPG, the London Borough of Camden's (LBC) local policies as well as the London Plan.
- 3.2 The affordable housing strategy for the Application has been set in accordance with National and Regional Planning Policy guidance and has had regard for the following:
 - National Planning Policy Framework (2021), ('NPPF')
 - The London Plan (2021)
 - Mayor's Affordable Housing and Viability Supplementary Guidance (August 2017), ('SPG')
 - We are also aware of the Draft Mayors Affordable Housing and Development Viability Guidance
 Consultation document (May 2023)
- 3.3 Locally, it has also had regard for the following LBC policies and guidance:
 - Camden Local Plan (July 2017)
 - Camden Planning Guidance Housing (as amended January 2021) (CPGH3)
 - Intermediate Housing Strategy and First Homes (March 2022) (IHSFH)
 - We are also aware of the draft new Camden Local Plan that is currently being consulted on by the Council.

- Camden Intermediate Housing Strategy (Cabinet Report, April 2016) ('IHS')
- Camden Housing Needs Update 2021-39

National Planning Policy Framework

- 3.5 The London Plan promises to change one of the key foundations of planning policy for development in Greater London. A principal concept in the London Plan is "Good Growth," which is defined as "sustainable growth that works for everyone" to improve the health and quality of life for all Londoners, and in particular by rebalancing housing development towards more genuinely affordable homes for Londoners to buy and rent.
- 3.6 The London Plan Policy H5 states that the strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include:
 - requiring residential and mixed-use developments major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach;
 - using grant to increase affordable housing delivery beyond the level that would otherwise be provided.
- 3.7 The London Plan with suggested minor changes sets out the policy in relation to the required tenure split under Policy H7. This includes the following:
 - Minimum of 30 per cent low cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes;
 - a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared Ownership;
 - The remaining 40 per cent to be determined by the borough as low cost rented homes or intermediate products based on identified need.



- 3.8 The policy also emphasises the Mayor's priority to deliver "genuinely affordable housing" including all of the affordable housing products listed in the above section.
- 3.9 The policy also sets out the annual household income requirements and affordability levels.
- 3.10 For dwellings to be considered affordable, annual housing costs, including mortgage (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of new household income.
- 3.11 The London Plan is aligned to the GLA's SPG for Affordable Housing and Viability which is discussed in the following section.

Mayor's Affordable Housing and Viability Supplementary Guidance (August 2017)

- 3.12 The Mayor's Housing SPG (March 2016) has been updated to reflect the London Plan consolidated with alterations (2016). It provides updated guidance on a range of strategic policies including housing supply, residential density, housing standards; build to rent developments, student accommodation and viability appraisals. This SPG replaces the Mayor's Housing SPG 2012 and the Mayor's Housing Standards Policy Transition Statement.
- 3.13 In August 2017, the Mayor published the final SPG. We have therefore had regard to the SPG in this statement.
- 3.14 The key theme from the SPG is the GLA's flexibility with regards to tenure mix on new developments. Point 2.40 of the document refers to the following flexibility allowed in regard to tenure mix is applied to the scheme.
 - 30% low-cost rent (social rent or affordable rent) with rent set at levels that the LPA considers genuinely affordable;
 - 30% as Intermediate products, with London Living Rent and/ or shared ownership being the default tenures assumed in this category;
 - The remaining 40% to be determined by the relevant LPA.

- 3.15 Further guidance on the above tenures as rental levels is discussed in Section 6 of this statement.
- 3.16 As part of the pre-planning application discussions, the Applicant undertook an informal consultation exercise with Registered Providers (RPs) operating in the borough. In general, the RPs were supportive of the social rented delivery and the unit mix proposals, having regard for the town centre location and the implications of managing these units within a mixed tenure scheme.
- 3.17 The GLA issued a draft for consultation for the Affordable Housing and Development Viability London Plan Guidance (LPG) in May 2023 ending July 2023. The aim of this new Guidance document is to build upon the policy of the London Plan and provide a further step towards ensuring that developments assessed through the planning system maximises affordable housing delivery, setting out how viability assessments should be carried out where a planning application follows the Viability Tested Route.

Local Planning Policy

Local Plan (July 2017)

- 3.18 At the local level, the Camden Local Plan (July 2017) sets out the strategic policies for the borough. It replaces the former Core Strategy and Development Policies Document as the basis for planning decisions and future development in the borough.
- 3.19 Policy H1 (Maximising Housing Supply), of Camden's Local Plan (July 2017), sets out the Council's overall borough-wide strategic target to meet or exceed a total of 16,800 additional homes from 2016/17-2030/31, including 11,130 additional self-contained homes. Within this, the policy indicates that where sites are underused or vacant, the council will expect the maximum reasonable provision of housing that is compatible with other uses on the site.
- 3.20 Policy H2 (Maximising the supply of self-contained housing from mixed-use schemes), supports the policy aims of Policy H1. Where housing is required as part of a mix of uses, if 1,000 sqm (GIA) of additional floor space or more is proposed, self-contained housing is required to be provided on site.
- 3.21 Within this policy, in the Central London Area and the town centres of Camden Town, Finchley Road/ Swiss Cottage and Kilburn High Road, where development involves additional floor space of more than 200 sqm (GIA), the council will require 50% of all additional floor space to be self-contained housing, subject to site specific conditions.

3.22 Policy H3 (Protecting Existing Homes), focuses on protecting all housing floorspace where people live long term. It also seeks to protect individual self-contained houses and flats (Use Class C3) and individual houses and flats shared by 3-6 occupiers who share facilities (houses in multiple occupation

or HMOs, Use Class C4).

- 3.23 Policy H4 (Maximising the supply of affordable housing), sets out the council's objective to achieve a contribution to affordable housing from all developments that provide one or more additional home and include a total addition to residential floor space of 100 sqm GIA or more. In these instances, the Council will seek to negotiate the maximum reasonable amount of affordable housing on the following basis:
 - Guideline mix of affordable housing types is 60% social-affordable rented housing and 40% Intermediate;
 - Targets are based on an assessment of development capacity whereby 100 sqm (GIA) of housing floorspace is generally considered to create capacity for one home;
 - Targets are applied to additional floorspace proposed, not existing or replacement;
 - Sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional home;
 - An affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings;
 - For developments with capacity for 25 or more additional homes, the Council may seek affordable housing for older people or vulnerable people as part or all of the affordable housing contribution;
 - Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;
 - For developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site
 - Where affordable housing cannot practically be provided on site, or off-site provision would create a better contribution (in terms of quantity or quality), the Council may accept provision of affordable housing off site in the same area, or exceptionally a payment in lieu.

All the above requirements are subject to assessment on a site-by-site basis.

Floorspace range 1 or more additional homes with an additional residential floorspace of	Capacity (rounded floorspace addition ÷ 100 sq m)	Affordable housing percentage target (capacity x 2%)
100 sq m GIA and above, but less than 150 sq m GIA	1 additional home	2%
150 sq m GIA and above, but less than 250 sq m GIA	2 additional homes	4%
450 sq m GIA and above but less than 550 sq m GIA	5 additional homes	10%
950 sq m GIA and above but less than 1,050 sq m GIA	10 additional homes	20%
1,450 sq m GIA and above but less than 1,550 sq m GIA	15 additional homes	30%
1,950 sq m GIA and above but less than 2,050 sq m GIA	20 additional homes	40%
2,450 sq m GIA and above	25 additional homes or more	50%

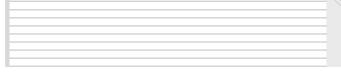
Table 3: Sliding Scale for Affordable Housing Percentage Targets

Source: CPGH3.

- 3.24 Policy H7 (*Large and Small Homes*), seeks to secure a range of homes of different sizes that will contribute to the creation of mixed, inclusive and sustainable communities and reduce mismatches between housing needs and existing supply.
- 3.25 The Council's overall preference is set out in the Dwelling Size Priorities table at point 3.189. The table is based on the outputs of the Camden Strategic Housing Market Assessment. An extract from this table, focusing specifically on affordable housing is set out below.

Tenure	1 Bed (or Studio)	2 Bedroom	3 Bedroom	4 Bedroom (or more)
Social-Affordable	lower	high	high	medium
Intermediate	high	medium	lower	lower
Market	medium	high	high	lower

Source: LB Camden Local Plan (2017)



3.26 The above table indicates that the greatest requirement in the market sector is likely to be for twoor three-bedroom homes, followed by one-bedroom homes/studios. Similarly in the socialaffordable (social) sector is also two- and three-bedroom homes followed by larger four bedrooms or more. The intermediate need is focused on 1 bedroom and 2-bedroom homes.

Camden Planning Guidance Housing (January 2021)

- 3.27 The Camden Planning Guidance Housing (CPGH3) was published in January 2021. It provides a Supplementary Planning Document (SPD) that is in line with the Local Plan. This updated version replaces CPG2 Housing (as amended March 2019) and Interim Housing CPG March 2019.
- 3.28 It is an additional 'material consideration' in planning considerations but it should be noted that the Local Plan carries more statutory weight than the CPGH3. Where there are conflicting policies, the Local Plan will prevail.

Summary

- 3.29 A review of national, regional and local policies demonstrates that LBC is generally aligned with national and GLA policies.
- 3.30 The affordable housing policy agenda has undergone important change at the London level, with the emergence of GLA policy through the SPG. The SPG supports flexibility within affordable housing offers and encourages LPAs to adopt this strategy.
- 3.31 The London Plan (2021) reflects this approach also.
- 3.32 Under the local policies LBC seeks the maximum provision of affordable housing on all mixed-use developments with a capacity for more than 10 dwellings or 1,000 sqm (gross) of additional floor space.

4 **REGISTERED PROVIDER ENGAGEMENT AND CONSULTATION**

Introduction

4.1 This section provides a summary of the Registered Provider (RP) engagement and consultation that the Applicant has undertaken during the pre-planning application process which has informed the evolving design.

Pre-Planning Engagement

4.2 Section 3 of the Housing CPG (2021) sets out the requirement for an Applicant to engage with RPs from the Councils Approved Strategic Partner List (2019) from:

"the earliest stages of housing design, to ensure that the affordable homes will meet the requirements of the Council, housing providers and future occupiers".

- 4.3 The Applicant has engaged with RPs from the start of the pre-planning application process, undertaking separate consultation exercises at different points of the design including November 2022, April 2023 and September 2023.
- 4.4 In the first instance, the Applicant consulted with all of the RPs on the Approved Strategic Partner list which comprises a mixture of larger, G15¹ RPs, medium sized, as well as smaller sized and locally RPs, interested in Section 106 opportunities only.
- 4.5 The key areas that were consulted on included the following:
 - Location of the opportunity and land uses/ proposed uses
 - Size of the opportunity and quantum of affordable housing
 - Tenure and unit mixes
 - Rent levels and affordability
 - Layout and design of units and communal areas

¹ G15 | What we do



- 4.6 At each stage of the consultation, the Applicant used the feedback from RPs to help inform the evolving design and shape the proposals. The key feedback has been summarised as follows:
 - Location and proposals for a separate affordable housing block is supported;
 - Tenure and unit mix composition is acceptable in terms of future management;
 - Proposed rent levels (Social and Intermediate Rent) are supported and in line with requirements in Camden.
- 4.7 The Applicant has also responded to queries that the RPs raised to ensure they have been kept engaged in the process as the scheme moved towards the planning submission.
- 4.8 Key areas of clarity included arrangements for tenure separation, communal amenity space and the results of any noise impact studies for the scheme. All of these issues have been dealt with as part of the planning submission.

Planning Engagement

- 4.9 The Applicant is committed to continual engaging with the RPs operating in Camden through the planning process. This is important not only from a design perspective but also to ensure ongoing awareness and interest in the scheme moving forward.
- 4.10 At present the RP market is extremely challenging for Section 106 opportunities although the consultation so far has indicated a good level of interest from the market including some G15s RPs with a particular focus to develop in Camden and more medium sized RPs. Keeping these organisations involved in the process moving forward will be essential to securing a partner in the long-term delivery.

Summary

- 4.11 The current design proposal and affordable housing offer is reflective on an ongoing engagement process with approved RPs operating in Camden.
- 4.12 The Applicant intends to continue this engagement through the planning and Section 106 negotiation process.

5 FINANCIAL VIABILITY AND OVERALL AFFORDABLE HOUSING PROPOSAL

Introduction

- 5.1 In this section of the Report the proposed affordable housing offer is set out.
- 5.2 The proposed overall provision of affordable housing equates to circa 23% of the scheme. It is understood that the Camden Council and the GLA have accepted a blended approach to bring forward both C3 affordable homes and Affordable Student bedspaces (ASA) in order to meet the threshold approach in the London Plan. The intention is to supplement the residential provision with 42 cluster beds which would bring the overall affordable offer to 35% (in floorspace and habitable rooms).
- 5.3 The proposed tenure split would equate to 59.2% Social Affordable Housing and 40.8% Intermediate and unit numbers.
- 5.4 When considered on a habitable room basis, this equates to 37.2% Intermediate and 62.8% Social Affordable which represents an over provision in comparison to policy.

Tenure	No. of Units
Social Rent	13
Intermediate Rent	11
Total	24

Table 4: Summary of Affordable Housing Offer

Source: The Applicant

Summary

5.5 The scheme meets its affordable housing obligations by bringing forward a blend of C3 affordable homes and affordable student bedspaces (ASA) to reach the London Plan Fast Track threshold of 35%.

6 DETAILED AFFORDABLE HOUSING PROPOSAL- TENURE AND MIX OF UNITS

Introduction

6.1 This section provides further detail on affordable housing requirements in the LBC. The Applicant's affordable housing proposal is then discussed in relation to this.

Affordable Housing Definition

6.2 The NPPF (2021) defines affordable housing as follows:

"Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)". (NPPF, 2018).

Affordable Housing Tenure and Types

- 6.3 There are a wide range of affordable housing products that can be delivered to accommodate households with different needs and income levels. All affordable housing products fall into two broad categories; social housing and intermediate housing.
- 6.4 Social Rent and Intermediate Rent are the housing products proposed for this Scheme, in line with LBC's policy requirements.

Social Rent

- 6.5 Social Rents are calculated using the formula and data set out in the Ministry of Housing, Communities and Local Government's Policy Statement on Rents for Social Housing from 1 April 2020 and in the Regulator of Social Housing's Regulatory Framework for Social Housing (including the Rent Standard 2020) for local authorities and private Registered Providers. The landlord of these homes must be registered with the Regulator of Social Housing.
- 6.6 Overall, a total of 13 Social Rented units will be provided, representing 59.2% of the total affordable housing offer on a unit basis.
- 6.7 A breakdown of the proposed Social Rented units is set out in Table Five.

Table 5: Social Unit Breakdown

Unit Type	Total Number of Units	Total Number of Habitable Rooms	NIA (sq ft)	Unit Type Percentage Breakdown %
1B / 2P	2	4	1,141	15
2B / 4P	5	15	3,767	39
3B / 5P	6	30	6,071	46
Total	13	49	10,979	100%

Source: Applicant

- 6.8 When designing the Scheme, full consideration was given to Policy H2 'New and conventional housing' part D which states that all development proposals for conventional residential dwellings must provide a good mix of unit sizes and the Housing size mix priorities for each tenure.
- 6.9 The proposed housing mix has also been designed to align with the identified need and the Town Centre location of this Scheme.

Intermediate Housing

6.10 Intermediate Housing includes:

"Intermediate housing includes 'low-cost home ownership' products and 'discount market rent' products" (pp.24).

- *6.11* Overall, a total of 11 Intermediate Rented units will be provided. This equates to 46% of the total affordable housing offer on a unit basis.
- 6.12 A breakdown of the proposed Intermediate Rented units is set out in Table Six.

Table 6: Intermediate Unit Breakdown

Unit Type	Total Number of Units	Total Number of Habitable Rooms	NIA (sq ft)	Unit Type Percentage Breakdown %
1B/2P	4	8	2,282	36
2B / 4P	7	21	5,274	64
Total	11	29	7,556	100%
	1	Courses Applicant		

Source: Applicant

Location of Units

6.13 The affordable housing is proposed to be located in a standalone block and which will comprise of 9 floors.

Communal Amenity Space

6.14 Associated amenity space will be provided as part of the proposed development for the Site.

Mix of Units

- 6.15 As this Scheme will provide both Social Affordable and Intermediate Rented accommodation, it is useful to analyse the proposed mix in relation to the unit mix requirements set by the Council.
- 6.16 It should be noted that the Applicant undertook extensive engagement with the Council's Housing Team during the pre-planning application process and consulted on the proposed unit mix offered.
- 6.17 As set out above, the Council seeks the provision of a mix housing sizes, both large and small units, as set out in Policy H7.
- 6.18 The Housing CPG (2021) is more descriptive and confirms the overall unit mix objectives for both tenures.
- 6.19 The following table sets out both the CPG unit mix requirements along with a comparison on what the Scheme is proposing to deliver, in respect of the Social accommodation.

|--|--|--|

Unit Type	No. Units	% Of Units	CPG - Housing (July 2020)
1B / 2P	2	15	No more than 15%
2B / 4P	5	38	35%
3B / 5P	6	46	30% or 50% if no 4 bed-room homes provided
Totals	13	100	100%

Table 7: Social Unit Mix Requirements and Scheme Proposals

Source: Applicant and CPH Hou	ising (2021)
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- 6.20 The above table demonstrates that the Scheme is over providing in terms of larger family units, with 46% of the Social Affordable units being delivered as 3-bedroom units, in line with the Council's requirements.
- 6.21 The IHCPG is less prescriptive on the Intermediate unit mix and sets out the following broad requirements:
 - Studios/ 1 Beds: A substantial proportion is expected in all Schemes.
 - 2 Bed: A limited proportion of high quality two-bedroom, four person homes may be included where they are genuinely suitable for sharers and dedicated to lettings on a shared basis to two eligible households;
 - 3 Bed or more: Will not support provision.
- 6.22 A proportion of high quality 2 bed units has also been included equating to 64% of the offer. They comprise of 2 bed/ 4 person units.
- 6.23 The Scheme proposes an excellent mix of units, in line with the planning policy requirements to meet a variety of housing needs, across both the Social Affordable and Intermediate tenures.

Design of the Units

6.24 The affordable housing units have been designed in accordance with the London Plan and the GLA's Supplementary Planning Guidance.

6.25 The following table sets out the average sizes, per unit type against the minimum space standards.

Size in Scheme	Standard
53	50
70	70
94	86
	70

Table 8: Average Sizes m2 - Unit Type

Source: London Plan (2021) and Applicant

6.26 The proposed units are in line with the minimum space standards for new dwellings, with 3 bed units exceeding the recommended size.

Wheelchair Accessible Units

6.27 As required by Camden Policy H6, 26 accessible units will be provided as part of the student accommodation which would be suitable for occupation by a wheelchair user or easily accessible for occupation by a wheelchair user in accordance with Building Regulation M4(3)(2)b. Units that will be adaptable will also be included in accordance with Building Regulation M4(3)(2a) further down the design process.

Summary

- 6.28 In general terms, the design it is intended to deliver a range of unit sizes across the development. The design mediates between the Local Plan and need to deliver a high proportion of affordable housing and maximum number of units overall, as well as the wish to maximise the number of units delivered in an acceptable planning volume.
- 6.29 The Scheme delivers a range of different sized accommodation, including 1 to 3-bedroom units. Unit sizes are in line with Camden Local Plan requirements and have been designed to comply with the relevant accessible housing standards set out within the Camden Local Plan.
- 6.30 The Social Affordable accommodation will meet the needs of a range of households, including larger households of up to five people.
- 6.31 The Intermediate accommodation will meet the needs of a wide range of households, ranging from single person to smaller households and potentially sharers living in the 2 bed (4p) units.

7 DETAILED AFFORDABLE HOUSING PROPOSAL- RENT LEVELS AND AFFORDABILITY

Introduction

7.1 In this section the rent levels and affordability of the proposed tenure split is considered in further detail.

Social Rent

7.2 It is proposed that the Social-Affordable element of the Scheme will be delivered as Social Rent with weekly rental levels set in line with the Government formula and guidance.

Unit Type	Weekly Rent
1 Bed	£173.74
2 Bed	£184.00
3 Bed	£194.22

Table 10: Social Rent Levels (excluding Service Charges)

Source: Government Rent Standard Guidance²

7.3 As service charges are paid in addition to the rental charge, it is anticipated that the level of service charge will be set at a reasonable and affordable level. The internal design and communal amenity space will be designed in a way that ensures durability and low maintenance ensuring service charges are kept to a minimum.

Intermediate Rent

7.4 It is noted that Camden has a comprehensive policy regarding the required rental levels and subsequent affordability and income thresholds that would be required to afford these.

² Limit on annual rent increases 2023-24 - from April 2023 - GOV.UK (www.gov.uk)

7.5 The requirements are set out further in the Camden Planning Guidance – Housing (January 2021) and specify that all providers should adopt an approach to Intermediate Rent with a range of rent levels from 40% to 80% of market rent to secure scheme viability, whilst ensuring that the majority of provision is affordable to households with incomes between £31,950 and £42,600 (2019 - as adjusted by wage inflation). The maximum cost with a gross annual income of £60,000 would be £323 per week.

- 7.6 Overall, the Council seeks a range of rents appropriate to the particular homes in the scheme which has been considered in the proposals being delivered here.
- 7.7 The weekly rental levels, inclusive of service charges, have been calculated in line with GLA requirement that:
 - No more than 3.5 times the household income threshold to buy;
 - No more than 40% of net household income including rent and service charges (with net income assumed to be 70% of gross income).
- 7.8 It is proposed that the 1 bed units will be affordable households earning up to £40,000 per annum.
- 7.9 It is proposed that the 2 bed (4 person) units will be allocated to a mixture of families and sharers. It is assumed that there will be two adults on a total household income level of c.£55k per annum.
- 7.10 Finally, a proportion of the 2 bed (4 person) will be directed towards sharers on a total household income of £60k, assuming that each household will not earn more than £30,000 per annum in total.

Table 11: Proposed Weekly Intermediate Rents and Annual Household Income

Unit Type	Weekly Rent	Estimated Annual Household Income (Approx.)
1 Bed (2P)	£220	£40,000
2 Bed (4P)	£300	£55,000
2 Bed (4P)	£321	£60,000 (£30k per room)

Source: CPG and GE



- 7.11 All rents are inclusive of service charges and represent the weekly cost of housing for the household.
- 7.12 The above affordability assumptions are estimated at this stage and are subject to change. They are considered reasonable based on the current GLA and LBC income and affordability requirements.

Summary

7.13 The affordability of the Intermediate Rented units has been set in line with the Camden HIS, the CPG and the wider GLA affordability criteria. The units will be accessible to households earning £40,000 up to per annum for 1 bed, £55,000 for 2 bed (4p) family units and up to £60,000 for two sharers, assuming that the households do not spend more than 40% of their net income on housing costs.

8 CONCLUSION

- 8.1 Affordable housing is an important element in the proposed delivery of the scheme.
- 8.2 The Applicant has engaged with both the Council and RPs operating in Camden. This consultation has helped inform and shape the proposed tenure and unit mix and the overall design of the scheme. The Applicant is committed to continuing this engagement through the planning process to enjoy the long-term delivery of the scheme, in line with planning and market requirements.
- 8.3 A total of 2,765 (GIA) or 24 units of residential housing will be delivered as part of this development.
- 8.4 The affordable housing offer comprises of 24 affordable housing units. A blended approach to bring forward both C3 affordable homes and Affordable Student bedspaces (ASA) has been adopted. This residential provision will be supplemented with 42 cluster beds which would bring the overall affordable offer to 35% for the wider student accommodation led Scheme.
- 8.5 A policy compliant tenure split of 62.8% Social Affordable and 37.2% Intermediate Rented is provided by habitable room.
- 8.6 The Social-Affordable housing will be delivered as Social Rent in line with local and GLA policy guidance.
- 8.7 The Intermediate housing will be provided as Intermediate Rent. The proposed household income requirements for this product are within the Council and GLA requirements and will be accessible to households on income of between £30,000- £40,000 per annum. Accommodation for sharers will also be provided, up to the £60,000 per annum income cap.

