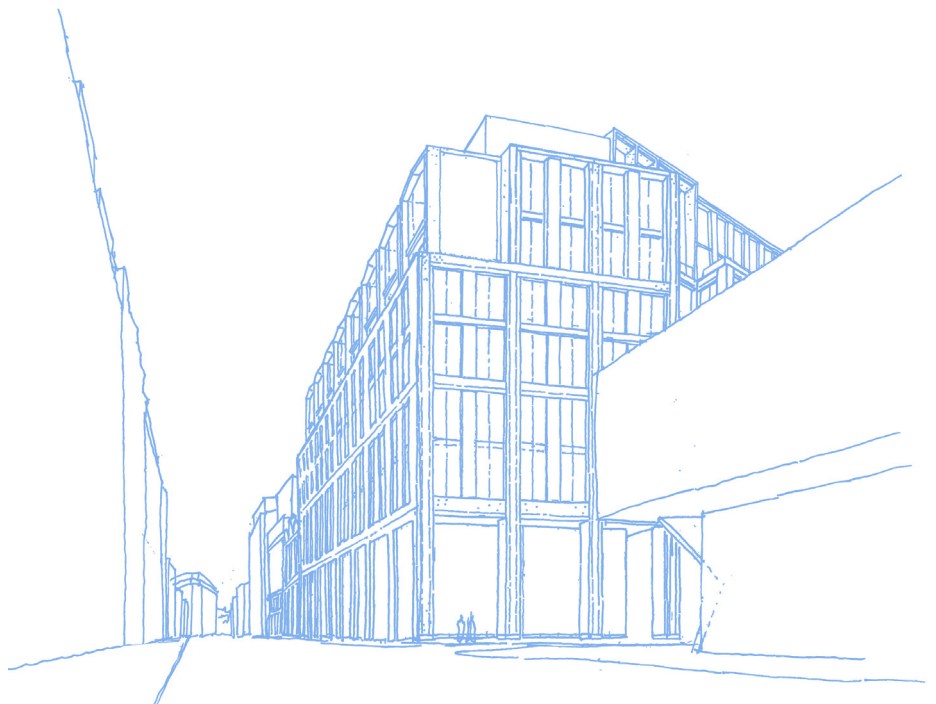


Prepared by Gerald Eve
On behalf of Royal London Mutual Insurance Society

Affordable Housing Statement

Castlewood House & Medius House, WC1A



January 2017



GERALDEVE

Castlewood House, 77-91 New Oxford Street, WC1A 1DT

Affordable Housing Provision: Medius House, 63-69 New Oxford Street, London WC1A 1DG

Affordable Housing Statement

On behalf of: Royal London Mutual Insurance Society

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January 2017

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1 Introduction

- 1.1 Gerald Eve LLP (“GE”) is instructed by Royal London Mutual Insurance Society (“the applicant”) to provide advice in relation to the Proposed Development at Castlewood House, 77-91 New Oxford Street and Medius House, 63-69 New Oxford Street (“the Site”) and a full justification for the affordable housing offer which is proposed to be provided onsite at Medius House.

- 1.2 GE has considered the Affordable Housing provision in line with the Financial Viability Assessment (‘FVA’) which is submitted as part of the planning application.

2 Affordable Housing Planning Policy – National and Regional

2.1 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 (March 2012), ('NPPF')
- The London Plan (2011) and Further Alterations to The London Plan (March, 2016)
- Greater London Authority Housing Supplementary Planning Guidance (March, 2016), ('SPG')
- Draft Affordable Housing and Viability Supplementary Guidance (November 2016), ('Draft SPG')

2.2 Locally, it has also had regard for the following London Borough of Camden policies and guidance:

- Camden Core Strategy (November 2010)
- Camden's Development Policies DPD (November 2010)
- Camden Planning Guidance Housing (May, 2016), (CPG2)

2.3 The following evidence base, Housing Strategy and funding programme documents have also been considered:

- Camden– Intermediate Housing Strategy (Cabinet Report, April 2016) ('IHS')
- GLA – Homes for Londoners – Affordable Homes Programme 2016-21 Funding Guidance (November 2016) ('HFG')

National Planning Policy Framework

2.4 In respect of affordable housing, paragraph 50 of the NPPF aims to boost significantly the supply of housing and states that where local planning authorities have identified that affordable housing is needed, they should set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified. Such policies should be

sufficiently flexible to take account of changing market conditions over time.

2.5 The NPPF also recognises that development should not be subject to such a scale of obligation and policy burdens that its viability is threatened. This reinforces the need for viability testing in order to allow willing landowners and developers to receive competitive returns which in turn enable the delivery of development.

2.6 The context of achieving sustainable development the NPPF refers to ensuring viability and deliverability at sections 173-177. Section 173 in particular states:

“... To ensure viability, the costs of any requirement likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking into account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable”.

The London Plan (March 2016)

2.7 The London Plan is the overall strategic plan for London, and sets out an economic, environmental, transport and social framework for the development of the capital to 2031. It forms part of the development plan for Greater London.

2.8 On 10 March 2015, the Mayor adopted the Further Alterations to the London Plan (“FALP”). From this date, the FALP are operative as formal alterations to the London Plan (the Mayor’s spatial development strategy) and form part of the development plan for Greater London.

2.9 The London Plan has been consolidated to incorporate the Further Alterations and the Revised Early Minor Alterations to the London Plan (REMA), which were published in October 2013.

2.10 On the 14 March 2016, the Mayor adopted the Minor Alterations to the London Plan (“MALP”). From this date, the MALP are operative as formal alterations to the London Plan.

2.11 The London Plan builds upon many of the policies set out at the national level with a

significant emphasis upon achieving development in the most suitable and sustainable of locations, prioritising the use of previously developed land and making the most efficient use of available land.

- 2.12 The London Plan establishes the need for regional growth in housing and employment. It seeks that development should maximise the potential of sites, create or enhance the public realm, provide or enhance a mix of uses, respect local context, character and communities and be sustainable.
- 2.13 Policy 2.13 identifies the need to “encourage rather than restrain” development and “promote mixed and balanced communities” having regard to the need, size and type of affordable housing required, as well as the specific circumstances of the site.
- 2.14 Similarly, Policy 3.8 states, that whilst boroughs should seek the maximum reasonable amount of affordable housing, regard should be had to the need to encourage rather than restrain residential development. Negotiations on sites should take account of their individual circumstances, including development viability.
- 2.15 This is also emphasised in the GLA Housing Supplementary Planning Guidance (SPG) 2016 which emphasises the importance of viability appraisals to deliver affordable housing.
- 2.16 Policy 3.10 goes on to state that affordable housing including social rented and intermediate housing, should be provided to meet the needs of specific households whose needs are not met by the market.
- 2.17 Policy 3.11 sets out the affordable housing targets for London. The London Plan now seeks a preferred tenure split of 60% social rented and 40% intermediate housing and priority should be given to provision of affordable family housing.
- 2.18 Policy 3.12 states that the maximum reasonable amount of affordable housing should be sought when negotiating on residential schemes. In particular the policy sets out that regard should be had to the current and future requirements for affordable housing at local and regional levels. Going on to state that there is a need to encourage rather than retain residential development and promote mixed and

balanced communities.

- 2.19 The London Plan annual housing monitoring target for Camden is 889 new homes. (Equating to 8,892 units between 2015 and 2025).
- 2.20 London Plan Policy 3.8 encourages a full range of housing choice. This is supported by the Housing SPG which identifies the need to secure family accommodation (3.6.1).

Draft Affordable Housing and Viability Supplementary Housing Planning Guidance (November 2016)

- 2.21 Released in November 2016, this draft SPG is currently out for consultation. Regard has been given to this document when considering the affordable housing offer. In particular we have considered the rental levels (London Living Rent) for Intermediate Housing (Section 6.12).

3 Affordable Housing Planning Policy- Local Planning Policy

- 3.1 At the local level, the Camden Council Core Strategy (November 2010) sets out the strategic policies. Affordable housing provision is specifically covered within Policy CS6 – *Providing Quality Homes*.
- 3.2 The Core Strategy (November 2010) sets out the Council's overall policy CS6 for Camden including the borough-wide strategic target to meet or exceed a total of 8,925 additional homes from 2010-2025. Within this, the policy seeks to ensure that 50% of the borough-wide target is provided as affordable housing.
- 3.3 CS6 also includes a requirement to provide a tenure mix of 60% Social Rented and 40% Intermediate Affordable Housing, in terms of net floorspace (2.42). It should be noted that in subsequent documents, notably the CPG2, the Council's reference to tenure has been amended and as per paragraph 2.45, should now *be treated as Social- Affordable Rented Housing and Intermediate Housing*.
- 3.4 The Development policies are set out within Development Policy document, which was also implemented in November 2010. The relevant policies include DP3 – Contributions to the supply of affordable housing, DP4 – Minimising the loss of affordable homes and DP5 – Homes of different sizes. DP3 and DP5 are the most relevant policies relating to new provision.
- 3.5 Policy DP3 supports the delivery of CS6 by setting out the detailed approach to providing affordable housing. The Council expects all residential developments with a capacity for 10 or more additional dwellings to make a contribution to the supply of affordable housing. The Council will negotiate the development of individual sites and related sites to seek the maximum reasonable amount of affordable housing on the basis of a target of 50% of the total additional housing floor space, but will apply the target with regard to a sliding scale from 10% for developments with capacity for 10 dwellings to 50% for developments with capacity for 50 dwellings.
- 3.6 Policy DP3 is aligned with CS6 and specifies the 60% Social-Affordable Rented and 40% Intermediate tenure split. However, the policy recognises that in some circumstances this may not be achievable. For example, due to affordability

and/or viability constraints.

- 3.7 In situations where a development is unable to provide more than 30% affordable housing floor space in total, the Council may have a preference to prioritise Social-Affordable rented over Intermediate. (CS6 2.44)
- 3.8 Policy DP5- Homes of Different Sizes is discussed in detail in the following section where the affordable housing offer is reviewed in relation to the policy requirements.
- 3.9 Policy CS6, and also DP6, addresses the needs of those with mobility difficulties and therefore require dwellings suitable for people requiring wheelchair access to be included in development proposals.

4 Quantum and Unit Mix of Affordable Housing

- 4.1 In this section the level of affordable housing is confirmed along with a breakdown of the unit sizes. This is discussed in relation to the FVA for the scheme.
- 4.2 The affordable housing offer has been calculated in line with Policy DP1 which requires that up to 50% of the proposed uplift in gross external floor area in a development should be used for housing (Class C3). With a total additional floorspace of 8,520sqm being provided, this equates to 4,260 sqm (50%).
- 4.3 The proposed development includes 2,147sqm of residential floorspace being provided on-site representing 25.2% of the proposed uplift, equating to twenty units. All of the above is proposed as affordable housing.
- 4.4 The affordable housing offer comprises 12 Social-Affordable Rented Units (60%) and 8 (40%) Intermediate Rented Units.
- 4.5 Various meetings have been held with Housing Officers at Camden Council since July 2016. At the initial meeting with Connie Petrou, Affordable Housing Development Co-ordinator in July 2016, the following points were confirmed:
- Overall, the proposed housing mix was considered acceptable;
 - Wheelchair units: ideally, the 10% provision would be in the Social-Affordable sector but it was understood that this may not be possible due to design constraints with an existing building;
 - Rental levels to be negotiated but preference would be for the Social-Affordable to be set at Social Rents;
 - Intermediate Rent would be the preferred product in this location due to the potential affordability of units. The rents charged should be in line with the Council's policies;
 - The Council suggested that Registered Providers ('RPs') were consulted with on the design, particularly the communal open space on the terrace.
- 4.6 Further discussion took place between GE and the Housing Team, principally Neil Cleary, Affordable Housing Development Co-Ordinator, between August and

December 2016 and he was kept updated on the proposed scheme mix.

Table 1: Summary of Proposed Affordable Housing Units

Residential	Affordable Rent	Intermediate Rent	Total
Studio (1 person)	1	4	5
1 bed (2 person)	4	0	4
2 bed (3 person)	3	3	6
2 bed (4 person)	1	1	2
3 bed (5 person)	3	0	3
TOTAL	12	8	20

Source: RPP Architects

Proposed Unit Mix

4.7 The Council seeks the provision of a mix and range of housing as set out in Policy DP5: Homes of Different Sizes.

4.8 In Policy DP5, the Council seeks to ensure the creation of mixed and inclusive communities by securing a range of self-contained homes of different sizes. The policy requires the following:

- That all developments meet the priorities set out in the Dwelling Size Priorities Table;
- A mix of small and large dwellings specifying large family units in Social-Affordable as the priority.

4.9 CPG2 sets out a more detailed requirement for Social-Affordable Rented unit mixes:

- 1 Bed: No more than 20% of units
- 2 Bed: 30% of units
- 3 Bed: 30%, or 50% if no 4 bedroom homes are provided

- 4 Bed: 20% of units

4.10 Similarly, for Intermediate Rented units, the required mix:

- Studios: Acceptable but will be resisted if all of the units provided comprise of this unit size
- 1 Bed and 2 beds: Proportions required are flexible as long as key affordability and income criteria are met.

4.11 However, it is stated in CPG2 that the exact mix of dwellings will be negotiated with the developers and providers of affordable housing taking into account the character of the development, the site and the area, and other criteria included in DP5.

4.12 As this scheme is set to provide a mixture of Social-Affordable and Intermediate Rented accommodation, it is useful to analyse the proposed mix in relation to the requirements for this tenure set out above.

4.13 Generally, the affordable housing comprises a good mix of units with the provision ranging from Studios to larger family sized 3 Bed units.

4.14 This is in line with the CPG2 which states that “*Where schemes involve both social-affordable rented housing and intermediate housing, it may often be appropriate to have a high proportion of one-bedroom intermediate homes and a high proportion of social-affordable rented homes with three bedrooms or more. Such schemes can potentially meet our dwelling size priorities while limiting the cost of the intermediate housing and limiting overall child density*” (Par 2.59, CPG2).

4.15 The following table provides a breakdown by tenure of the proposed mix in relation to the policy requirements.

Table 2: Summary of Social-Affordable Rented Units

Unit Size	Total Units	Percentage Proposed %	Policy Requirement %
Studio	1	8	Less than 20%
1 Bed	4	33	
2 Bed	4	33	30%
3 Bed	3	25	30%; or 50% if zero 4beds are being provided
Total	12	100	20%

Source: RPP Architects

- 4.16 The provision of approximately 40% Studio and One bed units in the Social-Affordable tenure is considered appropriate for this development given its central location and the restricted level of amenity space that can be provided on site. Also due to the constraints of working within an existing building the provision of smaller units has enabled the full utilisation of the available space and maximised the total number of affordable units provided. This has been discussed at length with the Housing Team at LB Camden.
- 4.17 The provision of 2 bed units at 33% is in line with the policy requirement of 30%. This mix comprises of mainly 2 bed (3 person) units, with one larger 2 bed (4 person) unit.
- 4.18 The provision of key larger family sized units including three 3 bed units is considered positive given the constraints of the existing building discussed. From a longer term RP management perspective this will be considered as an appropriate number and ensure that a balanced community of both families and single people will be residing in this development.

Table 3: Summary of Intermediate Rented Units

Unit Size	Total Units	Percentage Proposed %	Policy Requirement %
Studio	4	50	Flexible mix and dependent on affordability levels
1 Bed	0	0	
2 Bed	4	50	
Total	8	100	

Source: RPP Architects

4.19 In line with the CPG2, this development proposes a proportion of Studio flats. It is considered acceptable due to the central location being more appropriate for smaller households, working within the confines of the existing building footprint and maximising the total number of affordable housing units. In addition studio flats will also ensure the units are more affordable to households that are eligible for Intermediate Rented housing in line with the Council's Intermediate Housing Strategy (Par 6.15).

4.20 The large provision of 2 bed units will enable couples with children requiring an additional single bedroom and potential sharers to occupy these dwellings. This again contributes to the mixed community which will be key for the sustainable long term management of the building.

Wheelchair Accessible Homes

4.21 Policy DP6 contained within LBC's Development Policies considers that all housing developments should meet lifetime homes standards and 10% of new homes developed should either meet wheelchair housing standards or be easily adaptable.

4.22 Lifetime homes aim to involve design features that have been tailored to foster accessible living essentially allowing people to live in their home for as much of their life as possible. These standards will be applied to all developments of self-contained housing, including conversions reconfigurations and changes of use. Full details can be found in the Camden Planning Guidance supplementary planning document.

4.23 It is acknowledged that the design or nature of some existing properties means that

it will not be possible to meet every element of the lifetime homes standard. However each scheme should achieve as many features as possible.

- 4.24 The Council will apply the wheelchair housing percentage across each affordability category in a scheme; generally seeking 10% of market housing, 10% of social housing and 10% of intermediate housing to be designed, built and fitted-out to meet wheelchair housing standards.
- 4.25 For social rented housing and intermediate housing, each type should include 10% of homes. The Council may seek to amend the number and percentage of intermediate or social rented affordable wheelchair homes to meet the needs of identified future occupiers.
- 4.26 Discussions with the council identified a preference for the two wheelchair accessible units to be provided in the Social/ Affordable tenure rather than any as an Intermediate unit. However it was confirmed that this should not be at the expense of a social rented 3-bed general needs unit. This option was explored by the Architects and found to not be possible within the existing spatial constraints of the building to provide both wheelchair accessible units in the social rented tenure.
- 4.27 Therefore, following the advice given by LBC the scheme will provide:

Table 4: Summary of Wheelchair Accessible Units

Tenure	Unit Size	Total Units	Percentage %
Social Rent	2 bed 4 person unit	1	50
Intermediate	2 bed 3 person unit	1	50
Total		2	100

Source: ARUP

- 4.28 To summarise, it is important to consider the proposed unit mix in relation to the type of development and location that it is set to be delivered in. A good mix of affordable housing is proposed which will contribute to the key housing need

identified by the Council.

5 Tenure and Location of the Affordable Housing

5.1 In this section we discuss the tenure and location of the proposed units, providing an explanation and justification for both elements of the affordable housing offer.

Social-Affordable Housing

5.2 The Council's requirement to provide 60% Social-Affordable Rented accommodation has been met in the proposals for this scheme. Approximately 63% of the total floor space has been allocated to Social-Affordable Rent, equating to 60% of the total affordable units (20 units).

5.3 As discussed at point 3.3, Camden Council considers Social and Affordable Rented housing as one type of provision and refers to it as '*Social-Affordable rented housing*'. Both definitions have therefore been considered in the following sections.

5.4 Social Rented housing is defined in the CPG2 as follows:

"Housing managed by local councils and housing associations. The cost of social rented housing is controlled through target rents set by a national rent regime". (Par, 2.14, CPG2).

5.5 Affordable Rented housing is defined in the CPG2 as follows:

"Housing managed by local councils and housing associations and let to households who are eligible for social rented housing. Rents are set on a scheme by scheme basis and are guided by local market rents rather than a national rent regime. The NPPF indicates that rents should not exceed 80% of the local market rent (including service charges where they apply)". (Par, 2.15, 2.16, CPG2).

Intermediate Housing

5.6 A review of the various policy documents and the Council's Intermediate Housing Strategy demonstrates the importance of delivering this type of affordable housing in Camden.

5.7 In total, by floor space 37% of the area has been allocated to Intermediate Housing. By units, this equates to 40% of the total affordable units.

5.8 Intermediate housing is defined in the CPG2 as follows:

“Housing that costs more than social housing but less than the equivalent market housing. Intermediate housing costs (including service charges) must also be cheap enough for eligible income groups to afford... it can include a range of tenures such as:

- *Rented housing*
- *Shared Ownership housing (where occupiers buy a share and rent the remainder)*
- *Shared Equity housing*
- *Homes for sale at less than market price”. (Par 2.18, CPG2)*

5.9 The Camden Intermediate Housing Strategy demonstrates that Intermediate Housing makes up only an estimated 15% of the RP affordable housing stock in the borough, equating to approximately 1,900 homes. When considered in relation to the total housing stock (across all tenures) in the borough, taking into account future secured planning pipeline, this only equates to approximately 6% of the housing stock (2,350 units).

5.10 Following a review of policy guidance and consultation with the Council’s Housing Officers, it was evident that Intermediate Rent would be the preferred affordable product to be delivered in this development. The central location would have made the affordability of Shared Ownership units extremely hard to achieve and therefore not appropriate as Intermediate Housing.

5.11 In addition, when Shared Ownership is provided, RPs generally prefer a separate core for these units. However, the design constraints would also have made it difficult for the two tenures to be accessed through different cores creating implications for service charges and management arrangements.

5.12 The location of the proposed affordable housing is discussed in the following section.

Location of Affordable Housing

- 5.13 The plans demonstrate that the Social Affordable units are located on the first to fourth floors with three units on each. The eight intermediate rented units are located across the 5th to 7th floors.
- 5.14 This layout has been determined by the composition of the units that each floor can facilitate. As the larger family units are predominately located on the lower floors, it was evident that the Social-Affordable units should be located there. In addition, it is sensible for families with children to be located on the lower floors to improve their accessibility.
- 5.15 In management terms it is also often preferable to group units together by tenure. This enables more efficient management by the RP. For example, in cases where different Housing Officers are responsible for specific tenures.

Communal External Amenity Space

- 5.16 An external communal area of 189 sqm has been proposed as part of the development.
- 5.17 When GE consulted with the various RPs operating in the borough, they provided design feedback which has been taken on board by the Architects and incorporated in the final submission.
- 5.18 The RPs confirmed that this space could be successfully managed with sensitive landscaping and restricted access, i.e. to particular times of the day. Examples were provided of similar types of schemes where this arrangement has worked successfully.
- 5.19 To summarise, this development is providing an excellent mix of housing which has been located in the appropriate area of the development. This was confirmed during the design consultation process with the RPs.

5.20 It is clear that the council considers Social-Affordable Rent and Intermediate Rent to be an essential part of its affordable housing provision in the borough. This combined with achieving the maximum design efficiency and effective long term management for the site, suggests that the proposed tenure and location, is the most appropriate for the Site.

6 Rental Levels and Affordability

6.1 In this section the Council's Social- Affordable and Intermediate Rented Affordability policy is considered and confirmation of the proposed rental levels for this scheme is provided. These are also reviewed in relation to the Mayor's emerging 'London Living Rent' policy.

Social Affordable Rents

6.2 It has been agreed with the Council's Housing Officers that the Social-Affordable rented units will be set in line with the formula rent cap figures for social rent 2017/18 (HFLP, 2016). The social rents are set out in the following table:

Table 4: Social-Affordable Rent Levels (2017-18) and Estimated Total Weekly Housing Costs

Unit Size	2017-18 Benchmark	Total Estimated Weekly Housing Costs (including Service Charges)*
Bedsit and One Bed	£144.42	£160-£165
Two bed	£152.73	£180-£185
Three Bed	£161.22	£190-£200

* Service Charge based on an average of £2.00 per sq ft. This is an estimate based on current market levels and feedback from RPs but may be subject to change.

Source: HFG (2016) and GE

6.3 As social rents do not include service charges, these will be in charged in addition to the rent. The level of service charge will be set at a reasonable and affordable level in line with the guidance set out in CPG2. The internal design and communal amenity space be designed in a way that ensures durability and low maintenance, ensuring service charges are kept to a minimum.

Intermediate Rents

6.4 It is noted that Camden has an extensive policy regarding the required rental levels and subsequent affordability and income thresholds that would be required to afford this. This is summarised as follows:

The CPG2 specifies that the Council will seek to achieve a proportion of the following:

- Intermediate rented homes that households can afford with an income of £30,000 or less per year (gross), (Par 2.50);

6.5 The requirements are set out further in the HIS (2016) 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 a majority of provision is affordable to households with incomes between £30,000 and £40,000 (as adjusted by wage inflation) (Par 6.15).

6.6 When the intermediate rents were calculated in line with the above affordability and income criteria, it was evident that there was a minimal difference between the Social Rent and Intermediate Rents (both inclusive of service charges) total weekly housing costs. This is demonstrated in the following table.

Table 5: Estimated and Proposed Intermediate Rents

Unit Size	Estimated Weekly Social Rents (including service charges)	LB Intermediate Housing Policy Requirement Income Level	Estimated Weekly Rental Level (Based on Policy Requirement)	Proposed Income Levels	Proposed Estimated Weekly Rental Level	Local Housing Allowance (LHA)	Percentage of LHA (%)
Studio	£160-£165	£30,000	£155-£165	£35,000	£185-£195	£ 260.64	69
1 Bed	£180-£185	£30,000	£190-£200	£40,000	£215-£225	£ 260.64	81
2 Bed	£190-£195	£40,000	£215-£225	£45,000	£240-£250	£ 302.33	76

Source: Camden CPG2, Intermediate Housing Strategy and GE

6.7 In order to differentiate the affordability levels between the two tenures, it is proposed that the maximum household income levels for the Intermediate units in this scheme

are adjusted, as set out in the above table.

6.8 The weekly rental levels, inclusive of service charges, were 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)
- Service Charges are based on an average £2.00 psf.

6.9 These income levels remain broadly in line with Camden's intermediate housing policy that requires the '*majority of provision*' is affordable to households with income between £30,000 and £40,000, as per point 6.6.

6.10 The proposed rental levels are lower than the Local Housing Allowance for the Central London Broad Rental Market, at approximately 20-30% below. It should also be noted that the LHA for any area represents the lowest 30% of rental values for an area, demonstrating the significant discount to the market rate the proposed rental levels provide.

London Living Rent

6.11 It is also important to consider the proposed rental levels within the emerging agenda of London Living Rents and the Mayor's proposals to introduce this as a new form of tenure. As the consultation process is currently underway it is difficult to ascertain any detailed information and therefore use this to model future schemes. However, a summary of the key headlines are as follows:

- Initial rents based on median gross household incomes for particular geographic areas, rather than set a single London-wide rate;
- Rents to be set at one third of median incomes for a two bedroom property and possibly 10% lower and higher for one and three bed properties, respectively;
- Approach would likely give a broad range of gross household incomes to be served by LLR from £25,000 to £60,000 (with higher numbers expected around the middle of this range, e.g. between £35,000 and £45,000).

- 6.12 The draft London Living Rent Ward Benchmark Data set by the GLA estimates that based on the above median incomes, the rent for a 2 bedroom property in the Holborn and Covent Garden ward where the scheme is located is approximately £1,249 per month (£288 per week). When this is compared to the proposed rental levels for this scheme of £215-225 per week (equating to approx. £900 per month) it is demonstrated that the GLA London Living rent affordability criteria is clearly being met.
- 6.13 To summarise, the Social- Affordable rental levels will be aligned with the Homes and Communities Agency Social Target Rent benchmarks and the majority of the proposed intermediate rental levels for this scheme are broadly in line with median income levels of between £30,000 - £40,000 per annum, as specified by the Council.
- 6.14 As discussed above in Section 4, these rental levels have been adopted in the Financial Viability Assessment and considered the appropriate rents for the scheme moving forward.

7 Conclusions

- 7.1 Affordable housing is one of the key objectives required to be delivered as part of the Proposed Development.
- 7.2 The Planning Statement has demonstrated that due to the land use and design constraints of this proposed development, the maximum reasonable level of affordable housing is being provided on site.
- 7.3 Given the Council's clear support and need for both Social-Affordable and Intermediate Rented housing and the wider design constraints identified, we are of the view that the proposed tenure and unit mix are the most appropriate for this particular development.
- 7.4 This was supported through the initial RP consultation that concluded the affordable housing provided as part of this development would be acceptable to a number of RP's currently operating in Camden.
- 7.5 Social-Affordable rents set at Social Rent levels are fully in line with the Council's preferences for affordable housing.
- 7.6 It has been demonstrated that the Intermediate Rent levels are broadly in line with the key affordability and income thresholds specified by the Council and are also well within the proposed London Living Rents currently being proposed by the Mayor
- 7.7 The Council's support of Intermediate Rent on this scheme will not only provide truly affordable housing for moderate incomes groups, it will also enable the sustainable longer term management of these units by an RP with specific experience in this area.