



Transformation of the Ugly Brown Building, 2-6 St Pancras Way, NW1 0TB

London Borough of Camden

On behalf of Reef Estates Limited

Affordable Housing Statement

Date: March 2018

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1 Introduction and Instructions

- 1.1 Gerald Eve LLP is instructed by Reef Estates Limited (“the Applicant”) to produce an Affordable Housing Statement (‘AHS’) in support of a planning application for the Transformation of the Ugly Brown Building, St Pancras Way, London Borough of Camden (“the Site”).
- 1.2 A planning application, for the redevelopment of the Ugly Brown Building, was submitted to the London Borough of Camden in September 2017. The application is currently pending (ref: 2017/5497/P).
- 1.3 During the course of determination, a number of further design sessions have been held with London Borough of Camden Planning, Design and Conservation Officers. During these sessions officers have made a number of suggestions as to how the scheme might be refined. Furthermore, comments from a range of third parties have also been received during the determination process.
- 1.4 In order to address the aforementioned comments, revisions have been made to the scheme accordingly. This Affordable Housing Statement provides an assessment of the revised scheme, submitted to the London Borough of Camden in March 2018, and supersedes the original Affordable Housing Statement submitted in September 2017.
- 1.5 The AHS is submitted on behalf of the Applicant, Reef Estates.
- 1.6 The remainder of this report is set out as follows:

2) The Proposed Scheme

3) Local Planning Context: Affordable Housing

4) Financial Viability and Overall Affordable Housing Proposal

5) Detailed Affordable Housing Proposal: Tenure and Mix of Units

6) Detailed Affordable Housing Proposal: Rental Levels and Affordability

7) Concluding Statement

2 The Proposed Development

Introduction

- 2.1 A detailed description of the Site and its surroundings is contained within the Planning Statement. A summary is therefore provided in the section below.

Planning application

- 2.2 The planning application, description of development proposes:

“Demolition of the existing building and erection of 6 new buildings ranging in height from 2 storeys to 12 storeys in height above ground and 2 basement levels comprising a mixed use business floorspace (B1), residential (C3), hotel (C1), gym (D2), flexible retail (A1-A4) and storage space (B8) development with associated landscaping work”.

- 2.3 Full floorplans for the Scheme can be found in the Design and Access Statement which accompanies the planning application
- 2.4 The proposed summary of scheme uses is set out in the following table.

Table 1: Summary of Uses

Use	GIA m2	GEA m2
Office/ Business (B1)	54,522	56,743
Residential (C3)	7,561	8,203
Retail (A1-A4)	5,858	6,426
Gym (D2)	1,601	1,692
Hotel (C1)	4,913	6,283
Storage (B8)	6,011	6,229
Total	80,466	85,576

Source: Bennetts Associates

Residential

2.5 The residential accommodation includes 73 apartments.

Table 2: Residential Summary

Unit Types	No. of Units
Studio	10
1 Bed/ 2 Person	29
2 Bed/ 4 Person	27
3 Bed/ 5 Person	7
Total	73

Source: Bennetts Associates

Affordable Housing

2.6 For the purposes of assessing viability and the proposed affordable housing offer, specific units have been designated as affordable within the Scheme. Further detail is provided in section 4 of this report.

3 Planning Context

Introduction

- 3.1 In this section we provide a brief overview of relevant planning background to the Scheme. A more detailed assessment is contained within the planning statement, which has been submitted to LBC as part of the planning application. This section also provides an overview of key planning policies associated at national, regional and local level including an overview of the planning background relating to the Scheme. Additional reference should be made to the National Planning Policy Framework ('NPPF'), the Planning Practice Guidance ('PPG'), the London Plan, the London Housing SPG, London Borough of Camden's Local policies ("LBC").
- 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 (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')
 - Affordable Housing and Viability Supplementary Guidance (August 2017), ('SPG')
- 3.3 Locally, it has also had regard for the following London Borough of Camden policies and guidance:
- Camden Local Plan (July 2017)
 - Camden Planning Guidance Housing (May, 2016), (CPG2)

3.4 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

- 3.3 The NPPF was published in March 2012 and sets out the Government's economic, environmental and social planning policies for England. It summarises in a single document all previous national planning policy advice. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 3.4 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 onsite, 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.
- 3.5 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.
- 3.6 In the context of achieving sustainable development the NPPF refers to ensuring viability and deliverability and 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”.¹

Planning Practice Guidance (PPG)

- 3.7 The PPG provides guidance to support the NPPF and to make it more accessible. The statements below are from Section 3 of the PPG Viability Guidance found on the Governments online planning portal.
- 3.8 With regards to the Council's consideration of planning obligations in relation to viability

¹ Paras. 173-177 NPPF

– including the assessment of affordable housing provision, PPG states:

“In making decisions, the local planning authority will need to understand the impact of planning obligations on the proposal. Where an applicant is able to demonstrate to the satisfaction of the local planning authority that the planning obligation would cause the development to be unviable, the local planning authority should be flexible in seeking planning obligations.

This is particularly relevant for affordable housing contributions which are often the largest single item sought on housing developments. These contributions should not be sought without regard to individual scheme viability. The financial viability of the individual scheme should be carefully considered in line with the principles in this guidance.’²

Regional Planning Policy

- 3.9 The London Plan, July 2011 with Revised Early Minor Alterations (October 2013) and Further Alterations (March 2015 and March 2016) is the Regional Spatial Strategy for Greater London defined to include the 32 Boroughs and the City of London. The aim of the London Plan is to set out a framework to co-ordinate and integrate economic, environmental, transport and social considerations over the next 20 to 25 years. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the statutory Development Plan.
- 3.10 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.
- 3.11 The growth and management of the city form the major challenge and overarching concern of the London Plan, and are prioritised in order to allow London to excel among global cities within the context of significant rates of development and population increases. The detailed objectives of the Plan seek to ensure that London are set out below:

² Para. 019. Ref ID: 10-019-20140306

- A city that meets the challenges of economic and population growth;
- An internationally competitive and successful city;
- A city of diverse, strong, secure and accessible neighbourhoods;
- A city that delights the senses;
- A city that becomes a world leader in improving the environment; and
- A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

3.12 The London Plan establishes the need for regional growth in housing and employment and identifies Opportunity Areas as a means by which this requirement can be accommodated. The London Plan 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.

3.13 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.

3.14 Policy 3.10 goes on to state that affordable housing including affordable rented and intermediate housing, should be provided to meet the needs of specific households whose needs are not met by the market.

3.15 Policy 3.12 states that the maximum reasonable amount of affordable housing should be sought when negotiating on mixed use 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 restrain residential development and promote mixed and balanced communities. The size and type of affordable housing delivered should reflect the size and type of affordable housing currently in need. Part B of Policy 3.12 states that negotiations on sites should take account of their individual circumstances including the viability of schemes and the availability of public subsidy.

3.16 The Affordable Housing thresholds are set out in Policy 3.13 which states that

Boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes.

- 3.17 Paragraph 3.37 of the London Plan reiterates that the Mayor wishes to encourage, not restrain, overall residential development and that Boroughs should take a reasonable and flexible approach to securing affordable housing on a site by site basis.

Mayors Supplementary Planning Guidance ('SPG')

- 3.18 The current Housing SPG March 2016 has been updated to reflect the Further Alterations to the London Plan ('FALP') and the Minor Alterations to the London Plan ('MALP'). 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 2012 Housing SPG and the Mayor's Housing Standards Policy Transition Statement.

- 3.19 In August 2017 the Mayor published the final SPG. We have therefore had regard to it in this statement.

- 3.20 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 regards 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.*

- 3.1 Further guidance on the above tenures as rental levels is discussed in Section 6 of this statement.

Local Planning Policy

Local Plan (July 2017)

- 3.2 At the local level, the Camden Local Plan (July 2017) sets out the strategic policies for the borough. It replaces the previously former Core Strategy and Development Policies documents as the basis for planning decisions and future development in the borough.
- 3.3 The Local Plan (July 2017) sets out the Council's overall policy H1 – *Maximising Housing Supply*, for Camden including the 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.
- 3.4 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.
- 3.5 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. However, the proposed Site is not located within any of these zones.
- 3.6 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).
- 3.7 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 of the above requirements are subject to assessment on a site by site basis.

- 3.8 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.
- 3.9 The Councils 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.

Table 2: Local Plan – Policy H7, Dwelling Size Priorities

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)

- 3.10 The above table indicates that the greatest requirement in the market sector is likely to be for two or three bedroom homes, followed by one-bedroom homes/studios. The greatest requirement in the affordable sector is likely to be for two and three bedroom homes followed by homes with four bedrooms or more.
- 3.11 The Council has also produced a Planning Guidance for Housing, known as CPG2 – Housing. Full regard has been given to this document in the affordable housing offer and it has been referenced throughout this statement.

Summary

- 3.12 A review of national, regional and local policies demonstrates that the LBC is generally aligned with national and GLA policies.
- 3.13 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.
- 3.14 Under the local policies the LBC policies 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.
- 3.15 Area specific policies are set for different Town Centres across the borough although these policies are not relevant for this specific Site.
- 3.16 LBC seeks developments containing 60% Social-Affordable and 40% Intermediate housing.
- 3.17 The Unit mix specified places an emphasis on larger family sized accommodation for the Social-Affordable units, with a more flexible, site specific approach for the Intermediate units.

4 Financial Viability and overall Affordable Housing Proposal

Introduction

- 4.1 In this section of the report the proposed affordable housing offer is set out.
- 4.2 In accordance with planning policy, the level of affordable housing that can be supported by the proposal is determined by Scheme viability.
- 4.3 GE tested the provision of a policy compliant level of affordable housing on this Site, in line with the aspirations of Policies H1, H2, H4 and H7 regarding the overall percentage and a tenure split of 60% Social- Affordable Rented and 40% Intermediate within this. It was concluded that overall 35% affordable housing based on floor area (both GEA and GIA) could be provided on site.
- 4.4 On this basis, it is proposed that 59% of the affordable floor space, equating to 10 units would be offered as Social-Affordable Rented.
- 4.5 The remaining 41% of the floor space will therefore be offered as Intermediate, equating to 10 units.

Table 3: Summary of Affordable Housing Offer

Tenure	No. of Units	Floorspace Sq m (N1A)
Social-Affordable	10	931
Intermediate	10	653
Total	20	1583

Source: Bennetts Associates

Summary

- 4.6 The affordable housing proposal represents a provision of 35% of all the residential units in the Scheme, with a tenure split of 59% Social-Affordable rented and 41% Intermediate housing. This equates to 20 affordable units on-site.
- 4.7 The outcome of the detailed discussions with the Council will determine the overall planning offer including borough and Mayoral CIL, the affordable housing contribution and other benefits that the Scheme can support whilst ensuring delivery in accordance with the NPPF.

5 Detailed Affordable Housing Proposal: Tenure and Mix of Units

Introduction

- 5.1 This section provides further detail on the Applicant's affordable housing proposal. The proposal is subject to further discussions with Council Officers.

Tenure

Social-Affordable Rented Housing

- 5.2 An affordable housing offer proposing 59% Social-Affordable Rented accommodation has been proposed for this scheme.
- 5.3 The Council considers Social and Affordable Rented housing as one type of provision and refers to it as '*Social-Affordable rented housing*' in Policy H4 (Clause 3.90). Both definitions have therefore been considered below.
- 5.4 Social Rented housing is defined as:

"Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency" (NPPF, p.56)

- 5.5 It is further defined in the Local Plan (2017) as follows:

"Social rented housing is provided at rents guided by national targets and is mostly owned by the Council or Housing Association" (Point 3.86).

- 5.6 Affordable Rented housing is defined as:

"Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable)" (NPPF, p.56).

5.7 It is further defined in the Local Plan (2017) as follows:

“Affordable rented housing is also provided to households who are eligible for social rented housing, mostly by the Council or Housing Associations. Rents are guided by local market rents rather than national targets” (Clause 3.87).

Intermediate Housing

5.8 Intermediate Housing is defined as:

“Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared equity and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing” (NPPF, P.56).

5.9 Intermediate Housing is defined by the NPPF 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”.*

5.10 Intermediate Rent is the housing product proposed in this Scheme in line with Camden’s policy requirements.

Total Affordable Housing Units

5.11 Overall, a total of 73 units are proposed in this mixed use scheme. As discussed, this comprises a tenure split of 59% floor space as Social-Affordable equating to 10 units and 41% Intermediate (Intermediate Rent) equating to 10 units.

5.12 The assumed unit breakdown is set out in Tables 4 and 5.

Table 4: Social- Affordable Unit Breakdown

Unit Type	No. Units	Average Unit Size (sqm)
2 Bed/ 4 Person	2	85.4
2 Bed/ 4 Person WC accessible	1	95.5
3 Bed/ 5 Person	7	96
Totals	10	

Source: Bennetts Associates

Table 5: Intermediate Unit Breakdown

Unit Type	No. Units	Average Unit Size (sqm)
1 Bed/ 2 Person	4	85.4
1 Bed/ 2 Person Wheelchair adaptable	2	88.4
2 Bed/4 Person	4	96
Totals	10	

Source: Bennetts Associates

Location of Units

- 5.13 The affordable housing will be located in a separate core to the private accommodation. The units will have a separate lift and entrance but will share the escape stair with the private units.
- 5.14 The Affordable Rent will be located on Levels 01-05 and the Intermediate on Levels 6-9.

Mix of Units

- 5.15 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 these two tenures set out in Tables 6 and 7.
- 5.16 The Council seeks the provision of a mix housing sizes, both large and small units,

as set out in Policy H7

5.17 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.*

5.18 Similarly, for Intermediate units, the required mix is preferred:

- *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.*

5.19 However, it is stated in CPG2 that the exact mix of dwellings will be negotiated with developer's and providers of affordable housing taking into account the character of the development, the site and the area, and other criteria included in H7.

5.20 In general terms, it is intended to deliver a wide 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 max number of units overall, and the wish to maximise the number of units delivered in an acceptable planning volume.

5.21 The scheme delivers a large proportion of 2 and 3 bedroom units across the scheme. Unit sizes are generally large than the space standards require, and are fully flexible by complying with Lifetime Homes, Habinteg Wheelchair Adaptable or Wheelchair Accessible guidelines.

Mix of Units: Social-Affordable Rent

5.22 The following table sets out how the proposed Scheme meets the affordable housing mix requirements set by the borough.

Table 6: Social-Affordable Rent Mix of Units compared with Policy Guidance

Unit Type	Mix			Councils Preferred Housing Mix
	No/ of Units	% by Floorspace	% by Unit	
1 Bed	0	0	0	20%
2 Bed	3	28%	30%	30%
3 Bed	7	72%	70%	30% or 50% if no 4 beds are provided
4 Bed	0	0%	0%	20%
Totals	10	100%	100%	100%

Source: CPG2 and GE

5.23 Overall, approximately 40% of the affordable floor space and total units will be provided as large family sized units, with the provision of 2 beds well exceeding the 30% target.

Table 7: Intermediate Mix of Units compared with Policy Guidance

Unit Type	Mix			Councils Preferred Housing Mix
	No. of Units	% by Floorspace	% by Unit	
1 Bed	6	52%	60%	Flexible approach
2 Bed	4	48%	40%	
Totals	10	100%	100%	100%

Source: CPG2 and GE

5.24 This mix was arrived at following consultation with officers at LB Camden throughout the planning process. The original proposals included family units within the Intermediate tenure, and a smaller proportion within the Social Affordable offer.

5.25 LB Camden wished to see a larger proportion of family units within the Social-Affordable Tenure, with a subsequent reduction within the Intermediate Tenure. This

has been addressed with the submitted unit mix.

- 5.26 There has been a focus on the provision of family accommodation in the Social-Affordable Rented units, which has been achieved.
- 5.27 All of the two beds will be provided as 2B/4P units, to make Intermediate Rented accommodation suitable for sharers where possible.
- 5.28 Due to the timescales for the delivery of the residential phase, it has not been considered appropriate to select a Registered Provider (RP) partner at this stage. However informal discussions have taken place with RPs from the Approved Strategic Provider list regarding design.
- 5.29 The affordability and suitability of these units in terms of meeting housing need will be discussed in Section 6.

Summary

- 5.30 The affordable housing units will be located in a separate core to the private market housing, but will share an escape stair with the private units.
- 5.31 The tenure split proposed is in line with policy objectives.
- 5.32 The unit mix provided focuses on larger, family sized accommodation in line with the requirements and policy objectives set out by the Council, as reiterated during consultation.

6 Detailed Affordable Housing Offer: Rental Levels and Affordability

Introduction

- 6.1 In this section the Council's Social- Affordable and Intermediate Rented housing is considered. This includes proposals for the weekly rental levels which are reviewed in relation to Local Housing Allowance and the Mayors 'London Living Rent' policy.

Social-Affordable Rents

- 6.2 It is proposed that the rental levels will in set in line with the London Affordable Rent figures, as specified in the GLA's Homes for London Investment Prospectus. The units will be set at rent levels in line with the 2017-18 benchmarks. These reflect the formula rent cap figures for social rents uprated by CPI for September 2016 plus one per cent.
- 6.1 The proposed rent levels are set out in the following table and highlighted where relevant.

Table 8: London Affordable Rent Proposed Rent Levels

Unit Size	London Affordable Weekly Rents Benchmark Levels (£)	Estimated Weekly Service Charges (£)	Total Weekly Housing Costs inc. Service Charges (£)	London Affordable Weekly Rent Plus Service Charges as a % Market Rent (GLA London Rent Map)	London Living Weekly Rent (£)	Local Housing Allowance Weekly (£)
1 Bed	£144	£21	£165	43%	£224	£261
2 Bed	£153	£27	£180	33%	£248	£302
3 Bed	£161	£39	£200	31%	£273	£354

Source: Homes for Londoners Investment Prospectus (2016), GLA London Living Rents, Local Housing Allowance, GLA Rent Map

- 6.3 The rent levels have also been checked against the Local Housing Allowance (LHA) for the Central London Broad Rental Market. The local limits are based on the cheapest 30% of properties in an area. It is evident that the proposed rent levels fall well below the caps for this area.
- 6.4 The proposed rents have also been considered in relation to London Living Rents and the Mayor’s new policy in this area. These rents are based on median gross household incomes for particular geographical areas, rather than a set London-wide rate. The levels used here are based on analysis of Ward Benchmark Data for the Regents Park Ward, where this Scheme is located. Table 9 below demonstrates that the proposed rents are well below these levels and met the GLA affordability criteria.
- 6.5 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.
- 6.6 In order to calculate the estimated total weekly housing costs, an assumption of £2.00 psf service charge has been included in the table in line with market norms. Please note that this could be subject to change once the detailed design and scheme specifications are completed.
- 6.7 Based on the above analysis, Table 9 sets out the annual household income levels that would be required in order to afford the weekly housing costs for these properties.

Table 9: Income Affordability Requirements for London Affordable Rents

Unit Size	London Affordable Weekly Rents (£)	Estimated Weekly Service Charges (£)	Total Weekly Housing Costs inc. Service Charges (£)	Total Annual Housing Costs inc. Service Charges (£)	Annual Household Income Required (£)
1 Bed	£144	£21	£165	£8,578	£30,622
2 Bed	£153	£27	£180	£9,352	£33,386
3 Bed	£161	£39	£201	£10,429	£37,230

Source: GE

Intermediate Rent

6.8 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 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);

6.9 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).

6.10 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).*

6.11 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.

6.12 The proposed rental levels are approximately 60% of the Local Housing Allowance for the Central London Broad Rental Market. 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.

Table 10: Intermediate Rent Affordability and Income Requirements

Unit Size	London Affordable Weekly Rents (£)	Total Annual Housing Costs inc. Service Charges (£)	Annual Household Income Required (£)
1 Bed	£165	£8,613	£30,000
2 Bed	£190	£9,918	£34,713

Source: GE

- 6.13 The above affordability assumptions are estimated at this stage and are subject to change. They are considered reasonable based on the current market and London Borough of Camden income and affordability requirements.
- 6.14 As discussed in Section 5, due to the design constraints of the building, a small number of 3 bed Intermediate units have been proposed in this Scheme. We are of the view that these units will meet an important housing need in the borough for either families or sharers.
- 6.15 For example, in Camden, the median market rent for a 3 bedroom property is £647 per week. Therefore, a family or a group of sharers in need of a 3 bedroom property would require a household income of £120,000 to be able to afford a market rented property.
- 6.16 As shown in the above table, the rents required for these units will be approximately £215 per week, requiring a £40,000 per annum income. If the units were rented by a family, two annual incomes of approximately £20,000 per annum would be needed. Alternatively, three sharers earning average £10-£15k could also access these properties.
- 6.17 A strategy could be discussed with the selected Registered Provider aimed at ensuring these units are targeted towards a particular need group in line with Council objectives.

Summary

- 6.18 The Social-Affordable Rented units will be let at London Affordable Rent in line with the Council and GLA requirements. The annual household income levels required to meet the total housing costs are below the median household income for both the ward and wider borough.
- 6.19 The affordability of the Intermediate units has been set in line with the Camden HIS (2016) and on average will be accessible to households earning £30k - £40k per annum.

7 Conclusion

- 7.1 Affordable housing is a key element in the proposed delivery of the Scheme.
- 7.2 The financial viability assessment for the Scheme demonstrates that a total of 35% affordable housing can be delivered on this Scheme in line with the policy requirement for housing overall.
- 7.3 The Scheme will therefore provide 35% on-site affordable housing at a tenure split of 59:41 (Social-Affordable Rented: Intermediate rented) equating to 20 units on-site.
- 7.4 The unit mix proposed meets policy requirements and exceeds the key priority in terms family sized accommodation.
- 7.5 The proposed London Affordable Rent levels meet both the Council and GLA policies for rented housing and the affordability requirements associated with this.
- 7.6 The Intermediate housing will be provided as Intermediate Rent. The proposed household income requirements for this product are within the Council requirements and will be accessible to households on income of between £30- £40k.