



**Network Building, 95-100 Tottenham Court Road & 76-80, 88  
Whitfield Street and 14-19 Tottenham Mews**

## **AFFORDABLE HOUSING STATEMENT UPDATE**

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**On behalf of Derwent Valley Property Developments Limited & Central  
London Commercial Estates Limited**

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## 1 EXECUTIVE SUMMARY

- 1.1 This Affordable Housing Statement (hereafter “AHS”) has been prepared on behalf of Derwent Valley Property Developments Limited and Central London Commercial Estates Limited (the “Applicant”) in respect of the redevelopment of the Network Building at 95-100 Tottenham Court Road & 76-80, 88 Whitfield Street, and the site at 14-19 Tottenham Mews (collectively “the Development”). The Site is located within the London Borough of Camden (the “Council”).
- 1.2 This AHS demonstrates that the affordable homes proposed as part of the Development accord with the Statutory Development Plan and other material planning considerations.
- 1.3 The content of this AHS is summarised below:

Affordable Housing Statement Summary	
Site	Network Building, 95-100 Tottenham Court Road & 76-80, 88 Whitfield Street, and 14-19 Tottenham Mews.
Proposals	The office-led redevelopment of Network Building with the associated ‘off-site’ redevelopment of Tottenham Mews for affordable housing.
Policy requirements	<p>Policy H2 of the Local Plan requires the provision of 50% of all additional floorspace in respect of non-residential development involving more than 200 sq m (GIA) of additional floorspace to be self-contained housing.</p> <p>The requirement for self-contained housing also triggers the requirement for affordable housing under Policy H4 of the Local Plan.</p>
Types & quantum of housing	<p>No private housing is proposed as part of the Development. The shortfall against the policy requirements for self-contained housing is justified through financial viability.</p> <p>23 Affordable homes are proposed ‘off-site’ at Tottenham Mews. The provision of affordable housing off-site enables a greater overall amount of affordable housing to be delivered. This is afforded significant weight.</p> <p>The minor shortfall in affordable housing against the aggregated policy requirements of both sites is justified through financial viability. This Statement should therefore be read alongside the Financial Viability Assessment which demonstrates that the proposed affordable housing provision is the maximum reasonable.</p>

Affordable tenure	<p>10 x homes for Social Rent and 13 x homes for Intermediate Rent.</p> <p>Due to the higher proportion of family homes within the Social Rent component the overall tenure split is 52% Social Rent and 48% Intermediate when considered on a habitable room basis, or 50% Social Rent and 50% Intermediate when considered on a floorspace (GIA) basis.</p>
Affordability	<p>The Social Rent homes will be let at London Affordable Rent levels as set out by the Mayor London.</p> <p>The Intermediate Rent homes are to be let in accordance with the Council's in Intermediate Housing Strategy which seeks to ensure that homes are affordable to gross household incomes of between £30,000 and £40,000 per annum.</p>
Housing sizes	<p>A range of unit sizes is proposed which have been agreed with the Council's Housing Officers during pre-application discussions. The mix of the Social Rent homes is:</p> <ul style="list-style-type: none"> <li>• 6 x 2 bed 4 person homes</li> <li>• 4 x 3 bed 5 person homes</li> </ul> <p>The mix of the Intermediate homes is:</p> <ul style="list-style-type: none"> <li>• 2 x 1 bed 1 person homes</li> <li>• 3 x 1 bed 2 person homes</li> <li>• 3 x 2 bed 3 person homes</li> <li>• 5 x 2 bed 4 person homes</li> </ul>
Design	<p>All affordable homes will meet or exceed the design standards set out in local policy or the Intend to Publish London Plan. The scheme has also been designed to be accessible and includes 2 x Wheelchair adaptable homes on the ground floor.</p>
Delivery	<p>The Applicant has engaged with the Council's approved Registered Provider partners during the pre-application period to ensure the Providers were fully involved in the design process and that the scheme meets their requirements.</p> <p>It is proposed to dispose of the Tottenham Mews site to a Registered Provider subject to planning permission being secured. The Registered Provider will then construct, own and manage the affordable homes.</p>

## **2 INTRODUCTION**

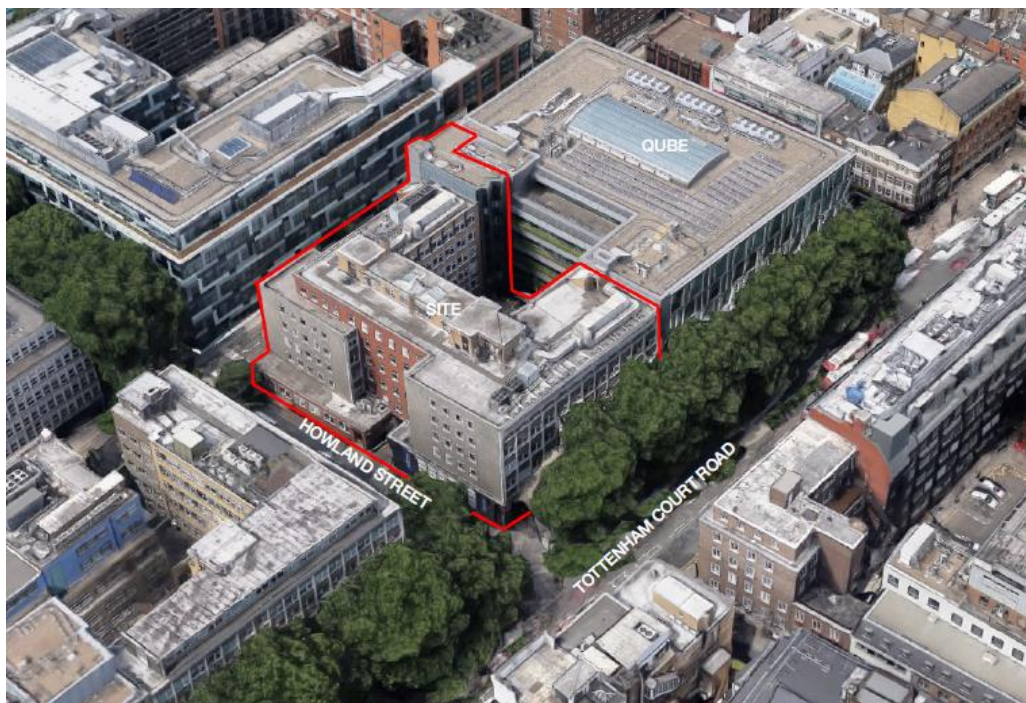
- 2.1 This AHS has been prepared by DS2 LLP on behalf of the Applicant in accordance with local, strategic and national planning policy, in support of the planning application submitted in relation to the Development.
- 2.2 This AHS provides evidence which demonstrates that the amount, type and mix of housing proposed as part of the planning application is appropriate for the site and proposals, and in accordance with the Development Plan and other material planning considerations.
- 2.3 This AHS is structured as follows:
- Overview of the site and the development proposals;
  - A summary of the relevant national, regional and local planning policy considerations;
  - An assessment of the housing proposals against the policy guidance; and
  - Summary of the conclusions
- 2.4 In preparing this AHS, the Applicant has had several pre-application meetings and discussions with Planning and Housing Officers at the Council, as well ongoing dialogue with the Council's approved Registered Provider partners.
- 2.5 The AHS should be considered alongside several other documents, including but not limited to the Planning Statement prepared by DP9, the Design and Access Statement prepared by Piercy & Co architects and the Financial Viability Assessment prepared by DS2.

### **3 THE APPLICATION**

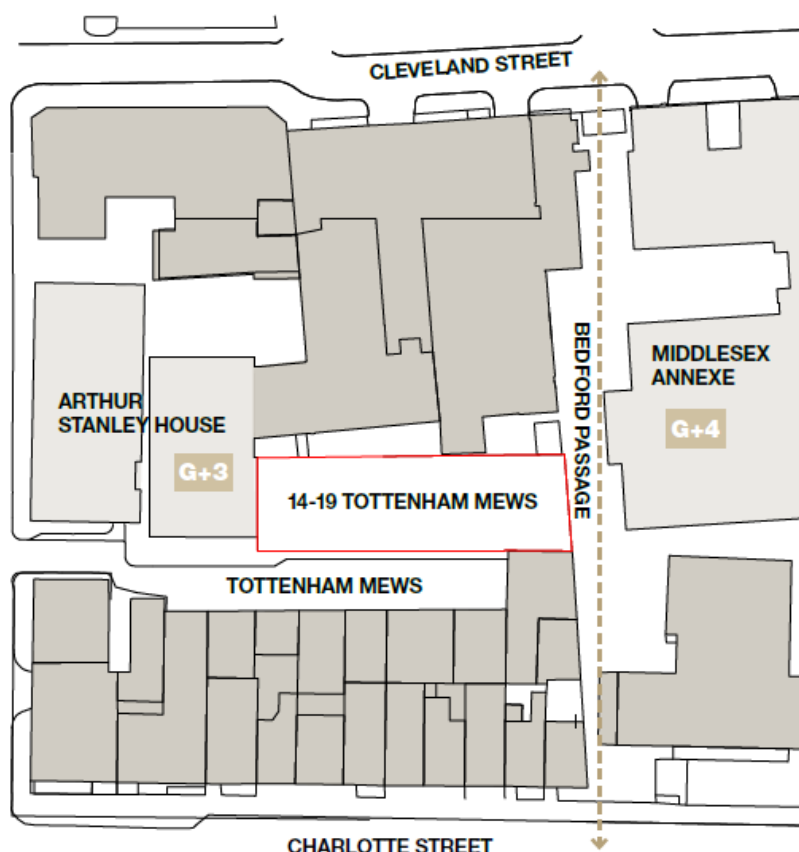
- 3.1 A detailed site description is contained within the Planning Statement and Design & Access Statement submitted with the planning application. A relevant summary is provided below.

#### **Site Location**

- 3.2 The subject properties occupy two separate sites within the Fitzrovia area of Central London. The Network Building application site occupies the southern half of the block bounded by Tottenham Court Road on the east, Whitfield Street to the west and Howland Street to the south. The existing building is a six-storey office building with retail units at ground level.
- 3.3 The boundary of Network Building is defined by the red line in the plan below.



- 3.4 Tottenham Mews is located within circa 400m from the Network Building in a mews location off Tottenham Street.
- 3.5 The boundary of the Tottenham Mews site is defined by the red line in the plan below.



### Site Description

#### **Network Building**

- 3.6 Network Building is a multi-let, mixed use, building, comprising office and retail accommodation. To the rear of the main office and retail building, are seven residential apartments, which are accessed from Whitfield Street. The Network Building site extends to 0.22 ha.
- 3.7 The following table sets out the current floor areas for the Network Building:

Use	Area (sq m)		
	NIA	GIA	GEA
Office	5,168	7085	7,219
Retail	903	1156	1,435
Residential	617	844	929
<b>TOTAL</b>	<b>6,688</b>	<b>9,085</b>	<b>9,583</b>

#### **14-19 Tottenham Mews**

- 3.8 The site comprises a temporary prefabricated building dating from the 1970s, which is located on the western side of Tottenham Mews. The building is currently vacant and is soon to be demolished by the Applicant to allow the site to be utilised to facilitate the construction of the approved scheme at Middlesex Hospital Annex. The Tottenham Mews site extends to 532 sq m.



3.9 The following table sets out the current floor areas for the Tottenham Mews building:

Use	Area (sq m)		
	NIA	GIA	GEA
Former Mental Health day centre	668	706	723
<b>TOTAL</b>	<b>668</b>	<b>706</b>	<b>723</b>

### **Development Proposals**

#### **Network Building**

3.10 The Applicant is seeking outline planning permission to provide a new office led, mixed use building, providing ground floor reception area, office accommodation, A1/A3 retail (flexible uses) and ancillary, back of house (BOH) and plant.

3.11 The application description of development is as follows:

*“Demolition of the existing building and construction of a new building to provide for a maximum of 17,746 sqm (GIA) of E class use floorspace along with details of access, scale and landscaping and other works incidental to the application (layout and appearance reserved).”*

3.12 The following table sets out the maximum areas proposed under the outline application:

Use	Area (sq m)		
	NIA	GIA	GEA
Office (Class E (g))	12,296	17,225	19,388
Retail (Class E (a & b))	458	521	586
<b>TOTAL</b>	<b>12,754</b>	<b>17,746</b>	<b>19,974</b>

#### **14-19 Tottenham Mews**

3.13 The Applicant is seeking detailed planning permission for the residential-led redevelopment of the site. The residential homes are to be arranged over ground and five upper storeys and will be provided as 100% affordable housing. The scheme will also include offices, to be provided as Affordable Workspace at basement and ground floor.

3.14 The application description of development is as follows:

*“Erection of a ground plus five storey building (plus one basement level) to provide office (e class) at part ground and basement level and residential dwellings (C3) at ground and floors one to five and associated landscaping, cycling parking and all necessary enabling works.”*

3.15 An illustrative image of the proposals is shown below:



3.16 The following table sets out the areas proposed under the detailed application:

Use	Area (sq m)		
	NIA	GIA	GEA
Residential (Class C3)	1,685	2,214	2,684
Office (Class E (g))	249	364	444
<b>TOTAL</b>	<b>1,943</b>	<b>2,578</b>	<b>3,128</b>

#### Residential

- 3.17 The design of the proposals as Tottenham Mews has been informed by ongoing discussions with the Council's Housing Officers and the Council's approved Registered Provider partners. The proposals comprise the delivery of 23 affordable homes, including 10 homes for Social Rent and 13 homes for Intermediate Rent.
- 3.18 A range of unit sizes is proposed. The unit mix for each tenure responds to the Council's housing needs priorities and comments from the Registered Providers. The full unit mix is set out below

Unit type	Tenure	
	Social Rent	Intermediate Rent
1 bed 1 person	-	2
1 bed 2 person	-	3
2 bed 3 person	-	3
2 bed 4 person	6	5
3 bed 5 person	4	-
<b>TOTAL</b>	<b>10</b>	<b>13</b>

- 3.19 All units' sizes will comply with the minimum space standards set out in National Guidance and the Mayor of London's Intend to Publish London Plan.
- 3.20 The affordable homes are arranged around a single access and lift core, with a number of homes from level 1 and above accessed via a rear deck. There will be 45 spaces for bicycles located in the basement. Refuse is located at ground floor, accessed from an independent entrance on Tottenham Mews.
- 3.21 The proposals will also include a new link to Bedford Passage, a new east-west pedestrian link from Charlotte Street to Cleveland Street that is being provided as part of the Middlesex Hospital Annex development, providing a route through Tottenham Mews enabling greater connectivity and access for residents.

#### Commercial Accommodation

- 3.22 The proposals include the provision of 364 sq m (GIA) of Affordable Workspace. This comprises both ground floor and basement accommodation with an internal staircase connecting the two levels. Access will be provided on Tottenham Mews or from Bedford Passage.
- 3.23 The Affordable Workspace occupiers will benefit from six bicycle spaces located at ground floor level.

## **4 PLANNING POLICY CONTEXT**

- 4.1 The following section of this Affordable Housing Statement provides a summary review of the key national, regional and local planning policy that guides the delivery of affordable housing, with reference to the importance of considering scheme specific financial viability and balancing the requirements of obtaining planning obligations with the risks of non-delivery.

### **National Policy**

#### **National Planning Policy Framework**

- 4.2 The revised National Planning Policy Framework (NPPF) was published in July 2018 and updated in February 2019.
- 4.3 At the heart of NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both the plan-making and decision-taking process. This means approving development proposals that accord with the development plan without delay and, where there are no relevant development plan policies, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of development.
- 4.4 Paragraph 62 of the NPPF states that, where there is a need identified for affordable housing, the affordable housing should be provided on-site, except in justified circumstances.
- 4.5 The definition of affordable housing included within the Glossary (Annex 2) of the NPPF includes Social Rented, Affordable Rented and Intermediate tenure housing as affordable housing i.e. housing provided to eligible households whose needs are not otherwise met by the market.

### **Regional**

#### **London Plan (March 2021)**

- 4.6 The Draft New London Plan with Consolidated Suggested Changes was published in July 2019. The draft London Plan was considered by a formal Examination in Public ("EIP"), which commenced on the 15th January 2019 and finished on the 22nd May 2019. On the 9th December 2019 the Mayor issued a clean and tracked version of the Intend to Publish London Plan the Secretary of State. The Secretary of State issued their response and directions on the 13 March 2020. The Mayor is now considering the Secretary of States response and is taking the statutory steps to finalise the Plan. At this stage, the draft London Plan is not adopted policy; however, it is at a significantly advanced stage and therefore carries close to full weight.
- 4.7 The Mayor states there is a need to deliver circa 43,500 affordable homes per year, as established in the London Strategic Housing Market Assessment. The Council's annual target is 1,086 homes per annum, an increase of 197 compared to the current London Plan.
- 4.8 Policy H5 of the draft London Plan identifies the Mayor's strategic target for affordable homes, which is for 50% of all new homes delivered across London to be affordable.

- 4.9 Policy H6 of the draft London Plan encourages residential and mixed-use developments to provide affordable housing through the threshold approach is consistent with the GLA Affordable Housing and Viability SPG, dated August 2017.
- 4.10 The threshold proposed is 35% of a scheme as affordable housing based on habitable rooms. Schemes that do not meet (or exceed) the 35% threshold and do not meet the specified tenure mix and all other requirements and obligations, will be required to submit viability information.

**The Mayor's Affordable Housing and Viability SPG (August 2017)**

- 4.11 The GLA published the draft SPG in November 2016 for consultation. Following a period of consultation, the final SPG was adopted in August 2017. The Mayor's guidance is, therefore, a material consideration in the determination of planning applications.
- 4.12 The SPG represents the new Mayoral administration's policy objectives in relation to the delivery of new homes, including affordable housing. The overarching objectives of the SPG are clear in seeking to enhance housing and economic opportunities for all persons across the capital. The SPG provides guidance regarding the practical application, methodologies and approach to site value, amongst others, for viability assessments.

**Local Policy**

- 4.13 The Council's affordable housing policy is contained with Camden's Local Plan (2017). The Local Plan was adopted by the Council in July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough.
- 4.14 Policy H2 of the Local Plan applies to all proposals for new build non-residential development and extensions involving a significant floorspace increase. Policy H2 specifically seeks provision of self-contained houses and flats (Use Class C3). In the Central London Area and the town centres of Camden Town, Finchley Road/Swiss Cottage and Kilburn High Road, where development involves additional floorspace of more than 200 sqm GIA, the Council require 50% of all additional floorspace to be self-contained housing, subject to the following conditions;
- a) *The character of the development, the site and the area;*
  - b) *Site size, and any constraints on developing the site for a mix of uses;*
  - c) *The priority the Local Plan gives to the jewellery sector in the Hatton Garden area;*
  - d) *Whether self-contained housing would be compatible with the character and operational requirements of the proposed non-residential use and other nearby uses; and*
  - e) *Whether the development is publicly funded or serves a public purpose.*
- 4.15 In addition to the criteria listed at a) to e) the Council will also consider whether self-contained housing should be provided on site. In doing so the following criteria will be considered

- f) the need to add to community safety by providing an active street frontage and natural surveillance;*
- g) the extent of any additional floorspace needed for an existing user;*
- h) the impact of a mix of uses on the efficiency and overall quantum of development;*
- i) the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and*
- j) whether an alternative approach could better meet the objectives of this policy and the Local Plan.*

4.16 The Council's affordable housing policy is contained within Policy H4 of the Local Plan. The Council will expect a contribution to affordable housing from all development that provide one or more additional homes and involve a total addition to residential floorspace of 100 sq m GIA or more. The Council will seek to negotiate the maximum reasonable amount of affordable housing on the following basis;

- a) The guideline mix of affordable housing types is 60% social/affordable rented housing and 40% intermediate housing;*
- b) Targets are based on an assessment of development capacity whereby 100 m2 GIA of housing floorspace is generally considered to create capacity for one home;*
- c) Targets are applied to additional housing floorspace proposed, not to existing housing floorspace of replacement floorspace.*
- d) A sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity;*
- e) An affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings;*
- f) 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;*
- g) Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;*
- h) For developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site; and*
- i) Where affordable housing cannot practically be provided on site, or offsite provision would create a better contribution (in terms quantity and/or quality), the Council may*



*accept provision of affordable housing offsite in the same area, or exceptionally a payment-in-lieu.*

4.17 In addition to the criteria listed at a) to e) the Council will also consider whether self-contained housing should be provided on site. In doing so the following criteria will be considered

- j) the character of the development, the site and the area;*
- k) site size and any constraints on developing the site for a mix of housing including market and affordable housing, and the particular types of affordable provision sought;*
- l) access to public transport, workplaces, shops, services and community facilities;*
- m) the impact on creation of mixed, inclusive and sustainable communities;*
- n) the impact of the mix of housing types sought on the efficiency and overall quantum of development;*
- o) the economics and financial viability of the development including any particular costs associated with it, having regard to any distinctive viability characteristics of particular sectors such as build-to-let housing; and*
- p) whether an alternative approach could better meet the objectives of this policy and the Local Plan.*

4.18 Policy H3 seeks to protect all existing housing floorspace, resisting development that would involve a net loss of residential floorspace.

4.19 In addition to the primary policies found within H2 and H4, Policy H6 and H7 consider design quality and mix of homes required as part of development in the borough. These are considered in further detail in Section 5 of this AHS.

4.20 The Council's Interim Housing CPG (March 2019) supports the policies in the Camden Local Plan (2017) and provides further guidance on the application of the housing policies contained within the Local Plan, and which is a material consideration in planning decisions.

## 5 APPROACH TO AFFORDABLE HOUSING

### Assessment against planning policy

- 5.1 This section of the AHS considers the proposed approach to affordable housing and assesses whether the Development is in accordance with the relevant planning policies.

### **Off-site delivery**

- 5.2 The provision of housing and affordable housing must be justified, taking into account the criteria set out in Local Plan policies H2 and H4.
- 5.3 The Applicant has considered a range of different scheme scenarios to test whether the provision of on-site residential was feasible at the Network Building. These scenarios were discussed with Council Planning Officers during the pre-application period and include the retention and/ or extension of the existing residential homes on Whitfield Street as well as the option of including new residential floorspace configured laterally on the upper or lower levels. The testing concluded that it was not practically or economically feasible to include on-site residential provision. A summary of the key reasons is included below:
- Any residential on-site at Network would be single aspect due to the depth of the existing and proposed commercial floorplates;
  - Additional cores and service penetrations resulting in a loss of floorspace, impacting on scheme efficiencies, adversely affecting the viability of development.
  - Retention of existing residential not feasible due to poor floor to ceiling heights and complexities of 'tying' this into the new commercial development of different floor heights;
  - Retention of existing residential not feasible due and outdated fire safety configuration;
  - Noise and pollution impacts on residential occupiers where residential homes face onto Tottenham Court Road and Howland Street; and
  - Impact on long term investment value of providing residential on top of, or in the midst of, commercial, adversely affecting the viability of development.
- 5.4 Considering the economic impacts noted above the delivery of residential floorspace off-site enables greater amount of non-residential floorspace at the Network Building, thereby improving the viability of the Development as a whole, which in turn allows for a greater amount of affordable housing to be viably delivered at Tottenham Mews, than would have otherwise been possible. This principle of 'additionality' as a result of optimising the main application site is noted within the Local Plan supporting text at paragraph 3.55.
- 5.5 In considering the weight to be afforded to the provision of affordable homes, the Council's housing delivery performance provides useful context. The Council's most recent Annual



Monitoring Report (2017/18) notes that the Council's average net affordable housing completions over the past 6 years is 190 homes per annum. The use of this data must however recognise that the full impact of the Local Plan policies has not yet been felt given the Local Plan was adopted in 2017. Nonetheless, the delivery of 23 affordable homes at Tottenham Mews would reflect c. 12% of the Council's average annual performance, based on most recent data available. This is afforded significant weight in determining the acceptability of off-site provision of housing.

- 5.6 In accordance with Local Plan paragraph 3.56 Tottenham Mews is located in the same ward as the Network Building, being only 500m away. Given the site is located south of the Euston Road where there is typically a scarcity of suitable sites for affordable housing, the close proximity of Tottenham Mews to the Network Building is also considered to weigh favourably when determining the acceptability of off-site provision of housing.
- 5.7 The affordable housing at Tottenham Mews will be constructed, owned and managed by a Registered Provider. A number of affordable partners from the Council's approved list have been involved in the design of the scheme, including layouts, communal areas etc. Combined, this ensures that the service costs are kept to a minimum, protecting long term affordability for affordable residents.
- 5.8 On balance, the provision of significant number of affordable homes, over and above that which would have been possible as part of the standalone redevelopment of the Network Building, within close proximity to the application site, and which have been designed to a high standard in collaboration with Council Officers and Registered Providers, is considered to justify the provision of off-site residential housing.

### **Quantum**

- 5.9 In accordance with Local Plan policy H2 the provision of additional non-residential floorspace triggers a requirement for the provision of self-contained residential floorspace. Where self-contained housing is proposed as part of a mixed-use development, affordable housing will also be sought in accordance with Policy H4.
- 5.10 The Development proposes additional floorspace (residential and non-residential) of 10,533 sq m (please refer to area tables in Section 3 of this AHS). 50% of any uplift in floorspace, or 5,266 sq m (GIA) is required to be self-contained housing, of which 2,633 sq m (GIA) is to be affordable housing.
- 5.11 Finally, the 844 sq m of existing market residential housing at Whitfield Street must also be included in the market residential housing floorspace requirement in accordance with Local Plan policy H3.
- 5.12 When combined together, the aggregated policy requirements in relation to the Development as a whole (i.e. both sites) is 3,477 sq m of market housing (2,633 plus 844) and 2,633 sq m of affordable housing. The approach to calculating the combined policy requirements has been discussed and agreed with Council Planning Officers.

- 5.13 The Development proposes no market housing but includes 2,214 sq m of affordable housing at Tottenham Mews. The shortfall in provision of market housing is considered to be aligned with the Council's housing objectives which prioritise affordable housing over market housing, when considered against the delivery of a wholly affordable scheme at Tottenham Mews.
- 5.14 There is a very small shortfall in affordable housing floorspace of 419 sq m when the target of 2,633 sq m is considered against the provision at Tottenham Mews of 2,214 sq m. A Financial Viability Assessment ("FVA") has been submitted as part of the planning application which demonstrates the Development is providing in excess of the maximum reasonable amount of affordable housing. An FVA was also submitted to the Council as part of pre-application discussions and which was independently reviewed by the Council's viability consultant who agreed with the overall conclusions. Local Plan policies H2 part i) and H4 part o) both give weight to the specific economics and financial viability of development.

### **Affordable tenure**

- 5.15 The Local Plan requirement under Policy H4 part a) in regards affordable tenure is for 60% social-affordable rent and 40% intermediate, calculated by floorspace.
- 5.16 The proposals are for 10 Social Rent homes and 13 Intermediate Rent homes. When considered on a floorspace basis the overall tenure split is 50/50. Policy does allow for flexibility against the target requirements under H4, considering the different criteria at parts j) to p).
- 5.17 As before, viability is a consideration. It has been demonstrated that the current 50/50 provision is the maximum reasonable. In this instance, the tenure split has also been informed by discussions with Registered Providers and the physical configuration of the building. The affordable tenures are currently configured so that the Social Rent homes are arranged over ground, first and second floors, and the Intermediate homes over third, fourth and fifth floors. In order to achieve a 60/40, split the third floor would need to be a mixed tenure floor and the Registered Providers consulted as part of the design process have advised that mixed tenure floors are not suitable from a management perspective.

### **Affordability**

#### *Social-affordable rent*

- 5.18 The Social Rent homes are to be let at London Affordable Rent levels. London Affordable Rent is a housing product introduced by the Mayor of London to replace central government's Affordable Rent product in London, with rents based on traditional social rents.
- 5.19 Benchmark levels for London Affordable Rented are set out the Mayor's Affordable Homes Programme 2016-2021 Funding Guidance (Nov 2016) and updated annually by the increase in the Consumer Price Index plus 1%. The current rents for 2020/21 are as follows:
- 1 bed homes - £159 per week
  - 2 bed homes - £169 per week
  - 3 bed homes - £178 per week

- 5.20 The Council's interim Housing CPG planning guidance notes that the provision of London Affordable Rent as the default rent level of new social-affordable rent homes is supported by the Council.

Intermediate

- 5.21 The 13 Intermediate homes will be provided as Intermediate Rent. This is aligned with the Council's priorities, with the Local Plan and Housing CPG noting that the Council generally seek Intermediate Rent over other forms of Intermediate housing such as Shared Ownership.
- 5.22 The Intermediate Rent homes will be provided in accordance with the Council's Intermediate Housing Strategy (April 2016). This ensures that homes are affordable to households on gross incomes of between £30,000 and £40,000 (adjusted for wage inflation). Rents are calculated on the basis that housing costs (rent and service charges) being no greater than 40% of net income and net income being 70% of gross income. These ratios are consistent with Mayoral guidance set out in the GLA's Annual Monitoring Report.

**Unit mix**

- 5.23 Local Plan Policy H7 aims to secure a range of homes of different sizes, best addressing the Council's housing needs.
- 5.24 The Development addresses the policy requirements through a mix of unit types which respond to the Council's specific housing needs for the different tenures. The mix of unit types has been discussed with both Council Housing and Planning Officers as well as with the Registered Providers consulted during the design process.
- 5.25 The full unit mix is set out below:

Unit type	Tenure	
	Social Rent	Intermediate Rent
1 bed 1 person	-	2
1 bed 2 person	-	3
2 bed 3 person	-	3
2 bed 4 person	6	5
3 bed 5 person	4	-
<b>TOTAL</b>	<b>10</b>	<b>13</b>

- 5.26 The proposal includes a greater proportion of larger homes within the Social Rent component, including 40% as 3-bedroom family homes. Given the dense urban nature of the local environment and level of external amenity space in the local area, as well as the potential for vehicular traffic down the mews, any further provision of family homes is not considered suitable in this instance.
- 5.27 For the Intermediate homes the proposal includes a greater proportion of smaller homes, again in line with Council housing thereby ensuring that homes can be accessed by households on

lower incomes. It is for this reason that the Council do not consider the provision of 3-bedroom intermediate units appropriate in the borough.

- 5.28 In summary, the combination of larger Social Rent homes and smaller Intermediate homes best addresses Council's dwelling size priorities, whilst limiting overall child densities and intermediate housing costs.

### **Design**

- 5.29 Local Plan Policy H6 requires high quality accessible homes to be provided as part of development. This includes requirements in relation to space standards and wheelchair housing.
- 5.30 The affordable homes at Tottenham Mews will meet nationally described space standards, in accordance with the Local Plan and the Mayor of London's Housing SPG and Intend to Publish London Plan. In fact, the majority of homes have been designed so that they exceed the minimum space standards.
- 5.31 In accordance with Local Plan policy H6 part c) 90% of homes will be accessible and adaptable, in line with Building Regulations M4(2). Furthermore, in accordance with H6 part d) 10% of homes will be wheelchair homes or easily adaptable to a wheelchair home, in line with Building Regulations M4(3).
- 5.32 The proposals include two wheelchair homes. These are accessed at ground floor to improve access, as recommended by the Council's accessibility consultant. Both wheelchair homes are to be provided as Social Rent, enabling the scheme to meet an identified need for wheelchair users in social-affordable rented housing.

### **Delivery**

- 5.33 The Applicant has engaged with the Council's approved Registered Provider partners during the pre-application period to ensure the Providers were fully involved in the design process and that the scheme meets their requirements. This included various meetings on design, layouts, unit mix and access. The early engagement with Providers is in accordance with the advice set out in the Council's Interim Housing CPG.
- 5.34 It is proposed to dispose of the Tottenham Mews site to a Registered Provider subject to planning permission being secured. The Registered Provider will then construct, own and manage the affordable homes.

## **6 SUMMARY**

- 6.1 In addressing the policy requirements of Local Plan policies H2 and H4 the proposed Development will see the delivery of 23 affordable homes at Tottenham Mews. The provision of 'off-site' housing is considered acceptable in this instance due, in part, due to the additionality generated by optimising the main application site at the Network Building.
- 6.2 A Financial Viability Assessment has been submitted which demonstrates that the 23 homes proposed are in excess of the maximum reasonable amount.
- 6.3 The provision of 23 affordable homes will positively contribute to meeting the Council's affordable housing targets, who have a requirement for 10,000 affordable homes over a 15-year period.
- 6.4 The affordable homes will meet an identified housing need south of the Euston Road, an area which has historically seen low level of actual affordable housing delivery. The affordable homes will provide a range of unit types and tenures, with both responding to the specific characteristics of the local area and the Council's housing need priorities. Additionally, the commercial floorspace is to be provided as affordable workspace, providing an additional public benefit.
- 6.5 The affordable homes have been designed and developed in close consultation with Council Officers and Registered Providers ensuring that the scheme meets the requirements of affordable residents.
- 6.6 DS2 would be happy to discuss any of the points contained within this AHS.