

# MURPHY'S YARD

AN APPLICATION BY FOLGATE ESTATES LIMITED



**AFFORDABLE HOUSING STATEMENT**

JUNE 2021



## MURPHY'S YARD

### AFFORDABLE HOUSING STATEMENT

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On behalf of Folgate Estates Ltd

June 2021



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## 1 Introduction

- 1.1 Folgate Estates (“the Applicant”) are submitting an Outline Application (“Application”), to enable the redevelopment of Murphy’s Yard (“the Site”).
- 1.2 The Site is located on a 6.22 hectare plot between the Gospel Oak and Kentish Town. The site is currently accessed via Sanderson Close to the northeast of the Site connecting to Highgate Road. Railway tracks run along the south and west of the site, with Kentish Town station adjacent to the southeast boundary and Gospel Oak adjacent to the northwest of the site.

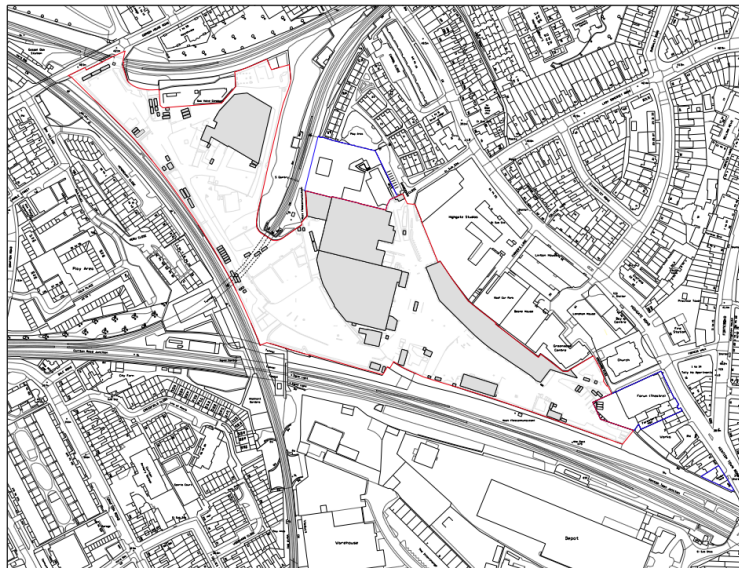
### Detailed Planning Application

- 1.3 The Applicant is submitting an Outline Application as follows:  
*“Outline planning permission with all matters reserved for the demolition of existing buildings and structures and redevelopment to be carried out in phases (with each phase being an independent act of development) comprising the following mix of uses: residential (Use Class C3), residential institution (Use Class C2), industrial (Use Class B2 and/or B8), commercial floorspace (Class E), flexible commercial and Sui Generis floorspace (Use Class E and/or Sui Generis Use), Community (F1 and/or F2), Sui Generis, and cycle and vehicle parking, refuse and recycling storage, plant, highway and access improvements, amenity space, landscape and public realm improvements, and all associated works.”*
- 1.4 The Proposed Development will comprise a mixed-use development comprising a minimum of 750 residential units, over 300,000 sqft of offices, over 300,000 sqft of industrial / storage / R&D space and over 120,000 sqft of healthcare space along with retail and F&B, improved public realm including new pedestrian and cycle routes between Kentish Town and Gospel Oak, connecting to Hampstead Heath.
- 1.5 This Affordable Housing Statement (“AHS”) is submitted in support of the Application and provides a summary of the Proposed Development as well as a review of the planning policy framework pertaining to the delivery of affordable housing.
- 1.6 Information in this AHS is also provided in relation to the affordable housing mix, tenure and affordability is also provided in relation to the affordable housing.
- 1.7 This AHS should be considered alongside other documents, including but not limited to the Studio Egret West Design and Access Statement and the DP9 Planning Statement.

## 2 Site Description

### Location & Existing Use

- 2.1 The Site is located within the administrative boundary of LBC.
- 2.2 The 6.23-hectare site is located between Kentish Town and Gospel Oak, with railway tracks bordering the west, south and north of the Site. The Site is located to the west of Highgate Road and is bounded by Highgate Studios, Highgate Road Businesses and Carrol and Sanderson Close on the east boundary.
- 2.3 The Site is very accessible by public transport. Kentish Town Station, serviced by the Northern Line and Thameslink, is situated at the southeast boundary of the Site, while Gospel Oak Station, serviced by the London Overground, is situated at the northwest boundary of the Site. There are a number of bus routes within the vicinity located at Gospel Oak and Kentish Town offering regular services to Central London and the surrounding area.
- 2.4 The red line plan for the Site is shown below:



- 2.5 Existing access to the Site is via Sanderson Close connecting to Highgate Road running along the east boundary of the Site. Further access point is at the north and south boundaries of the Site. The Site currently comprises an industrial site comprising of an office building, a warehouse, industrial sheds, storage facilities, a canteen and car parking.

### 3 Development Proposals

#### 3.1 The Proposed Development is as follows:

*“Outline planning permission with all matters reserved for the demolition of existing buildings and structures and redevelopment to be carried out in phases (with each phase being an independent act of development) comprising the following mix of uses: residential (Use Class C3), residential institution (Use Class C2), industrial (Use Class B2 and/or B8), commercial floorspace (Class E), flexible commercial and Sui Generis floorspace (Use Class E and/or Sui Generis Use), Community (F1 and/or F2), Sui Generis, and cycle and vehicle parking, refuse and recycling storage, plant, highway and access improvements, amenity space, landscape and public realm improvements, and all associated works.”*

#### 3.2 The Outline Application masterplan proposes a mixed-use development incorporating industrial, office, healthcare and residential uses. The masterplan proposes improved public realm and access with circa one third of the site for public open spaces and cycleways, including the creation of ‘The Heathline’ connecting Kentish Town station to Gospel Oak Station and Hampstead Heath via a new pedestrian way through the Site and a raised cycleway though the east of the Site.

#### 3.3 The proposals seek to enhance the current industrial character of the area by repurposing existing buildings such as the former locomotive sheds with ground floor activation and event spaces and a carefully considered mix of employment spaces and residential uses to activate the Site. The employment space is being delivered speculatively with a wide-ranging tenant profile and spaces envisaged including innovative stacked industrial. For the outline element of the application the massing parameters of the scheme shall be defined with full detailed design to follow with Reserved Matters Applications (“RMAs”). The Proposed Development massing parameters across the Outline Application are as follows:

**OUTLINE APPLICATION MASSING PARAMETERS GEA (SQM)**

Use	Minimum	Maximum
Residential (C3)	750 homes	825 homes
Residential (C3) Floorspace	-	78,410 (excluding ancillary areas) 85,200 (including ancillary areas)
Residential Institution (C2)	-	8,000
Office E(g)(i)	-	34,500
General Industrial and/or Storage and Distribution (B2 and/or B8)	40,461	4,418
Light Industry (E(g)(iii))		14,955
Research and Development E(g)(ii)		21,088
Healthcare E(e) and/or sui generis	-	16,000
Retail and/or commercial E(a), E(b), E(d), E(f) and/or sui generis	-	3,650
Flexible Mixed Use Space	1,300	1,500
Community F1, F2	1,000	1,300
<b>Minimum Floorspace (excluding C3): 42,761 sqm</b>		
<b>Non-Residential Cap: 95,000 sqm</b>		

- 3.4 The Proposed Development delivers a range of residential typologies including higher rise flatted units of up to 19 storeys, low to mid-rise mansion blocks, articulated mews houses and terraced town houses.
- 3.5 It is proposed that 35% of residential units will be affordable housing, subject to viability and the conditions as stated in section 3.21 of the financial viability statement that accompanies the planning application.
- 3.6 All homes will have access to private amenity space in the form of balconies and terraces. The majority of homes will also have communal amenity space including courtyards and winter garden spaces.
- 3.7 Play-spaces will be provided within the communal amenity spaces and public realm.
- 3.8 The Proposed Development shall deliver policy compliant cycle storage for all buildings. Most stores are located facing onto public realm, only Plots C and F will have below ground cycle storage, which will be accessed via bike lifts.
- 3.9 The Proposed Development will be car free due to its public transport, pedestrian and cycle connectivity. The scheme therefore only provides 3% blue badge provision. For the residential units in the north of the site the spaces are provided as off-street under podium secure car parks. There are additionally operational car parking totalling 34 bays for the commercial uses in Plots I, G and H.
- 3.10 The Proposed Development designs provide for servicing, plant, and waste storage at basement levels and at ground floor levels.

#### **Residential Component**

- 3.11 The residential massing parameters are between 750 and 825 homes. An Indicative Scheme by Studio Egret West totals an indicative mix of 752 units. It is proposed that 35% of residential units will be delivered as affordable housing at a policy compliant tenure mix of 40% Intermediate and 60% low cost rent subject to the caveat above and with reference to the financial viability assessment. All Low Cost Rent affordable provision will be provided at London Affordable Rents, while the intermediate element will be delivered at Intermediate Rents.

3.12 The target residential mix is as follows, informed by policy and discussions with LBC.

#### OUTLINE APPLICATION TARGET UNIT MIX

Unit Split		Measure	1B1P	1B2P	2B3P	2B4P	3B5P	4B6P
35% affordable	21% London Affordable Rent	Units %		21%	19%	32%	20%	8%
		Hab. Rooms %		14%	19%	30%	23%	12%
		Floor Area %		16%	17%	33%	23%	11%
	14% Intermediate Rent	Units %	7%	49%		44%		
		Hab. Rooms %	3%	41%		56%		
		Floor Area %	5%	44%		52%		
65% Market		Units %	15%	25%	4%	47%	9%	
		Hab. Rooms %	6%	20%	5%	54%	15%	
		Floor Area %	9%	21%	4%	54%	12%	

3.13 Under the minimum and maximum massing parameters this results in the following numbers of units and habitable rooms.

#### UNIT MIX UNDER MINIMUM MASSING PARAMETERS

Affordable / Market Split		Total Units	Total Hab. Rooms		1B1P	1B2P	2B3P	2B4P	3B5P	4B6P
		750	2,064	Hab. Rooms	2	2	3	3	4	5
35%	21%	158	496	LAR	-	21%	19%	32%	20%	8%
				Units	-	33	30	50	32	13
				Hab. Rooms	-	66	90	151	126	63
	14%	105	256	Intermediate Rent	7%	49%	-	44%	-	-
				Units	7	51	-	46	-	-
				Hab. Rooms	15	103	-	139	-	-
65%		488	1,311	Market	15%	25%	4%	47%	9%	-
				Units	73	122	20	229	44	-
				Hab. Rooms	146	244	59	687	176	-

#### UNIT MIX UNDER MAXIMUM MASSING PARAMETERS

Affordable / Market Split		Total Units	Total Hab. Rooms		1B1P	1B2P	2B3P	2B4P	3B5P	4B6P
		825	2,271	Hab. Rooms	2	2	3	3	4	5
35%	21%	173	546	LAR	-	21%	19%	32%	20%	8%
				Units	-	36	33	55	35	14
				Hab. Rooms	-	73	99	166	139	69
	14%	116	282	Intermediate Rent	7%	49%	-	44%	-	-
				Units	8	57	-	51	-	-
				Hab. Rooms	16	113	-	152	-	-
65%		536	1,443	Market	15%	25%	4%	47%	9%	-
				Units	80	134	21	252	48	-
				Hab. Rooms	161	268	64	756	193	-



### Indicative Scheme Massing

3.14 The residential massing has been modelled on the basis of an indicative scheme of 752 units or 556,546 sqft NIA of C3 use. The exact unit mix and unit numbers will be determined in RMAs. It is proposed that Block C, in Phase 1 of the masterplan is delivered for intermediate rent, securing early delivery of affordable housing. The balance of affordable housing has been modelled across the remaining blocks as shown:

#### RESIDENTIAL ACCOMMODATION BY BLOCK

Block	Total		Market Sale		Intermediate Rent		London Affordable Rent	
	Units	NIA (sqft)	Units	NIA (sqft)	Units	NIA (sqft)	Units	NIA (sqft)
C	28	22,720	0	0	28	22,720	0	0
J	235	172,179	172	126,088	7	3,666	56	42,425
K	127	92,779	81	61,165	18	11,033	28	20,581
L	106	77,310	72	50,967	15	9,194	19	17,149
M	36	26,018	23	17,152	5	3,094	8	5,771
O	41	29,931	26	19,732	6	3,560	9	6,639
P	29	25,343	19	16,708	4	3,014	6	5,622
Q	56	39,893	36	26,300	8	4,744	12	8,849
S	95	70,373	62	46,394	13	8,369	20	15,610
<b>Total</b>	<b>752</b>	<b>556,546</b>	<b>490</b>	<b>364,506</b>	<b>106</b>	<b>69,394</b>	<b>158</b>	<b>122,646</b>

#### OVERALL TENURE MIX

Tenure	Units	% Total Units	NIA (sqft)	% of Total NIA
Market Sale	490	65%	364,506	66%
Intermediate Rent	104	14%	69,394	12%
London Affordable Rent	158	21%	122,646	22%
<b>Total</b>	<b>752</b>	<b>100%</b>	<b>556,546</b>	<b>100%</b>

3.15 The following unit mixes is based on an indicative target unit mix per tenure to accord where possible with policy. For example policy only requires 1- and 2-bedroom intermediate rent units. As previously stated, exact unit numbers and mixes will be determined in RMAs, the below is only indicative of the target mixes.

**OVERALL UNIT MIX**

Unit Type	Number	Avg. NIA (sqm)	Avg. NIA (sqft)	Percentage of Unit Mix
1B1P	77	39	420	10%
1B2P	128	50	538	17%
2B3P	136	61	657	18%
2B4P	248	70	753	33%
3B4P	77	74	797	10%
3B5P	76	86	926	10%
4B6P	14	99	1,066	2%
<b>Total</b>	<b>752</b>			<b>100%</b>

**MARKET UNIT MIX**

Unit Type	Number	Avg. NIA (sqm)	Avg. NIA (sqft)	Percentage of Unit Mix
1B1P	71	39	420	14%
1B2P	40	50	538	8%
2B3P	82	61	657	17%
2B4P	191	70	753	39%
3B4P	58	74	797	12%
3B5P	48	86	926	10%
<b>Total</b>	<b>490</b>			<b>100%</b>

**INTERMEDIATE RENT UNIT MIX**

Unit Type	Number	Avg. NIA (sqm)	Avg. NIA (sqft)	Percentage of Unit Mix
1B1P	8	39	420	8%
1B2P	50	50	538	47%
2B3P	26	61	657	25%
2B4P	22	70	753	20%
<b>Total</b>	<b>106</b>			<b>100%</b>

**LONDON AFFORDABLE RENT UNIT MIX**

Unit Type	Number	Avg. NIA (sqm)	Avg. NIA (sqft)	Percentage of Unit Mix
1B2P	36	50	538	23%
2B3P	26	61	657	16%
2B4P	35	70	753	22%
3B4P	19	74	797	12%
3B5P	28	86	926	18%
4B6P	14	99	1,066	9%
<b>Total</b>	<b>158</b>			<b>100%</b>

3.16 The affordable housing proposals are expanded on in section 5.

## 4 Planning Policy

4.1 The Planning Statement submitted in support of the OPA provides a detailed analysis of the relevant policy framework. The following section of this AHS provides a concise review of the key national, regional and local planning policies that guide the delivery of affordable housing.

### National

#### National Planning Policy Framework

- 4.2 The National Planning Policy Framework (“NPPF”), adopted in February 2019, sets out the Government’s planning policies for England and how they should be applied.
- 4.3 In relation to the delivery of affordable housing, section 20 requires that local planning authorities set strategic policies within their boroughs defining the pattern, scale and quality of development including the delivery of all types of housing including affordable housing.
- 4.4 Section 34 refers to Plans clearly setting out the contributions that are expected from development including the levels and types of affordable housing along with other infrastructure.
- 4.5 Section 59 to 66 seeks to ensure that there is the delivery of a sufficient supply of homes with a requirement for local authorities to identify the need for different types and sizes of affordable housing, including the identification of those households who are eligible for accommodation. Where this need is evidenced, policies should specify the types of affordable housing required with the expectation that affordable homes will be delivered on-site, unless exceptional circumstances exist.
- 4.6 Annex Two of the NPPF provides a glossary for affordable housing and defines affordable housing for rent, starter homes, discounted market sales housing and other affordable housing routes to home ownership.

### Regional

#### The London Plan March 2021

- 4.7 The London Plan introduces a policy framework that responds to the 2017 Strategic Housing Market Assessment that identified an annual need of 43,500 new affordable homes per year.
- 4.8 The approach identified in the London Plan to the delivery of affordable housing and planning viability reflects the approach set out in the Affordable Housing and Viability SPG (2017).
- 4.9 Strategic Policy H1 sets ten-year targets for net housing completions for each local authority to incorporate in their local Development Plan documents.
- 4.10 The London Plan sets a housing delivery target for LBC of net delivery of 10,380 new homes during the period 19/20 to 28/29 equating to 1,038 units per annum. This represents almost 2% of the total targeted delivery across the capital. Data is provided below in respect the current performance against the London Plan target.

- 4.11 Policy H4 seeks to maximise the delivery of affordable housing with a strategic target of 50% of all new homes delivered to be ‘genuinely’ affordable. Developments that trigger the affordable housing requirements should provide affordable housing through the threshold approach (defined in Policy H5).
- 4.12 Policy H4 also provides clarity on the delivery of affordable homes by Registered Providers (RP), and the approach to delivery on industrial and public land. Policy H4 also seeks to ensure that affordable housing is provided on-site unless there are exceptional circumstances.
- 4.13 Policy H5 provides detail on the threshold approach which can be defined as (Part B):
1. a minimum of 35%; or
  2. 50% for public sector land where there is no portfolio agreement with the Mayor; or
  3. 50% for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity.
- 4.14 In order for a Fast Track designation to be achieved, the following must be achieved:
1. meet or exceed the relevant threshold level of affordable housing (as identified in Part B) on site without public subsidy.
  2. be consistent with the relevant tenure split.
  3. meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant.
  4. demonstrate that they have taken account of the strategic 50% target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.
- 4.15 In summary, Fast Track Applications are not required to provide a viability assessment at application stage although an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of the permission. Where an Applicant does not meet the requirements set out in part C it must follow the Viability Tested Route. Viability Tested Schemes will be subject to:
1. an Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough)
  2. a Late Stage Viability Review which is triggered when 75% of the units in a scheme are sold or let (or a period agreed by the borough)
  3. Mid Term Reviews prior to implementation of phases for larger phased schemes.
- 4.16 Part G of the Policy H6 states that where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and undertaken in line with the GLA’s Affordable Housing and Viability SPG.

- 4.17 Policy H6 defines the Mayor’s priorities in respect of affordable housing tenures. The policy requires local authorities to seek the following:
1. a minimum of 30% low cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
  2. a minimum of 30% intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
  3. the remaining 40% to be determined by the borough as low cost rented homes or intermediate products based on identified need.
- 4.18 The GLA further note a preference for their preferred affordable housing tenures as follows:
- Homes based on social rent levels, including Social Rent and London Affordable Rent
  - London Living Rent
  - London Shared Ownership
- 4.19 The products all meet the required definitions of the NPPF, Annex Two.
- 4.20 Policy H10 states that schemes should provide a range of unit sizes and applicants and decision makers should have regard to a range of factors including reference, where available, to robust local evidence in making decisions and the need to deliver mixed and inclusive neighbourhoods, including providing a range of tenures. The process should also be informed by the location of the site, and proximity to, for example, existing and proposed infrastructure, an aim to optimise housing potential on sites, and the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

#### Affordable Housing and Viability Supplementary Planning Guidance (2017)

- 4.21 The GLA published the draft SPG in November 2016 for consultation and the document was subsequently adopted in August 2017.
- 4.22 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 reflects the requirements of the draft London Plan in respect of the delivery of affordable housing across the capital.

#### **Local Policy**

#### Camden Local Plan (2017)

- 4.23 LBC’s affordable housing policy is contained within their Local Plan which was adopted in 3<sup>rd</sup> July 2017.
- 4.24 Section Three of the Local Plan identifies policies that seek to maximise the delivery of new private and affordable homes over the lifetime of the Plan which sets a target to exceed of 16,800 additional new homes, including 11,130 additional self-contained homes.

- 4.25 Policy H4 seeks 50% affordable housing on sites delivering in excess of 25 residential units, the Council may also seek for affordable housing provision to be designated to older people or vulnerable people in part or all of the affordable housing provision.
- 4.26 Policy H4 outlines the affordable housing tenure split should seek to achieve 60% social / affordable rented housing and 40% intermediate provision.
- 4.27 The Local Plan targets 16,800 net new homes over the plan period to 2031, equating to 1,120 units per year.
- 4.28 According to the data published by MHCLG ‘Net additions to dwelling stock’, there were 7,444 net additional dwellings delivered in the ten-year period to 2019/20 equating to 744 dwellings per annum. Current supply is on a downwards trend according to the dataset from a peak of 1,208 dwellings delivered in 2016/17.
- 4.29 The GLA publish data on affordable housing starts and completions by Local Authority. In LBC, there were 141 affordable completions in 2019/20, 216 completions in 18/19, 239 completions in 17/18, 78 completions in 16/17 and 119 completions in 15/16.

The Housing Camden Planning Guidance (January 2021)

- 4.30 The LBC Housing CPG was adopted in October 2021. This CPG provides additional guidance on housing needs, affordable housing provision and the approach to viability through the planning process.
- 4.31 The LBC Housing CPG seeks to align its approach to viability with the regional guidance provided by the GLA. The Local Plan policy H4 and CPG sets out a 50% affordable housing target, however, allows for developments to go forward on the London Plan Policy H5 threshold approach to applications.
- 4.32 The lower percentage threshold will need to consider a range of affordable housing sizes (including family sized homes) and local tenure mix policies.
- 4.33 As set out in Policy H4 of the Local Plan the affordable housing tenure split to be achieved is 60% social / affordable rents and 40% intermediate. The LBC Housing CPG sets out an over aim for social / affordable rented housing to be 50% 3-bedrooms or a preferred mix as follows:
- 1-Bedroom homes – 15% (Maximum)
  - 2-Bedroom homes – 35%
  - 3-Bedroom homes – 30% (or up to 50% if 4-bedroom homes are not provided)
  - 4-Bedroom homes – 20%
- 4.34 The intermediate rented housing preferred mix is for a large percentage of housing to go to Studio flats / 1-bedroom homes in all developments. The Council will support a percentage of 2-bedroom / four-person homes on the basis they are suitable for sharers as well as families. 3-bedroom or more will only be supported by the council if the homes are genuinely affordable.

### **Summary of Planning Policy Context**

- 4.35 In summary, national, regional, and local affordable housing policy support the delivery of the maximum amount of affordable housing that can be viably delivered, alongside other forms of planning gain and CIL.
- 4.36 The Proposed Development proposes 35% affordable housing, including 60% low cost rent and 40% intermediate, and is in accordance with LBC’s tenure mix.

## 5 Affordable Housing

- 5.1 The Applicant is seeking permission for a Proposed Development comprising a mix of uses with a residential component that proposes to deliver 35% affordable housing.
- 5.2 This section of the AHS provides information on the approach to affordable housing including further detail where available in regard to the affordable housing quantum / unit mix; access and amenity strategy; ongoing management and maintenance strategy; and affordability.

### Affordable Housing Quantum & Tenure Split

- 5.3 The Proposed Development comprises a minimum of 750 units and up to 825 units. The Proposed Development will provide 35% affordable housing in a policy compliant tenure split of 60% low cost rent and 40% intermediate on a GIA basis.
- 5.4 The target residential mix is repeated below, summarised against the policy unit mix.

**OUTLINE APPLICATION TARGET UNIT MIX**

Unit Split		Measure	1B1P	1B2P	2B3P	2B4P	3B5P	4B6P
35% affordable	21% London Affordable Rent	Units %		21%	19%	32%	20%	8%
		Hab. Rooms %		14%	19%	30%	23%	12%
		Floor Area %		16%	17%	33%	23%	11%
	14% Intermediate Rent	Units %	7%	49%		44%		
		Hab. Rooms %	3%	41%		56%		
		Floor Area %	5%	44%		52%		
65% Market		Units %	15%	25%	4%	47%	9%	
		Hab. Rooms %	6%	20%	5%	54%	15%	
		Floor Area %	9%	21%	4%	54%	12%	

**Comparison of Policy and Proposed Unit Mix on a Habitable Room basis**

Tenure		Studio	1 Bed	2 Bed	3 Bed+
Low Cost Rent	Policy	-	15%	35%	30% (50% if no 4-beds)
	Proposed	0%	14%	49%	35%
Intermediate	Policy	Large proportion		2B4P units	-
	Proposed	44%		56%	0%
Market Sale	Policy	-	lower	high	high
	Proposed	6%	20%	59%	15%

- 5.5 The target unit mix aligns as closely as possible the policy requirements. Of particular note the target for 3 bed + units for LAR units is exceeded, with additional emphasis on 2 bed provision, rather than an overweighting of 1 bed units in this tenure.



- 5.6 For the intermediate units a large proportion of units are studios and 1 beds in accordance with policy, with only minimal habitable rooms (3%) being studios. Under policy arguably more 1 bedroom intermediate units could be targeted however the intermediate rent mix has favoured 2 bedroom units instead.
- 5.7 The market sale target unit mix provides some 3 bed + units at 15%. This is below the high policy requirement for these unit types, however the majority of the scheme is flatted and car free, which arguably does not suit family housing. Block P provides rows of larger terraced family houses. The market sale mix provides a majority of 2 bedroom units, the vast majority of which are 2B4P units which can provide suitable accommodation for young families.
- 5.8 Under the minimum and maximum parameters the unit mix results in the following unit numbers for the affordable tenures:

**UNIT MIX UNDER MINIMUM AND MAXIMUM PARAMETERS**

Tenure	Total Units	Hab. Rooms	1B1P	1B2P	2B3P	2B4P	3B5P	4B6P
			2	2	3	3	4	5
LAR	158 / 173	% Mix	-	21%	19%	32%	20%	8%
		Min. Units	-	33	30	50	32	13
		Max. Units	-	36	33	55	35	14
Intermediate Rent	105 / 116	% Mix	7%	49%	-	44%	-	-
		Min. Units	7	51	-	46	-	-
		Max. Units	8	57	-	51	-	-

### Affordable Housing Ownership, Management & Design

- 5.9 The homes upon completion will be transferred to the ownership and management of an RP on a lease of 125 years. Typically, the RP market requires low cost rent tenures to be arranged in separate cores in order to manage service charges, to keep these costs to a minimum. Intermediate rent tenures are also often delivered in a separate core for management purposes. Reserved Matters Applications will ensure the appropriate design standards are followed to avoid ‘poor doors’. Detailed design work will ensure standards for play space and amenity space are met.
- 5.10 There will be 10% wheelchair units across the residential accommodation, designed in compliance with part M4(3) of the Building Regulations, with accessible parking spaces. Accessible accommodation will be included within the affordable accommodation.

### Low Cost Rent

- 5.11 LBC has a statutory duty under the Housing Act 1996 to maintain an allocations scheme for determining priorities and for defining procedures to be followed for allocating housing. The allocations scheme must set out the rules for qualifying for social housing and these will vary between areas but there are some general rules set by Government.

- 5.12 It is proposed that the low cost rented component will comprise London Affordable Rent as defined in section 4.6.4 of the London Plan as ‘*London Affordable Rent are for households on low incomes where the rent levels ... are capped at benchmark levels published by the GLA... These homes will be allocated in accordance with need (based on the borough’s allocations policy)*’.
- 5.13 London Affordable Rents for new lettings in 2021/22, exclusive of service charges, are £161.71 for a one bed, £171.20 for a two bed and £180.72 for a three bed property.
- 5.14 This product is consistent with the definition of affordable housing contained within Annex Two of the NPPF.

### **Intermediate Housing**

- 5.15 The intermediate housing is proposed to be intermediate rent in accordance with LBC income criteria which is within GLA income criteria.
- 5.16 The Camden Intermediate Housing Strategy states that the Local Authority will seek to ensure that the majority of intermediate housing in each scheme is affordable to households with incomes between £30,000 and £40,000 (as adjusted by wage inflation). The Council considers housing to be affordable where housing costs (including rent and service charges) take up no more than 40% of net household income (with net income assumed to be 70% of gross income).
- 5.17 In the January 2021 Housing SPG updated the income range to £31,950 to £42,600, which equates to a weekly rent of £171.45 or £228.60 income cap.

### **Summary of Approach to Affordable Housing**

- 5.18 The affordable housing provision is proposed in accordance with LBC policy at 60% low cost rent delivered as LAR units and 40% intermediate delivered as Intermediate Rent units within LBC’s income range. Overall provision is proposed to be 35% of the total residential GIA.
- 5.19 The affordable housing will be delivered in such a way as to ensure that the external appearance of the homes will be indistinguishable from the private homes and the affordability of the homes will be protected.

## 6 Affordable Housing Summary

- 6.1 The Proposed Development envisages a mixed use development including between 750 and 825 residential units. It is proposed that 35% affordable housing on a GIA basis will be provided on a policy compliant tenure split of 60% low cost rent and 40% intermediate by GIA.
- 6.2 On the minimum and maximum parameter this amounts to between 158 and 173 low cost rented units delivered as London Affordable Rent units and 105 to 116 intermediate units delivered as Intermediate Rent units.
- 6.3 The low cost rented element comprises London Affordable Rent and the intermediate accommodation will be delivered as intermediate rent within LBC’s affordability caps.
- 6.4 The residential component of the Proposed Development will make a significant positive contribution to the LBC’s annual housing targets comprising a mix of private and 35% affordable housing.