

O2 Masterplan Site, Finchley Road

Affordable Housing Statement

001 - January 2022

Prepared for LS (Finchley Road) Limited by Quod



Landsec



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Executive Summary

This Affordable Housing Statement (“the Statement”) has been prepared and submitted by Quod on behalf of LS (Finchley Road) Limited (the “Applicant”), to support an application made part in detail and part in outline (the ‘Application’) for the demolition and redevelopment of land encompassing the O2 Centre and associated car park, Homebase store, car showrooms and a Builder’s Merchant (the “Site”) within the London Borough of Camden (‘LBC’).

It has been prepared to demonstrate that the amount, type and mix of affordable housing proposed in the planning application is appropriate for the site and that the development proposal is in accordance with the statutory Development Plan. A summary of the key considerations is set out below.

- **Amount:** The scheme proposes 35% Affordable Housing by floorspace (GIA). This is the maximum reasonable in accordance with Policy H4 of the Camden Local Plan due to financial viability considerations. It also satisfies the criteria for the Fast-Track approach set out in Policy H5 (Threshold Approach) of the London Plan. An early-stage viability review will ensure that the affordable housing provided continues to be the maximum reasonable in the unlikely event of a delay to the commencement of development. The provision of 566 new affordable homes (illustrative) equates to c.42% of LBC annual affordable housing target. It will therefore make a very important contribution to meeting both local and strategic affordable housing need, in a climate where only 22% and 34% of need has been delivered in the last-2 years respectively (GLA AMR, 2021).
- **Tenure Mix:** The scheme proposes 60% Low-Cost Rent and 40% Intermediate tenure by floorspace (GIA). The proposed tenure mix complies with Policy H4 of the Camden Local Plan and Policy H7 (Affordable Housing Tenure) of the London Plan. The provision of 60% of the affordable homes as Low-Cost Rent will make a significant contribution to meeting the priority needs of low-income households including vulnerable households (there are presently over 7,000 households on the council’s waiting list, ONS 2021). This is a significant benefit noting the scheme is anticipated to be Build-to-Rent and is therefore not required to provide any low cost rented homes by national or regional policy. The proposed intermediate homes will meet the growing needs of ‘squeezed middle’ households who cannot afford to buy or rent a good quality suitable home locally but would also be very unlikely to be allocated an existing low-cost rent home (e.g key frontline workers).
- **Unit Mix:** The scheme proposes a mix of affordable housing unit sizes including 52% family sized (3 bedroom+) low-cost rent homes in the detailed element (45-50% in the outline element) alongside a mix of intermediate homes. This is aligned with the approach set out in Camden Planning Guidance 2 (CPG2). The proposed mix will make an important contribution to meeting unmet needs of overcrowded low cost rented households (19.3% of LBC households, Census 2011) and the needs of households on the Council’s Intermediate Housing Register. The proposed mix also supports the viability of the scheme and the quantum of Affordable Housing that can be provided.

- Products & Eligibility:** The low-cost rent homes are proposed to be let at London Affordable Rents allocated to low-income households according to need in accordance with the Council's Housing Allocation scheme. The intermediate homes will be Intermediate Rent (or in the case of the outline element any other type of intermediate housing approved by the council) prioritised in accordance with the objectives of the Council's Intermediate Housing Strategy (i.e to local people). This complies with Policy H4 of the Camden Local Plan, Camden Planning Guidance (CPG2) and Policy H4 of the London Plan. Providing greater flexibility in the outline element of the scheme will ensure it remains viable and deliverable over the long term whilst meeting the most up to date local housing need.
- Affordability:** The low-cost rent homes are proposed to be let at London Affordable Rents published by the Mayor of London. This complies with Camden Planning Guidance 2 (CPG2). The Intermediate Rental homes will be let at rents substantially below market rent at levels which make them affordable to households with dual incomes starting from c.£25,000 per person (£50k dual income). This fully complies with national planning policy (which advocates a 20% discount) and with the definition of genuinely affordable set out in the London Plan and the Mayor's Housing Strategy. Both the low-cost rent and intermediate rents are substantially less than market rents and conventional Affordable Rents. The proposed rents impact the viability of the scheme and have been discussed with the Council's Strategic Partners. The low-cost rent homes will meet the needs of low-income households on the Council's waiting list including those who may be reliant on welfare income. The intermediate homes will meet the needs of local working households who can't afford to buy and/ or rent a suitable good quality home locally who are unlikely to be allocated low-cost rent housing or intermediate rent delivered elsewhere in the borough (e.g key workers).
- Design & Management:** All homes have been designed so they are tenure blind, meet or exceed the design standards set out in the LB Development Plan and are suitable for management by a Registered Provider of Affordable Housing. This complies with the requirements of CPG2, nationally prescribed space standards and, for 10% of the homes, part M4(3) of building regulations. The scheme has also been designed to ensure estate service charges are as affordable as possible, whilst giving residents the option to access on-site amenities. The applicant has been working with the Council's approved Strategic Providers to evolve the scheme to ensure the affordable homes meet the requirements of housing providers and future occupiers.
- Distribution & Phasing:** The affordable housing is distributed across the Site to provide a mixed and balanced community. The scheme will be phased to ensure that the affordable housing is delivered proportionally on a phase-by-phase basis. This is aligned with the objectives set out in Camden Planning Guidance 2 (CPG2). The layout of the development seeks to optimise residential amenity for all tenures and avoids concentrating affordable housing close to potential sources of disturbance. This also accords with the requirements of CPG2. The distribution, layout and phasing of homes has been determined in collaboration with the Council's approved Strategic Providers.
- Grant Funding:** Whilst the applicant may seek grant funding in the future, the provision of 35% is not contingent on the receipt of funding (i.e the S106 agreement will not seek a lower quantum where grant is unavailable).

- **Review Mechanism:** If triggered, an Early-Stage viability review will enable the provision of affordable housing to remain the maximum reasonable amount, with the potential to increase up to the local policy target of 50% subject to future market conditions and delivery timescales.

Overall, this Statement demonstrates the affordable housing proposals are appropriate for the Site and are in accordance with relevant planning policy. The Affordable Housing proposals will make a significant contribution to meeting both local and strategic London Wide housing need and must therefore be afforded substantive positive decision weight in the overall balance.

1 Introduction

- 1.1 This Affordable Housing Statement (“the Statement”) has been prepared and submitted by Quod on behalf of LS (Finchley Road) Limited (the “Applicant”), to support an application made part in detail and part in outline (the ‘Application’) for the demolition and redevelopment of land encompassing the O2 Centre and associated car park, Homebase store, car showrooms and a Builder’s Merchant (the “Site”) within the London Borough of Camden (‘LBC’).
- 1.2 Full details and scope of the Applications is described in the submitted Planning Statement, prepared by Gerald Eve LLP.
- 1.3 This Statement has been prepared to demonstrate the amount, type and mix of affordable housing proposed in the planning application is appropriate for the Site and that the development proposal is in accordance with the statutory Development Plan.
- 1.4 The Statement is structured as follows:
 - An overview of the planning application and relevant policy (Section 2);
 - An analysis of the scheme affordable housing proposals (Section 3); and
 - A summary of the overall conclusions (Section 4).
- 1.5 This Statement should be read in conjunction with a number of the other planning application documents, including but not limited to the Planning Statement and the Design and Access Statement.

2 Application Context

- 2.1 This Section of the Statement provides an overview of the Site, the Proposed Development and relevant planning policy considerations.

Application Site

- 2.2 The Site is located in Finchley Road, within the London Borough of Camden (LBC). It is bounded by Blackburn Road, which envelops the Site along its southern and northern edge, also extending to the west. Finchley Road (A41) bounds the Site to the east, with Billy Fury Way to the west.
- 2.3 The Site is approximately 5.77 ha in size and currently comprises the O2 Centre, which is arranged over three floors and contains a cinema, a mix of retail units, restaurants and cafes, a health club, a community room and a Sainsbury's store; hard-standing, which is used as a car-park with space for 520 vehicles and a Homebase store, and to the western part of the Site are two purpose-built car showrooms and a builder's merchant.

Application Proposals

- 2.4 The Application is for the following Proposed Development:

“Part full and part outline planning permission comprising the following:

Detailed planning permission for Development Plots N3-E, N4, and N5 including demolition of existing above ground structures and associated works, and for residential development (Class C3) and commercial, business and service (Class E) uses in Development Plot N3-E, residential development (Class C3) and local community (Class F2) and commercial, business and service (Class E) uses in Development Plot N4, and residential development (Use Class C3) and commercial, business and service uses (Class E) uses in Development Plot N5 together with all landscaping, public realm, cycle parking and disabled car parking, highway works and infrastructure within and associated with those Development Plots.”

Outline planning permission for Development Plots N1, N2, N3, N6, N7, S1 and S8 including the demolition of all existing structures and redevelopment to include residential development (Class C3) commercial, business and service uses (Class E), sui generis leisure uses (including cinema and drinking establishments) together with all landscaping, public realm, cycle parking and disabled car parking, highway works and infrastructure within and associated with those Development Plots.”

- 2.5 The Application site has been subdivided into 10 Plots (N1, N2, N3, N3-E, N4, N5, N6, N7, S1 and S8). These are identified on Parameter Plan. 19066_X_(02)_102. The 10 plots sit within three indicative phases. Phase 1 covers the Detailed Proposals and is located at the centre of the Site. Phase 2 (also referred to as Outline Phases West) and Phase 3 (also referred to as Outline Phases East) form the Outline Proposals.

- 2.6 In order to demonstrate how the Outline Proposals could come forward as a fully designed scheme that accords with the parameters set out within the Outline Application Framework, an illustrative masterplan has been developed. Based upon the Development plots and the parameters and principles set out in the Parameter Plans and Design Codes, an Illustrative Masterplan has been prepared. The Illustrative Masterplan demonstrates the form of development that could come forward within the parameters and principles. This is just one interpretation of the Outline Application Framework. At the reserved matters stage the scheme may look different, but it will need to confirm to the Outline Application Framework.
- 2.7 The Detailed Proposals will include a total of 55,180 sqm GIA of residential floorspace including an allowance for car parking (use Class C3). The Detailed Proposals will include 608 no. of dwellings.
- 2.8 The Outline Proposals will include up to 115,000 sqm GIA of residential floorspace including an allowance for residential car parking and basements. Therefore, the total residential use across the Site, including residential parking in podiums could be up to 170,180 sqm GIA which for the sake of the Environmental Impact Assessment has assumed that this equates to around 1,800 residential units.
- 2.9 The Proposed Development will provide a mix of housing types including studio, 1, 2, and 3+ bedroom units.
- 2.10 The Application will include a minimum of 35% affordable housing by floorspace (GIA) and habitable room across the Proposed Development. The affordable housing will include Low-Cost Rent and Intermediate Rented Housing at a ratio of 60:40 by floorspace (GIA). A minimum of 50% of the London Affordable Rent housing total will be family, three-bedroom units. Further details of the Affordable Housing proposals are set out in Section 3 of this Statement.

Policy & Guidance

- 2.11 Planning decisions in England are required to be made in accordance with the development plan unless material planning considerations indicate otherwise. The development plan includes the Camden local Plan (2017) and the London Plan (2021). Material considerations include the National Planning Policy Framework (NPPF) (July 2021) and Camden Planning Guidance (CPG). The documents and policies most relevant to the affordable housing proposals are summarised below.

National Policy & Guidance

National Planning Policy Framework (July 2021)

- 2.12 The National Planning Policy Framework provides the national policy for planning in England, including implementing Central Government's housing policy objectives. The NPPF is an important material consideration in the determination of all planning applications. The NPPF directs plans and decision-taking to ensure delivery of a wide choice of high-quality homes for a range of needs for today and in the future (paragraph 8(b)).

- 2.13 Section 5 of the NPPF, 'Delivering a Sufficient Supply of Homes', states that any scheme comprising 5 or more homes should provide affordable housing. It establishes that affordable housing should be delivered on-site.
- 2.14 Annex 2 of the NPPF defines affordable housing as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers). It defines four types of affordable housing: Affordable Housing for rent; Starter homes; Discounted market sale housing; and other affordable routes to home ownership.

National Planning Practice Guidance (As Updated)

- 2.15 The National Planning Practice Guidance (PPG) provides guidance on the application of policies set out in the NPPF. It is a material consideration.
- 2.16 In respect of affordable housing need, the PPG confirms that housing need is an unconstrained assessment of the number of homes needed in an area (PPG Reference ID: 2a-001-20190220). It also confirms that all households whose needs are not met by the market can be considered in affordable housing need (PPG Reference ID: 2a-018-20190220).
- 2.17 More specifically the PPG confirms the need for affordable housing by assessing past trends and current estimates of: the number of homeless households; the number of those in priority need who are currently housed in temporary accommodation; the number of households in over-crowded housing; the number of concealed households; the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration (PPG Reference ID: 2a-020-20190220).

Regional Policy & Guidance

London Plan (2021) (Mayor of London)

- 2.18 The London Plan (2021) provides the overarching strategic planning framework for London. In respect to affordable housing, Policy H4 (Delivering Affordable Housing) states that the strategic target is for 50% of all new homes to be affordable. Specifically, it requires major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach (Policy H5) using grant to increase affordable housing delivery beyond the level that would otherwise be provided.
- 2.19 Policy H5 (Threshold Approach to Applications) confirms that privately owned sites providing at least 35% Affordable Housing are not required to follow the viability tested route. Policy H6 sets out the Mayor's affordable housing tenure mix. Specifically, it states 30% of the affordable homes should be low-cost rent (London Affordable Rent or Social Rent) 30% Intermediate and 40% to be agreed with the borough based on identified need.
- 2.20 The supporting text confirms Intermediate products which meet the definition of genuinely affordable housing which means they must be affordable to households on incomes up to the

level of a specific cap, set in 2021 at £60,000 for products to rent and £90,000 for products to buy, as reviewed and updated through the London Plan Annual Monitoring Report.

- 2.21 Policy H10 (Housing Size Mix) states that schemes should consist of a range of unit sizes having regard to a range of factors including the tenure of housing proposed.
- 2.22 Policy D6 (Housing Quality and Standards) requires new housing development to be of high-quality design, provide adequate-sized rooms, with comfortable and functional layouts, which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- 2.23 Policy GG4 (Delivering the homes Londoners need) supports creating mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs.

Affordable Housing and Viability Supplementary Planning Guidance (SPG) (Mayor of London)

- 2.24 The Mayor's Affordable Housing and Viability SPG ('the SPG') provides guidance to ensure that existing London Plan policy is as effective as possible. It is a material consideration.
- 2.25 The SPG provides guidance on the threshold approach, whereby schemes meeting or exceeding 35% affordable housing (calculated on the basis of habitable rooms), and meeting the tenure split requirements, are not required to submit a viability assessment or have a late-stage viability review.

Affordable Homes Programme 2016- 2023 and 2021- 2026 – Funding Guidance

- 2.26 The Mayor's two funding programmes setting out the requirements that affordable housing providers must meet to receive funding, including rent setting for London Affordable Rent (2016-2023 programme).

Housing Supplementary Planning Guidance (SPG) (Mayor of London)

- 2.27 Guidance on how the Mayor will implement London Plan policies on housing, including residential development standards, accessible housing and specialist housing.

Regional Policy & Guidance

Camden 2025 Vision (2018)

- 2.28 In 2018 Camden Council published a 2025 'Vision'. This was informed by engagement with local communities and a Citizens' Assembly. The Vision emphasises the positives of the Borough rooted in its people and communities and its diversity. The five year action plan for 2018 to 2022 (Our Camden Plan) includes actions to:
- Build as many genuinely affordable homes as we can as quickly as we can, and help others (including housing associations and developers) to do so as well. We will build more affordable homes than we have done in a generation.
 - Do all we can to help young people who have grown up here, or who have strong connections to the borough, to gain a foothold in Camden and build their adult lives here.

Camden Local Plan (2017)

- 2.29 The Camden Local Plan (2017) sets out the Council's vision for the borough and planning policies. It forms part of the development plan. A key strategic objective of the plan is Providing homes that meet the housing needs of existing and future residents in terms of number, affordability, quality, type of property and mix of dwelling sizes;
- 2.30 Policy H4 (Maximising the supply of affordable housing) of the Local Plan confirms the Council will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100 sq m GIA or more, including mixed-use developments.
- 2.31 Policy H4 also sets out criteria which will be used to assess the appropriate contribution to affordable housing from each development. These include:
- applying an affordable housing target of 50% of additional residential floorspace to developments with capacity for 25 or more additional homes;
 - the guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing;
 - seeking to negotiate the maximum reasonable amount of affordable housing under the specific circumstances of the site, including the financial viability of the development;
 - aiming to minimise social polarisation and create mixed, inclusive and sustainable communities;
- 2.32 Policy H6 (Housing Choice & Mix) of the Local Plan and accompanying paragraphs 3.154 - 3.155 set out the Council's requirements in relation to the nationally described space standards, accessible and adaptable dwellings, and wheelchair user dwellings.
- 2.33 Policy H7 (Large and Small Homes) confirms the Council will expect a mix of large and small homes in all housing development, and seek a range of self-contained homes to meet identified dwelling size priorities.

Camden Planning Guidance 2 Housing (January 2021)

- 2.34 Camden Planning Guidance on Housing (CPG2) is a Supplementary Planning Document (SPD) which provide guidance on the interpretation and application on policy within the Camden Local Plan (2017). It is a material consideration in planning decisions but clearly attracts less weight than the policies in the Local Plan.
- 2.35 Key areas of guidance set out within CPG2 include confirmation that:
- the Council may have regard to the London Plan threshold approach where appropriate, particularly in relation to strategic developments
 - the Council will support the provision of London Affordable Rent homes as a form of social-affordable rented housing.
 - The Council prefers the intermediate homes to be intermediate rent.
 - Affordable homes should be transferred to a provider from the Council's Approved Strategic Partner List (July 2020 as updated)

- The Council aims for 50% of social-affordable rented homes to be large homes with 3-or-or more bedrooms and will also place a high priority on securing smaller homes with two bedrooms (suitable for 4 persons) for social-affordable rent.
- The Council prefers most homes for intermediate rent to be 1 bedroom or 2 bed flats and will give high priority to studio and one-bedroom homes. 90% of need on the Intermediate Housing Register is for 1 and 2 beds.
- Where schemes involve both social-affordable rented housing and intermediate housing, it may often be appropriate to have a high proportion of intermediate homes that are studios or one-bedroom homes and a high proportion of social-affordable rented homes with three bedrooms or more.
- The precise mix of dwellings will be negotiated with the developers and affordable housing providers involved in each scheme.
- To be eligible for intermediate rented housing, a household's gross annual income should not exceed the London Plan maximum of £60,000 for intermediate rented housing.
- The council will seek a range of rents appropriate to the particular homes in each scheme;
- Low cost rent homes should be allocated in accordance with the council's Housing Allocation Scheme (2018, as updated)
- Providers are expected to market any intermediate homes that become available to people on the Register of Interest.
- Applicants should engage with Registered Providers at the earliest stages of housing design
- Occupation of all market homes in the development should not take place until the affordable homes have been transferred to the selected provider;
- Development should be tenure blind, using a common design approach, with high quality materials and finishes throughout.
- Market and affordable blocks should be spread evenly across the site. The layout of the development should optimise residential amenity for all tenures.
- At least 10% of affordable homes should be designed to comply with Building Regulation M4(3) for wheelchair user dwellings

Intermediate Housing Strategy (July 2020)

2.36 The strategy sets out the Council's approach to the supply and allocation of submarket housing in Camden. It seeks to meet the aspirations set out in the Camden Plan and taken forward by the Camden Equalities Taskforce to deliver suitable and affordable housing to middle income households.

2.37 The Equalities Taskforce saw intermediate housing (IH) as meeting 'the needs of low and middle income groups' who were 'very unlikely to secure' social housing. The Taskforce highlighted the importance of maintaining the social mix of Camden, identifying its potential to build community cohesion and enhance individuals' life chances. It is now common to hear reports of low and middle income workers like key works such as teachers, nurses and even doctors who are unable to live in Camden.

2.38 The strategy seeks to ensure that intermediate housing can be delivered viably and affordably to the 'squeezed middle' of working households on low and middle incomes in Camden, thus helping to maintain cohesive communities and the diversity of the borough's population.

2.39 The strategy confirms that the Council will:

- encourage all developers to provide Intermediate Rent;
- encourage providers to adopt an approach to intermediate rent within a range of rent levels from 40% to 80% of market rent
- encourage all providers and developers to minimise service charges in order to enhance affordability
- encourage some provision of well-designed studio as well as one-bedroom accommodation to meet the needs of single households or couples
- encourage developers to design good quality two bedroom units suitable for sharing households
- Expect providers of IH to market their units to people registered on Intermediate Register and any other groups as specified by the council, in the first instance.
- Expect providers to let Intermediate Rent units in accordance with the Priority Matrix set out in Schedule 1. 6.22 which prioritises Camden residents over non-Camden residents and non-Camden residents who have worked in the borough for the last six months over those who haven't, in recognition of the contribution that keyworkers from outside the borough make to Camden.

Camden Draft Statement on Intermediate & First Homes (2021)

2.40 The Council is consulting on a draft Planning Statement on the Intermediate Housing Strategy and First Homes. The draft statement sets out the proposed approach to these types of housing to guide the implementation of Camden planning policies and the assessment of planning applications. The draft statement is a material consideration. The weight to be attached to it will increase as it progresses through the approval process.

- Since the beginning of 2018, the Council's intermediate rent strategy has delivered over 130 intermediate rent homes, the majority of lettings have been to households with annual incomes below £40,000 (gross), and significant proportions of lettings have been to people working in the health sector and those who previously lived in social housing.
- Over 950 people were registered on the Council's intermediate housing register of interest at the start of October 2021 of which over 41% had incomes of £40,000 or more, 41% worked in health or education; 61% were borough residents, the households specifically seeking shared ownership had higher incomes (80% had gross annual incomes of £60,000 or more);
- The Council does not consider First Homes to be a suitable form of affordable housing for delivery in Camden, and will not seek the inclusion of First Homes in developments in the borough, or expect 25% of affordable homes to take the form of First Homes.

Financial Viability

- 2.41 The Proposed Development proposes 35% affordable housing in a 60/40 tenure split. The Site does not include any industrial or public land. The Proposed Development therefore satisfies the criteria for the Fast-Track threshold approach set out in Policy H5 of the London Plan (2021).
- 2.42 Notwithstanding compliance with Policy H5 of the London Plan (2021), the application is supported by a Financial Viability Assessment (FVA). The FVA demonstrates that the affordable housing proposals exceed the level that is considered viable in the FVA which has been undertaken. This is a significant benefit of the Proposed Development. Further details are set out in the submitted Gerald Eve FVA.

Housing Need

London Wide Need

- 2.43 The London Plan Strategic Housing Market Assessment (2017) demonstrates that London has significant unmet need for affordable housing and has identified that 65% of need is for affordable housing.
- 2.44 The London Plan (2021) sets a strategic capacity limited target to deliver at least 26,244 affordable homes across London per annum (50%). The latest London Plan AMR (AMR 16, 2021) confirms delivery of new affordable housing on a London-wide basis is significantly below the new London Plan target with only 22% of the new target being achieved between 2016/17 and 2018/19 (16% of the number of homes delivered).

Table 2.1 - London Net Additional Affordable Housing Delivery (London Plan AMR 16)

Total Completions	2016/17	2017/18	2018/19	Total
Affordable Homes Target	26,244	26,244	26,244	78,732
Affordable Homes Delivered	6,827	4,237	6,509	17,573
Proportion of Target Delivered (%)	26%	16%	25%	22%

- 2.45 There is therefore a significant need to increase the delivery of affordable homes above the current rate of just 22% of new supply to meet London wide housing need.**

Local Housing Need

- 2.46 The Camden Strategic Housing Market Assessment (SHMA) (2016) identified an objectively assessed need for 2,040 affordable homes per annum. In accordance with Policy H4 of the London Plan (2021) Camden's housing target is for 50% of all homes to be Affordable Housing (1,334 per annum).
- 2.47 The London Plan AMR confirms 660 affordable homes were delivered between 2016/17 and 2018/19 equating to 32.3% of the SHMA target and 49.5% of the London Plan Target.

Table 2.2 - Camden Net Additional Affordable Housing Delivery (London Plan AMR 16)

Total Completions	2016/17 – 2018/19
Affordable Homes Delivered (GLA AMR 16)	660
Camden SHMA 2016 Target	2,040
Proportion of SHMA Target Delivered (%)	32.3%
Affordable Homes Target (50% of LP Target)	1,334
Proportion of LP Target Delivered (%)	49.5%

2.48 There is therefore a clear need to increase the delivery of affordable all types and tenures in Camden to meet boroughwide housing need.

2.49 In respect of mix, the Camden Strategic Housing Market Assessment (SHMA) (2016) identified that there was a significant unmet need for larger social-affordable rented tenures due to the high level of overcrowding in existing social housing (the 2011 Census showed 19.3% of LBC households were overcrowded based on bedroom occupancy).

2.50 There is therefore a clear un-met need for the delivery of larger low cost rented homes in the borough to meet priority needs.

2.51 The 2016 SHMA did not identify a need for intermediate housing due to the definitions being used at the time (as noted in CPG2). Since preparation of the 2016 SHMA, national planning policy has been updated to confirm affordable housing need must include the number of households from other [non affordable] tenures in need (i.e those living in unsuitable private rented homes) and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.

2.52 Furthermore, house prices and private rents have increased substantially in Camden in recent years. The combined household income required to access a good quality suitable private home is in excess of £60k for private rent and £90k for private sale in many parts of the borough including the West Hampstead Ward.

2.53 As a consequence, there are now a very large number of ‘squeezed middle’ households who have incomes which mean they are unable to afford to buy or rent a good quality suitable home but would be unlikely to be allocated social housing which is prioritised for those households with lower incomes (up to c.£30k) (CACI 2020).

2.54 This has resulted in increased demand and pressure on the private rented sector (PRS) housing evidence by the high levels of private rented homes compared to London as a whole (32% compared to 25% respectively). This is reflected at the local level with 42% of homes privately rented. The existing rental offer is however insufficient in scale, availability, quality and affordability to meet local need.

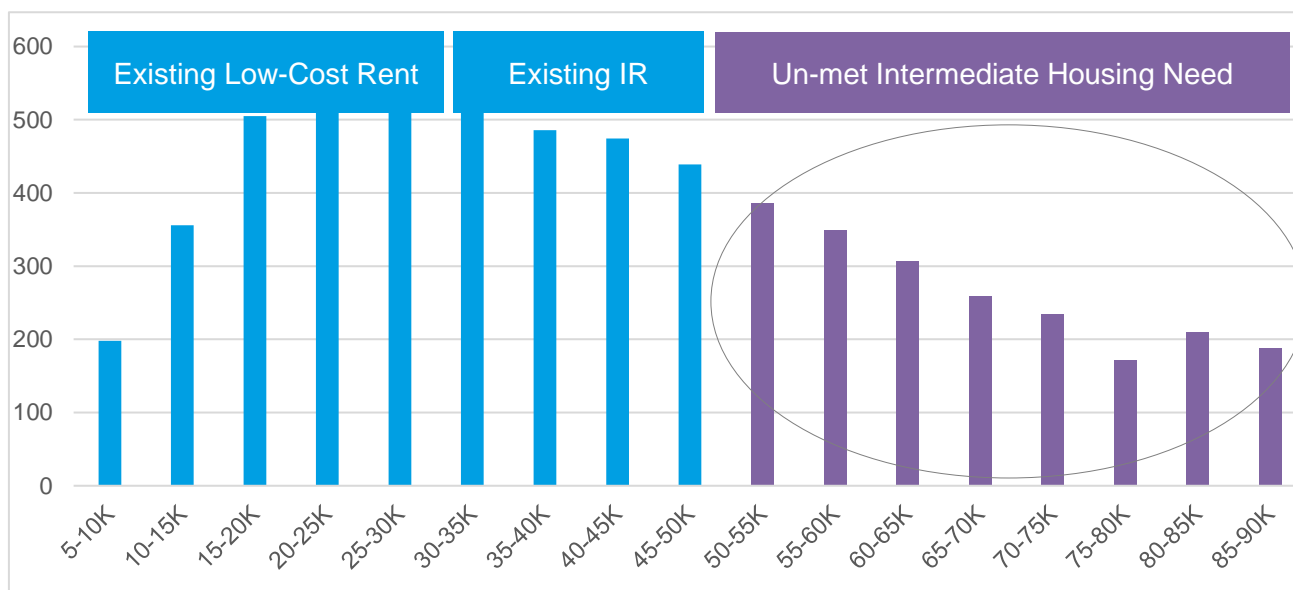
2.55 Whilst these households would be eligible for intermediate housing less than c.1% of existing housing in both the borough and ward is presently intermediate (few of which are understood to be intermediate rental properties). The majority of existing intermediate rented housing (‘Existing IR’) delivered to date have also typically targeted lower incomes of c.£30-£50k households as confirmed in the Council’s recently published Draft Statement on Intermediate & First Homes (2021).

2.56 Lack of good quality private rental housing and intermediate housing options for households, including those which target dual income households with incomes from c.£50k-£90k (c.£25-45k per person on average) is contributing to a range of local housing issues including:

- Loss of young working age people/ break up of existing communities;
- Difficulty attracting/ retaining workers (inc key frontline workers such as doctors) having a negative impact on local business and delivery of front line services;
- Increased pressure & overcrowding in lower quality/ insecure buy-to-let rental housing which is typically unsuitable;
- Increased pressure on the conversion of suitable family homes to flats to meet growing demand;
- Increasing numbers on the Council’s intermediate waiting list who are unlikely to be allocated a home;

2.57 This is particularly prevalent for households in the West Hampstead Ward (where house prices are very high) as illustrated in Figure 1 below. There are 2,130 households in this group in the Ward and 30,120 in the borough (CACI 2021).

Figure 1 – West Hampstead Ward Household Incomes & Products (CACI 2021)



2.58 Many of these households are likely to be key workers comprising dual income households with entry level wages (Table 2.3) or single income households earning median incomes (Table 2.4).

Table 2.3 – Key Worker Incomes (Dual Income)

Occupation	Entry Level Single Income (ASHE 2020)	Dual Household Income Illustration
Police Officer	£27,731	£55,462
Health Professional	£26,485	£52,970
Teacher	£25,690	£51,380

Table 2.4 – Key Worker Incomes (Single Income)

Occupation	Median Single Income (ASHE 2021)
Train/ Tram Driver	£59,339
Higher Education Teacher	£57,797
Police Officer	£55,514
Rail Transport Operative	£53,564
Health & Social Service Manages	£50,941

2.59 There is therefore a clear un-met need for local households who earn combined dual household incomes between c.£50-£90k (c.£25-45k per person on average) particularly including key workers.

Further Information

2.60 Further details of the Site, the Proposed Development and relevant planning policy considerations are set out in the Planning Statement.

3 Affordable Housing Proposals

3.1 This Section of the Statement provides the Affordable Housing proposals and analysis against relevant policy and other material planning considerations.

Quantum

3.2 The Proposed Development proposes 35% Affordable Housing by floor area (GIA) in both the detailed and outline elements.

3.3 The breakdown of units and habitable rooms in the detailed element of the scheme is provided in Table 3.1 below. This will be secured in the S106 agreement.

Table 3.1 – Affordable Housing Amount (Detailed Scheme)

Type	Units	Habitable Rooms	% Habitable Room	Floor Area (GIA SQM)	%Floor Area (GIA SQM)
Private	420	1,002	64%	35,754	65%
Affordable	188	567	36%	19,426	35%
Total	608	1,569	100%	55,180	100%

3.4 The proposed affordable housing requirement for the outline element of the scheme is provided in Table 3.2 below. This will be secured in the S106 agreement.

Table 3.2 – Affordable Housing Amount (Outline Parameters)

Type	% Habitable Room	% Floor Area (GIA)
Private	65%	65%
Affordable	35%	35%
Total	100%	100%

3.5 The breakdown of units and habitable rooms in the illustrative proposals for the outline element of the scheme is provided in Table 3.3 below. This is indicative only and will be subject to confirmation within the later Reserved Matters Application.

Table 3.3 – Affordable Housing Amount (Outline Illustrative)

Type	Units	Habitable Rooms	% Habitable Room	Floor Area (GIA SQM)	% Floor Area (GIA SQM)
Private	810	1,937	63%	75,108	65%
Affordable	378	1,136	37%	39,302	35%
Total	1,188	3,073	100%	114,410	100%

3.6 The breakdown of units and habitable rooms where the proposals for the detailed element of the scheme are combined with in the illustrative proposals for the outline element of the scheme is provided in Table 3.4 below. This is indicative only and will be subject to confirmation within the later Reserved Matters Applications.

Table 3.4 – Affordable Housing Amount (Detailed & Outline Illustrative Combined)

Type	Units	Habitable Rooms	% Habitable Room	Floor Area (GIA SQM)	%Floor Area (GIA SQM)
Private	1,230	2,939	63%	110,862	65%
Affordable	566	1,703	37%	58,728	35%
Total	1,794	4,642	100%	169,590	100%

3.7 The quantum of affordable housing is appropriate having regard to the following factors:-

- **Local Plan:** The proposals fully accords with Policy H4 of the Camden Local Plan due to financial viability considerations as evidenced in the FVA submitted with the application.
- **London Plan:** The proposals satisfy the requirements of the 35% Fast Track Threshold Approach set out in Policy H5 of the London Plan (2021).
- **Review Mechanisms:** The inclusion of an early-stage viability review will, if it is triggered, provide an opportunity for the quantum of affordable housing to increase up to 50% (subject to delivery timescales and future viability).
- **Housing Need:** The provision of 556 new affordable homes (illustrative) equates to c.42% of LBC annual affordable housing target (4.2% of the 10-year target). It will therefore make a very important contribution to meeting both local and strategic housing need of which only 22% and 34% of need has been met in the last 2 years respectively
- **Grant Subsidy:** Whilst the applicant may seek grant funding, the provision of 35% in the planning consent is not contingent on the receipt of funding.

Tenure Split

3.8 The Proposed Development proposes 60% Low-Cost Rent and 40% Intermediate measured by floor area (GIA) in both the detailed and outline elements of the application. The breakdown of units and habitable rooms in the detailed element of the scheme is provided in Table 3.5 below. This will be secured in the S106 agreement.

Table 3.5 – Tenure Mix (Detailed Scheme)

Type	Units	Habitable Rooms	% Habitable Room	Floor Area (GIA)	% Floor Area (GIA)
Low-Cost Rent	104	352	62%	11,638	60%
Intermediate	84	215	38%	7,788	40%
Total	188	567	100%	19,426	100%

3.9 The proposed tenure split requirement for the outline element of the scheme is provided in Table 3.6 below. This will be secured in the S106 agreement.

Table 3.6 – Affordable Housing Amount (Outline Parameters)

Type	% Floor Area (GIA)
Low-Cost Rent	60%
Intermediate	40%
Total	100%

3.10 The breakdown of units and habitable rooms in each tenure of the illustrative proposals for the outline element of the scheme is provided in Table 3.7 below. This is indicative only and will be subject to confirmation within the later Reserved Matters Applications.

Table 3.7 – Tenure Mix (Outline Illustrative Scheme)

Type	Units	Habitable Rooms	% Habitable Room	Floor Area (GIA)	% Floor Area (GIA)
Low-Cost Rent	211	675	59%	23,681	60%
Intermediate	167	461	41%	15,621	40%
Total	378	1,136	100%	39,302	100%

3.11 The breakdown of units and habitable rooms where the proposals for the detailed element of the scheme are combined with in the illustrative proposals for the outline element of the scheme is provided in Table 3.8 below. This is indicative only and will be subject to confirmation within the later Reserved Matters Applications.

Table 3.8 – Tenure Mix (Detailed & Outline Illustrative Combined)

Type	Units	Habitable Rooms	% Habitable Room	Floor Area (GIA)	% Floor Area (GIA)
Low-Cost Rent	315	1,027	60%	35,319	60%
Intermediate	251	676	40%	23,409	40%
Total	566	1,703	100%	58,728	100%

3.12 The quantum of tenure mix of affordable housing is appropriate having regard to the following development plan policies and other relevant material considerations: -

- **Local Plan:** The proposed tenure mix complies with Camden Local Plan Policy which requires 60% Social or Affordable Rented Housing and 40% Intermediate by floor area (GIA).
- **London Plan:** The proposed tenure mix complies with the Policy H7 (Affordable Housing Tenure) of the London Plan (2021) which requires a minimum of 30% London Affordable Rent.
- **Housing Need:** The provision of 60% Low-Cost Rent will make a significant contribution to meeting the priority needs of low-income households including vulnerable households (there are over 7,000 households on the council’s waiting list, ONS 2021). It is a significant benefit noting Build-to-Rent schemes are not required to provide any social rented homes by national or regional policy. The intermediate homes will meet the growing needs of ‘squeezed middle’ households who cannot afford to buy or rent a good quality suitable home but would be very unlikely to be allocated an existing low-cost rent home (e.g key frontline workers).
- **Balanced Community:** The proposed tenure mix will support a more mixed and balanced community, in an area which presently has less than 1% intermediate housing, build community cohesion and enhance individuals’ life chances in accordance with the objectives of the Council’s intermediate housing strategy.

Unit Size Mix

3.13 The Proposed Development proposes a mix of affordable housing unit sizes including c.45-50% family sized (3 bedroom+) low-cost rent homes. The mix is set out in Table 3.9 below. This will be secured in the S106 agreement.

Table 3.9 – Unit Size Mix (Detailed Scheme)

	Studio	1 Bed	2 Bed	3 Bed	Total
Low-Cost Rent	0	14	36	54	104
	0%	13%	35%	52%	100%
Intermediate Rent	0	48	25	11	84
	0%	57%	30%	13%	100%

3.14 The proposed unit mix requirement for the outline element of the Proposed Development is provided in Table 3.10 below. This will be secured in the S106 agreement.

Table 3.10 – Unit Size Mix (Outline Parameters)

	Studio	1 Bed	2 Bed	3 Bed	Total
Low-Cost Rent	0-5%	0-25%	20-25%	45-50%	100%
Intermediate	0-20%	0-30%	20-40%	0-15%	100%

3.15 The indicative breakdown of units in the illustrative proposals for the outline element of the Proposed Development is provided in Table 3.11 below. This is indicative only and will be subject to confirmation within the later Reserved Matters Applications.

Table 3.11 – Unit Size Mix (Illustrative Outline Scheme)

	Studio	1 Bed	2 Bed	3 Bed	Total
Low-Cost Rent	4	51	59	97	211
	2%	24%	28%	46%	100%
Intermediate	8	52	79	28	167
	5%	31%	47%	17%	100%

3.16 The indicative breakdown of units sizes where the proposals for the detailed element of the Proposed Development are combined with in the illustrative proposals for the outline element of the scheme is provided in Table 3.12 below. This is indicative only.

Table 3.12 – Unit Size Mix (Detailed & Illustrative Outline Combined)

	Studio	1 Bed	2 Bed	3 Bed	Total
Low-Cost Rent	4	65	96	152	315
	1%	21%	30%	48%	100%
Intermediate	8	100	104	39	251
	3%	40%	41%	16%	100%

3.17 The unit size mix of affordable housing is appropriate having regard to the following factors: -

- **Local Guidance:** The provision of c.45-50% family sized low-cost rent housing and priority for a smaller mix of intermediate homes is closely aligned with the preferences set out in CPG2. CPG 2 also notes that where a high proportion of social-affordable rented homes are proposed it may often be appropriate to have a high proportion of smaller intermediate homes to manage child density.
- **Housing Need:** The provision of c.45-50% family sized low-cost rent housing (indicatively 152 new homes) will make a significant contribution to meeting un-met needs of overcrowded social rented households (19.3% of LBC households, Census 2011). The provision of smaller intermediate units will also meet the needs of the majority of households on the Councils Intermediate Housing Register.
- **Design & Viability:** The mix of unit sizes supports the viability of the scheme. Any changes (i.e additional larger homes) could result in a less efficient scheme constraining viability and the quantum of Affordable Housing that can be provided.

Products & Eligibility

3.18 The application proposes a mix of affordable housing products including London Affordable Rent (LAR) and Intermediate Rent (IR). The proposed products and eligibility for the detailed element of the Proposed Development are set out in Table 3.13 below. This will be secured in the S106 agreement.

Table 3.13 – Detailed Scheme Products & Eligibility

Tenure	Product	Eligibility
Low-Cost Rent	London Affordable Rent	Homes are allocated to households on low incomes in accordance with need (based on the Council's Housing Allocation Scheme)
Intermediate	Intermediate Rent	Homes prioritised to households on the Council Intermediate Waiting List with a maximum combined income of £60,000 (index linked)

3.19 The products in the outline element of the Proposed Development will be the same. Flexibility for the intermediate tenure to be Intermediate Rent or any other intermediate product approved by the Council is however proposed, as illustrated in Table 3.14 below.

3.20 The exact products proposed in the outline element of the Proposed Development will be determined at the RMA stage. The process for determining the mix, and the relevant considerations (i.e feasibility and viability), will be set out in the S106 legal agreement.

Table 3.14 – Outline Scheme Products & Eligibility

Tenure	Product	Eligibility
Low-Cost Rent	London Affordable Rent	Homes are allocated to households on low incomes in accordance with need (based on the Council's Housing Allocation Scheme)
Intermediate	Intermediate Rent or Any Other Approved Product	Homes prioritised to households on the Council Intermediate Waiting List with a maximum combined income of £60,000 (index linked) for

		rental products and £90,000 (index linked) for ownership products.
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3.21 The proposed affordable housing products in both the detailed and outline elements of the Proposed Development are appropriate having regard to the following factors: -

- **Local Plan:** Policy H4 allows the low-cost rental element of the scheme to be London Affordable Rent.
- **London Plan:** Policy H4 of the London Plan confirms that the low-cost rent element can be entirely London Affordable Rent. This is also confirmed in the Mayors Housing Strategy (2018).
- **Local Guidance:** CPG2 confirms the Council will support the provision of London Affordable Rent homes as a form of social-affordable rented housing. It also confirms (para 3.11) Intermediate homes are expected to be Intermediate Rent let in accordance with the Intermediate Rent Strategy.
- **Housing Need:** Local Housing Need evidence demonstrates there is a clear need for both Low-Cost Rent homes (due to existing waiting lists and levels of overcrowding) and intermediate tenures including Intermediate Rent (due to increasing numbers who cannot afford to buy or rent).
- **Financial Viability:** The proposed products support the financial viability of the scheme. Any reduction in rental income would require the quantum and or tenure mix to be adjusted.
- **Deliverability:** Providing flexibility in the outline element of the Proposed Development for the intermediate tenure to be any product approved by the council will ensure the outline element of the scheme remains viable and deliverable and can meet up to date local housing need (using new innovative intermediate housing products where appropriate).

Affordability

3.22 The London Affordable Rent (LAR) homes will be let at rents set and prescribed by GLA. The Intermediate Rent homes will be set at a range of fixed discounts. This will be secured in the S106 Agreement.

Table 3.15 – Product Rent Setting

Product	Rents
London Affordable Rent	Set at benchmark levels published by the GLA in the Affordable Homes Programme 2016 Indexed by CPI + 1%
Intermediate Rent	Set at fixed percentage (%) of Market Rent (as defined by the RICS)

3.23 The indicative rents and discounts are set out in Table 3.16 below. The discounts are based on the GLA rent map. The exact discounts for the intermediate rental units will be agreed through the viability process. The intermediate rent discounts will be secured in the S106 agreement.

Table 3.16 – Indicative Product Rents/ Discounts

	1 Bed	2 Bed	3 Bed
London Affordable Rent	£162 PW	£178 PW	£181 PW
	44% of MR	38% of MR	27% of MR
Intermediate Rent	£270 PW	£300 PW	£320 PW
	73% of MR	64% of MR	48% of MR

3.24 The London Affordable Rent homes will be affordable to households who may be reliant on welfare income. The indicative minimum incomes required for the Intermediate Rent homes is set out in Table 3.17 below.

Table 3.17 – Intermediate Rent Indicative Incomes

Household Type	1 Bed	2 Bed	3 Bed
Dual Income	£25,000	£27,750	£29,750
Single Income	£50,000	£55,500	£59,500

3.25 The proposed affordability is appropriate having regard to the following: -

- **Local Guidance:** CPG2 confirms London Affordable Rent should be set in accordance with the benchmark levels published by the GLA. It also confirms that Intermediate rent should be set at a range of rents appropriate to the particular homes ensuring they are affordable to households with gross annual household incomes of no more than £60,000 per year (as updated) with a preference for lower incomes.
- **London Plan:** The proposed low-cost rents are in line with those set by the GLA in accordance with the London Plan. The intermediate rents are considerably below 80% of Market Rent and will be affordable to households with incomes below £60,000. They therefore meet the definition of genuinely affordable set out in the London Plan and the Mayor’s Housing Strategy.
- **National Policy:** National planning policy confirms an appropriate benchmark for discounted (intermediate) rental products is a 20% discount to market rent.
- **Affordability:** Both the low-cost rent and intermediate rents are substantially less than market rents and conventional Affordable Rents. The intermediate rental homes are also significantly more affordable than private sale equivalents.
- **Financial Viability:** The proposed rents support the financial viability of the scheme. Any reduction in rental income would require the quantum and or tenure mix to be adjusted.
- **Management:** The proposed rents have been discussed with the Council’s Strategic Registered Providers of Affordable Housing.
- **Housing Need:** The proposed low-cost rent homes (£161 - £181 PW) will meet the needs of low-income households on the Councils waiting list who may be reliant on welfare income. The intermediate homes (£270 - £320 PW) will meet the needs of local households who can’t afford to buy and/ or rent a good quality suitable home locally who are unlikely to be allocated low-cost rent housing or intermediate rent delivered elsewhere in the borough (e.g key workers or families with two low incomes).

Design & Management

3.26 All homes have been designed so they are tenure blind, meet or exceed the design standards set out in the London Plan (March 2021) and are suitable for management by a Registered Provider. The design and management proposals for both the detailed and outline element of the are summarised in Table 3.18 below. This will be secured in the S106 agreement.

Table 3.18 – Management Proposals

Product	Design	Management
London Affordable Rent	Tenure Blind 10% M4(3)	Camden Registered Provider Any other approved Registered Provider
Intermediate	Tenure Blind 10% M4(3)	Camden Approved Strategic Provider Any other approved Registered Provider Any other approved BtR Operator

3.27 The design and management of affordable housing is appropriate having regard to the following factors: -

- **Tenure Blind** The proposals accord with CPG2 which confirms affordable homes should be tenure blind using a common design approach, with high quality materials and finishes throughout.
- **Equality:** All homes will be tenure blind and all residents will have the opportunity to access the same high-quality amenities and open space. The affordable housing will include 10% wheelchair accessible housing to M4(3) standards.
- **Affordability:** The Proposed Development has also been designed to ensure estate service charges are as affordable as possible, whilst allowing all residents the right to access on-site amenities. This also accords with the requirements of CPG2 which requires service charges to be kept to a minimum for the affordable housing by avoiding shared communal areas and services (which cannot be cross subsidised as set out in law).
- **Management** The applicant has designed the Proposed Development in consultation with the Council’s partnerships team and Approved Strategic Providers including Origin, One Housing, Peabody and Notting Hill Genesis. This ensures the affordable homes meet the requirements of the Council, housing providers and future occupiers as also set out in CPG2.
- **National Policy:** The NPPF indicates that affordable housing for rent does not need to be managed by a Registered Provider where it forms part of a Build to Rent scheme. For this reason, the CIL regulations permit Intermediate Rent to be owned by providers who may not be Registered Providers.

Distribution & Phasing

3.28 The affordable housing is distributed across the Site to provide a mixed and balanced community. The indicative location of the affordable housing is set out in Table 3.19 below. This will be secured in the S106 agreement.

Table 3.19 – Distribution (Detailed Scheme)

Block	Private Units	Low-Cost Rent	Intermediate	Total Units
N3E	68	0	0	68
N4	46	0	84	130
N5	306	104	0	410
Total	420	104	84	608

3.29 The exact location of the affordable homes in the outline element of the Proposed Development will be determined subject to each reserved matters application.

3.30 The Proposed Development will be phased to ensure that all of the affordable housing is delivered proportionally on a phase-by-phase basis. At the end of each phase the Proposed Development will have provided 35% affordable housing. This will be secured in the S106 legal agreement.

3.31 The distribution and phasing of affordable housing is appropriate having regard to the following factors: -

- **Local Guidance:** The delivery of the affordable homes before all of the market homes accords with the objectives set out in CPG2.
- **Residential Amenity:** The layout of the Proposed Development seeks to optimise residential amenity for all tenures, and avoids concentrating affordable housing close to potential sources of disturbance. This also accords with the requirements of CPG2.
- **Management:** The distribution of homes has been determined in collaboration with the Council’s approved Strategic Registered Providers including Origin, One Housing and Notting Hill Genesis.

Grant Funding

3.32 The provision of 35% Affordable Housing is not contingent on the receipt of grant subsidy (i.e the S106 will not seek to secure a lower quantum where grant is not available). This provides certainty the scheme will provide a minimum of 35% and complies with the requirements of the Threshold Approach (Fast Track) of Policy H5 of the London Plan (2021).

Review Mechanism

3.33 In accordance with Policy H5 (Threshold Approach) of the London Plan (2021) the applicant will commit to an Early-Stage Viability Review. Therefore, if there is a delay in the commencement of development there is the opportunity for the provision of affordable housing to increase subject to future market conditions and delivery timescales. This will be secured in the S106 Legal Agreement.

4 Conclusion

- 4.1 This Statement demonstrates that the amount, type and mix of affordable housing proposed in the planning application is appropriate for the Site and the Proposed Development is in accordance with the statutory Development Plan.
- 4.2 The Affordable Housing proposals comprise 35% Affordable Housing (by floorspace) including 60% Low-Cost Rent and 40% Intermediate (by floorspace). The Low Cost Rented homes will include 52% family sized (3 Bed+) homes in the detailed element (45-50% in the outline element) alongside a smaller mix of intermediate homes.
- 4.3 The provision of 556 new affordable homes (illustrative) equates to c.42% of LBC annual affordable housing target (4.2% of the 10-year affordable housing target). It will therefore make a very important contribution to meeting both local and strategic affordable housing need of which only 22% and 34% of need has been met in the last 32 years respectively.
- 4.4 The Low-Cost Rent homes (315 homes illustratively) will be provided at London Affordable Rents. This will make a significant need to meeting the priority needs of low-income households including vulnerable households (there are presently over 7,000 households on the council's waiting list, ONS 2021). This is a significant benefit noting Build-to-Rent schemes are not required to provide any social rented homes by national or regional policy.
- 4.5 The Intermediate Homes (251 homes illustratively) will be provided as Intermediate Rent, targeting a range of incomes and prioritising those who live and/or work in the borough in accordance with the objectives of the Council's Intermediate Rent Strategy. The intermediate homes will meet the growing needs of 'squeezed middle' households who cannot afford to buy or rent a good quality suitable home in the borough due to pricing pressures but would be very unlikely to be allocated an existing low-cost rent home (e.g key frontline workers).
- 4.6 The applicant has designed the Proposed Development with engagement from the Council's partnerships team and approved Strategic Registered Providers including Origin, One Housing Peabody and Notting Hill Genesis. This ensures the affordable homes meet the requirements of the Council, housing providers and future occupiers as also set out in CPG2.
- 4.7 Whilst the applicant may seek grant, the provision of 35% affordable housing is not contingent on grant. Mechanisms secured in the S106 agreement will enable the amount of affordable housing to be increased further subject to future delivery timescales and viability.
- 4.8 Overall, this Statement demonstrates the affordable housing proposals are appropriate for the Site in accordance with relevant planning policy and other material considerations. The Affordable Housing proposals will make a significant contribution to meeting both local and strategic housing need and must therefore afforded substantive positive decision weight in the overall balance.