



FORMER NESTLE FACTORY, HAYES

AFFORDABLE HOUSING STATEMENT

MAY 2017

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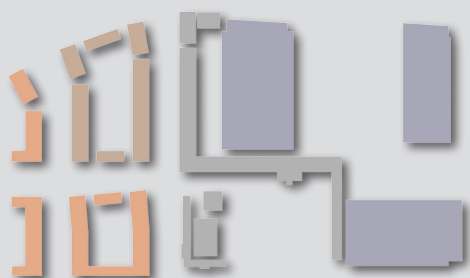
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Gerald Eve LLP is instructed by Barratt London to produce an Affordable Housing Statement ('AHS') in respect of the residential element of the proposed redevelopment for the Former Nestlé Factory Site, Nestles Avenue, Hayes, London.

The AHS is submitted on behalf of both Barratt London and Segro.



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Former Nestle Factory Site, Nestle Avenue, London Borough of Hillingdon

On behalf of BDW Trading Limited (Barratt London)

Affordable Housing Statement

Date: May 2017

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1 Introduction and Instructions

- 1.1 Gerald Eve LLP is instructed by BDW Trading Limited (Barratt London) (“the Applicant”) to produce an Affordable Housing Statement (‘AHS’) in respect of the residential element of the proposed development for the Former Nestle Factory Site, Nestle Avenue, Hayes, London, and (“the Site”).
- 1.2 The AHS is submitted on behalf of the Applicants, Barratt London and Segro.
- 1.3 The remainder of this report is set out as follows:

2) The Proposed Development

3) Local Planning Context: Affordable Housing

4) Housing Context

4) Affordable Housing Proposal

5) Conclusion

2 The Proposed Development

Introduction

- 2.1 A detailed description of the Site and its surroundings is contained within the Planning Application. The planning application is submitted by Barratt London and Segro and this statement sets out information relating to the affordable housing proposal. Whilst this statement is relevant in the context of the comprehensive application, affordable housing will only be delivered in the residential part of the Site.
- 2.2 Further information and details of the scheme are confirmed in the Planning Statement and Design and Access Statement ('DAS'). A summary is therefore provided in the section below,

Location of Site

- 2.3 The site is located at the former Nestlé factory, Nestles, Avenue, Hayes, UB3 4RF, in the southern part of the London Borough of Hillingdon (LBH), west London. It is located approximately 500 metres to the south-east of Hayes Town Centre, bounded to the north by the Great Western Rail Line and Grand Union Canal and to the south by Nestles Avenue. To the west is the existing Squirrels Industrial Estate, accessed from Viveash Close and to the east is North Hyde Gardens, which is a public road. To the north east of the site is Hayes and Harlington Railway Station.

Planning application

- 2.4 The planning application proposes:

"Part-Demolition of existing factory buildings and associated structures, and redevelopment to provide 1,381 dwellings (Use Class C3), office, retail, community and leisure uses (Use Classes A1/A3/A4/B1/B8/D1/D2), 22,663 sqm (GEA) of commercial floor space (Use Classes B1c/B2/B8 and Data Centre (sui generis)), amenity and play space, landscaping, allotments, access, service yards, associated car parking and other engineering works".

- 2.5 Full floorplans for the Scheme can be found in the planning application and details of the design of the proposal in the DAS.

2.6 The Scheme will deliver the following:

- The redevelopment of a redundant, brownfield site in a strategic location that seeks to positively contribute to the wider area and meet the principles of strategic planning policy and Housing Zone aspirations;
- The delivery of 1,381 new homes, a significant proportion of the new homes to be delivered in the designated Housing Zone. A mix of unit sizes are proposed including family dwellings;
- The delivery of affordable housing, which includes 35% provision by habitable room;
- The provision of commercial units, which could provide up to 664 full time equivalent employment opportunities for local people. The commercial units will be high specification and will achieved BREEAM very good;
- The provision of supporting uses to create a sense of community and place, to include a children's day nursery/community facility, a gym, café and small scale office suites;
- A significant amount of publicly accessed open space (over 3 hectares) is proposed, opening up the previously private factory gardens as well as providing children's play space, semi-private courtyards and private amenity areas; and
- The proposed development will also generate a range of financial benefits to public sector bodies including New Homes Bonus, Council Tax generation, Business Rates, Zero Carbon Homes, Community Infrastructure Levy (CIL) and other site specific planning obligations.

Residential

- 2.7 The residential scheme occupies the western part of the site in six blocks of development, with the supporting non-residential uses contained within the former canteen building and the redeveloped parts of the main factory building. The commercial scheme is located at the eastern part of the site, contained within three buildings, which house 4 units

2.8 The scheme proposes a mix of residential units, ranging in size from studio apartments to 3 bedroomed duplexes, although 1 and 2 bedroomed units pre-dominate the scheme. In total 1,381 dwellings are proposed, which represents 3,487 habitable rooms and 139 of the units are wheelchair accessible units,

Table 1: Residential Summary

Unit Type	Number of Units	Percentage of Units %
Studio	111	8
1 Bed	575	42
2 Bed	557	40
3 Bed	138	10
Total	1,381	100

Source: Barton Willmore LLP/ Makower Architects

Affordable Housing

2.9 The masterplan has been designed as tenure blind, therefore at the point of the submission of the planning application, the overall location of affordable housing and tenure provision have not yet been determined.

2.10 It is proposed that the scheme will meet LBH policy by providing 35% affordable housing by habitable room (LBH Planning Obligations SPD), with the proposed tenure split in line with the Mayor's Draft Affordable Housing & Viability SPG (Route B) i.e. 30% low cost rent (London Affordable Rent), 30% intermediate product (shared ownership) and the remaining 40% also intermediate (shared ownership). It is also anticipated that the affordable housing will comprise of 13% 3 bedroomed family dwellings, the majority of which will sit within the London Affordable Rent tenure.

3 Planning Context

Introduction

- 3.1 In this section we provide a brief overview of relevant planning background to the Scheme. A more detailed assessment is contained within the planning statement, which has been submitted to LBH as part of the planning application. This section also provides an overview of key planning policies associated at national, regional and local level including an overview of the planning background relating to the Scheme. Additional reference should be made to the National Planning Policy Framework ('NPPF'), the Planning Practice Guidance ('PPG'), the London Plan, the London Housing SPG, LBH's Local policies.

National Planning Policy Framework ('NPPF')

- 3.2 The NPPF was published in March 2012 and sets out the Government's economic, environmental and social planning policies for England. It summarises in a single document all previous national planning policy advice. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.
- 3.3 In respect of affordable housing, paragraph 50 of the NPPF aims to boost significantly the supply of housing and states that where local planning authorities have identified that affordable housing is needed, they should set policies for meeting this need onsite, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified. Such policies should be sufficiently flexible to take account of changing market conditions over time.
- 3.4 The NPPF also recognises that development should not be subject to such a scale of obligation and policy burdens that its viability is threatened. This reinforces the need for viability testing in order to allow willing landowners and developers to receive competitive returns which in turn enable the delivery of development.

- 3.5 In the context of achieving sustainable development the NPPF refers to ensuring viability and deliverability and states:

*“To ensure viability, the costs of any requirement likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking into account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable”.*¹

Planning Practice Guidance (PPG)

- 3.6 The PPG provides guidance to support the NPPF and to make it more accessible. The statements below are from Section 3 of the PPG Viability Guidance found on the Government’s online planning portal.

- 3.7 With regard to the Council’s consideration of the planning obligations in relation to viability – including the assessment of affordable housing provision, the PPG states:

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

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

Regional Planning Policy

- 3.8 The London Plan, July 2011 with Revised Early Minor Alterations (October 2013) and Further Alterations (March 2015 and March 2016) is the Regional Spatial Strategy for Greater London defined to include the 32 Boroughs and the City of London. The aim of the London Plan is to set out a framework to co-ordinate and integrate economic,

¹ Paras. 173-177 NPPF

² Para. 019. Ref ID: 10-019-20140306

environmental, transport and social considerations over the next 20 to 25 years. The London Plan forms the London-wide policy context within which the Boroughs set their local planning agendas, and forms part of the statutory Development Plan.

3.9 The London Plan builds upon many of the policies set out at the national level with a significant emphasis upon achieving development in the most suitable and sustainable of locations, prioritising the use of previously developed land and making the most efficient use of available land.

3.10 The growth and management of the city form the major challenge and overarching concern of the London Plan, and are prioritised in order to allow London to excel among global cities within the context of significant rates of development and population increases. The detailed objectives of the Plan seek to ensure that London are set out below:

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

3.11 The London Plan establishes the need for regional growth in housing and employment and identifies Opportunity Areas as a means by which this requirement can be accommodated. The London Plan seeks that development should maximise the potential of sites, create or enhance the public realm, provide or enhance a mix of uses, respect local context, character and communities and be sustainable.

3.12 Policy 3.8 states, that whilst boroughs should seek the maximum reasonable amount of Affordable Housing, regard should be had to the need to encourage rather than restrain residential development. Negotiations on sites should take account of their individual circumstances, including development viability.

- 3.13 Policy 3.10 goes on to state that affordable housing including affordable rented and intermediate housing, should be provided to meet the needs of specific households whose needs are not met by the market.
- 3.14 In terms of tenure split, London Plan Policy 3.11 aims for 60% of the provision to be affordable rent and 40% intermediate housing.
- 3.15 Policy 3.12 states that the maximum reasonable amount of affordable housing should be sought when negotiating on mixed use schemes. In particular the policy sets out that regard should be had to the current and future requirements for affordable housing at local and regional levels. Going on to state that there is a need to encourage rather than restrain residential development and promote mixed and balanced communities. The size and type of affordable housing delivered should reflect the size and type of affordable housing currently in need. Part B of Policy 3.12 states that negotiations on sites should take account of their individual circumstances including the viability of schemes and the availability of public subsidy.
- 3.16 The policy also states that targets should be applied flexibly; taking into account, inter alia, site costs, the availability of public subsidy and other scheme requirements.
- 3.17 The Affordable Housing thresholds are set out in Policy 3.13 which states that Boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes.
- 3.18 Paragraph 3.37 of the London Plan reiterates that the Mayor wishes to encourage, not restrain, overall residential development and that Boroughs should take a reasonable and flexible approach to securing affordable housing on a site by site basis.

Mayor's Supplementary Planning Guidance ('SPG')

- 3.19 The current Housing SPG March 2016 has been updated to reflect the Further Alterations to the London Plan ('FALP') and the Minor Alterations to the London Plan ('MALP'). It provides updated guidance on a range of strategic policies including housing supply, residential density, housing standards; build to rent developments, student accommodation and viability appraisals. This SPG replaces the 2012 Housing SPG and the Mayor's Housing Standards Policy Transition Statement.

- 3.20 In November 2016 the Mayor published a revised draft SPG, which has just completed a consultation period. This document demonstrates the direction of travel of the Mayor's policies, highlighting the importance of the planning system delivering more affordable housing. It also seeks to encourage developers to deliver more across London, in particular at least 35% provision on a habitable room basis.
- 3.21 We have considered this in detail and have used it to shape the proposed affordable housing offer, as set out in this statement.
- 3.19 The key theme from the Draft SPG is the GLA emerging flexibility with regards to tenure mix on new developments. Paragraph 2.27 of the document refers to the following flexibility with regard to tenure mix (2.27 GLA SPG):
- *30% low cost rent (social rent or affordable rent) with rent set at levels that the LPA considers genuinely affordable;*
 - *30% as Intermediate products, with London Living Rent and/ or shared ownership being the default tenures assumed in this category;*
 - *The remaining 40% to be determined by the relevant LPA.*
- 3.20 Further discussion on the above tenures and rental levels is set out in Section 4 of this statement.

GLA Housing Zone

- 3.21 The Mayor has selected Hayes Town Centre as one of the 31 Housing Zones, an initiative undertaken in partnership with London boroughs and their development partners as part of the GLA's Housing Strategy. A total of £600 million in funding has been made available by the Mayor and government for the construction of 75,000 new homes. In Hayes, the GLA anticipates a total investment to the value of £1 billion, with £39 million of funding from the GLA. It is anticipated that with the 238 hectares allocated in the housing zone area, 2,788 new homes will be delivered, including 847 affordable dwellings.

3.22 The GLA and LBH have commissioned a Development Infrastructure Funding Study (DIFS) study to be undertaken to understand the requirements for the provision of new physical and social infrastructure within the Housing Zone, which the applicants have contributed to its production through both funding and information sharing.

Local Planning Policy

3.23 At the local level, the Site falls within the administrative area of LBH. The Statutory local planning policy documents and guidance relevant to the provision of affordable housing within the proposed development comprise:

- The Local Plan: Part 1 – Strategic Policies (Adopted November 2012) ('LPP1'), policy H2;
- The Local Plan: Part 2 – Development Management Policies (October 2015) ('LPP2'), policy DMH 7.
- Affordable Housing Supplementary Planning Document (Adopted May 2006)
- Planning Obligations Supplementary planning Document (Adopted from July 2014)

3.24 LPP1 (previously known as the Core Strategy) sets out the long term spatial vision for the borough that all other planning policies should conform to. It was adopted by LBH on the 8 November 2012 and the policies will be used to direct and manage development and regeneration activity for 15 years.

3.25 The emerging LPP2 comprises Development Management Policies, Site Allocations and Designations and Policies Map. Once adopted it will deliver the detail of the strategic policies set out in the LPP1: Strategic Policies (2012). Together they will form a comprehensive development strategy for the borough up to 2026.

Affordable Housing

3.26 LPP1 Strategic Policy SO7 seeks to address housing need in Hillingdon using appropriate planning measures

3.27 In terms of affordable housing policy, LPP1 contains an overall strategic target for affordable homes of 35% by unit, on sites of 10 or more units. However, LBH's planning obligations SPD confirms at paragraph 4.10 that the 35% level of provision

will normally be assessed on the number of habitable rooms rather than the number of units. The policy supporting text also acknowledges that the housing market conditions in Hillingdon are complex and a blanket approach will not be appropriate for all areas in the borough.

- 3.28 Policy H2 envisages that this will be achieved by seeking provision of affordable housing within all residential developments in the borough, with tenure split of 70% social/ affordable rented units and 30% intermediate units. This is also set out in the emerging Development Management Policy DMH 7.
- 3.29 LPP1 Policy H2 states that housing provision is expected to include a range of housing to meet the need of all types of households. The Council will seek to maximise the delivery of affordable housing from all sites. For sites with a capacity of 10 or more units, the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units.
- 3.30 The LPP1 (paragraph 6.32) confirms that for sites with a capacity of 10 or more units the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units. This is extended in paragraph 4.20 of the emerging Development Management Policies which sets out the preference for the following mix across all tenures:
- 7% - one bed accommodation.
 - 70% - two and three bed units,
 - 20-25% ("*more than a fifth*") is for four bed accommodation.
- 3.31 The above unit mix preference is further broken down by tenure in the Development Management Policy document in line with the conclusions from the Council's Housing Market Assessment, as per table 4.1.

Table 2: Councils Guidance on Unit Size Mix

	Unit Sizes				
Tenure	Studio	1 Bed	2 Bed	3 Bed	4 Bed
Social- Affordable Rented		20%	7%	48%	25%
Intermediate		19%	24%	45%	12%

Source: Hillingdon Local Plan (DM policies)

3.32 It should be noted however that this preferred unit mix is not in line with London Plan.

Affordable Housing Supplementary Planning Document/ Planning Obligations Supplementary Planning Document

3.33 LBH also have an Affordable Housing SPD in place which is dated May 2006 and a Planning Obligations SPD dated July 2014.

3.34 This Affordable Housing SPD provides further guidance on the delivery of affordable housing within developments.

3.35 Although we have had regard to this document, given that it is now some eleven years old and pre-dates the adopted Local Plan and London Plan, we have focused on the more recent development plan documents in the formulation of the affordable housing offer for this Site.

3.36 The Planning Obligations SPD also provides further guidance on the delivery of affordable housing. Paragraph 4.10 states (as does LBH’s planning application validation checklist) that the minimum 35% level of provision of affordable housing will normally be assessed on the number of habitable rooms rather than the number of units, where this more appropriately delivers the highest acceptable proportion of affordable housing.

Summary

3.37 We have reviewed national, regional and local policies in relation to the proposed development.

3.38 However, the affordable housing policy agenda is undergoing important change at the London level, with the emergence of GLA policy through the Draft SPG. The SPG seeks to achieve 35% affordable housing by habitable room. It also supports flexibility

within affordable housing offers and tenures and encourages LPAs to adopt this strategy.

- 3.39 Through its Local Plan the LBH policies seeks the maximum provision of affordable housing with a site specific target for affordable housing of 35% by unit although it is Planning Obligations SPD dates 2014 states provision should be assessed by habitable rooms.
- 3.40 In terms of tenure split, LBH seeks developments containing 70% Social-Affordable Rent and 30% Intermediate housing.
- 3.41 In terms of unit mix, an emphasis is placed on larger family sized accommodation for both the Social-Affordable Rent and the Intermediate units.
- 3.42 However it is noted that LBH's unit size preference is not reflected in the conclusions of the Census data analysis from 2011 which shows that 60% of households contain one or two persons and projections envisage that the general trend towards smaller households will continue, particularly amongst elderly persons (see paragraph 4.6 of the emerging Development Management policies).
- 3.43 In summary, the proposals comprise a balanced housing tenure mix which seeks to meet local housing needs and provides an affordable element as an alternative to private market sale dwellings, whilst ensuring the financial viability and deliverability of the development, especially in the context of the other public benefits the scheme will bring, such as the retention of heritage assets and the provision of a significant amount of public open space and the CIL contribution. Given the wider benefits of the scheme and the provision of a significant contribution of new dwellings to meet both the Borough's housing targets and the requirements of the Housing Zone, the proposed affordable housing offer is considered appropriate.

4 Housing Context

Introduction

- 4.1 This section provides a general overview of the wider factors that influence the amount and type of housing to be delivered.

Housing Need and Affordable Housing Supply

- 4.2 The London Plan (2016) sets a target for Hillingdon to provide 425 new dwellings per annum. In accordance with Government guidance, this target has been rolled forward to cover the Hillingdon Local Plan: Part 1- Strategic Policies period up to 2026. The London Plan (2016) contains a revised target for Hillingdon to provide 4,250 dwellings up to 2021, based on the Mayor's Strategic Housing Land Availability Assessment (SHLAA).
- 4.3 The latest GLA Annual Monitoring Report (2014-15) shows that in Hillingdon 577 net dwellings were completed between 2012-2015. As a percentage of net conventional supply, this represented approximately 26% affordable housing in 2012/13, 15% in 2013-14 and 8% in 2014-15. (GLA Annual Monitoring Report 2014-15).

Affordability of Housing

- 4.4 According to the LBH Local Plan, approximately 33% of households in the borough are unable to afford market housing. (Local Plan Part 1, Page 11).
- 4.5 Entry-level purchase prices in Hillingdon range from £150,500 for a one bedroom property and £376,000 for a four bedroom property. Private rental costs at the entry level range from £165 per week for one bedroom accommodation and £419 per week for a four bedroom property.
- 4.6 The analysis of housing market gaps suggests that entry-level market housing is more than double the cost of social rented accommodation, indicating that intermediate housing would be very beneficial to a number of households in ascending the housing ladder. (Strategic Housing Market Assessment, 2017).

Housing Tenures

Social-Affordable Rented Housing

4.7 A flexible affordable housing offer to provide 30% Social/Affordable Rented accommodation has been proposed for this scheme.

4.8 The Council considers Social and Affordable Rented housing as one type of provision and refers to it as '*Social/Affordable rented housing*' in emerging Policy DMH7. Both definitions have therefore been considered below.

4.9 Social Rented housing is defined as:

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

4.10 Affordable Rented housing is defined as:

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

4.11 It is proposed that the Social-Affordable Rented units provided in this development will be set in line with London Affordable Rents.

Intermediate Housing

4.12 Intermediate Housing is defined as:

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

- 4.13 An affordable housing offer including 70% Intermediate accommodation has been put forward in the proposals for this scheme.
- 4.14 Intermediate Housing can include a number of different types of products, set out as follows:
- Rented housing including Discounted Market Rents and London Living Rents;
 - Shared Ownership housing (where occupiers buy a share and rent the remainder);
 - Shared Equity housing;
 - Homes for sale at less than market price.
- 4.15 Shared Ownership is the intermediate housing product proposed within development.
- 4.16 A review of LBH's affordable housing policy demonstrates that the borough does not have its own Affordability Thresholds for Intermediate housing. The offer will therefore apply the GLA's income thresholds, which requires that all Shared Ownership 1, 2 and 3 bed units are affordable to maximum household incomes of £90,000 per annum (GLA Household Income Estimates).

Summary

- 4.17 It is evident that recent housing completions are considerably lower than the London Plan target demonstrating the need to maximise affordable housing in the borough. Accordingly the proposed development will provide 35% affordable housing in line with the Mayor's draft SPG and the LBH's SPD.
- 4.18 Affordability is a key issue for housing in Hillingdon and it is essential that the affordable housing offer proposed ensures this is considered.

5 Affordable Housing Proposal

Introduction

- 5.1 In this section of the report the proposed affordable housing is set out.
- 5.2 The Applicant consulted with the GLA on a more flexible approach to the affordable housing offer on this Site which was supported, together with the proposed unit mix.
- 5.3 The level of affordable housing is therefore being maximised at 35% of habitable rooms, in line with the GLA's draft SPG and the LBH's SPD.
- 5.4 The GLA's draft SPG, paragraph 2.27, proposes a preferred tenure split as follows:
- *30% low cost rent (social rent or affordable rent) with rent set at levels that the LPA considers genuinely affordable;*
 - *30% as Intermediate products, with London Living Rent and/ or shared ownership being the default tenures assumed in this category;*
 - *The remaining 40% to be determined by the relevant LPA.*
- 5.5 On this basis, it is proposed that 30% of the affordable units will be offered as a rented product, with rent levels to be discussed with the LBH;
- 5.6 The remaining 70% of the units is offered as Intermediate.
- 5.7 This proposal comprises the maximum amount of affordable housing that can be delivered on the site.
- 5.8 As the development is providing 35% affordable housing by habitable rooms, the Applicant is not required to submit a Financial Viability Assessment to accompany the Scheme. This is confirmed by LBH's local list setting out validation requirements.
- 5.9 The affordable housing proposal represents a provision of 35% of all the residential habitable rooms in the development, with a flexible tenure split of 30% London

Affordable Rented and 70% Intermediate Housing (Shared Ownership).

- 5.10 The affordable housing proposal is in line with the GLA policy. Although it is recognised that the local Development Management policy is to assess affordable housing by unit numbers and not habitable rooms, the Applicant welcomes further discussions with the borough to agree the overall affordable housing position.
- 5.11 The outcome of the detailed discussions with the LBH and the GLA will determine the overall planning offer taking account of borough and Mayoral CIL, the affordable housing contribution and other S106 site specific planning obligations that the development can support whilst ensuring delivery in accordance with the NPPF.
- 5.12 The masterplan has been designed as tenure blind at the point of the submission of the planning application, so therefore the overall location of affordable housing provision has not yet been determined. Therefore all units have been designed to the same standard and levels of amenity provision

6 Conclusion

- 6.1 Affordable housing is a key element in the proposed delivery of the Scheme.
- 6.2 This Scheme proposes an on-site affordable housing provision of 35% by habitable rooms.
- 6.3 The tenure provision within this represents a split of 30:70 (Rented: Shared Ownership).
- 6.4 It is proposed that the scheme will meet emerging GLA policy and LBH policy as stated in the Planning Obligations SPD; however, there is some ambiguity on whether the Council's accepted provision of affordable housing is by habitable room or by unit. The offer made by the applicants is to provide 35% affordable housing by habitable room, with the proposed tenure split in line with the Mayor's Draft Affordable Housing & Viability SPG (Route B) i.e. 30% low cost rent (London Affordable Rent), 30% intermediate product (shared ownership) and the remaining 40% also intermediate (shared ownership). It is also anticipated that 13% of 3 bedroomed family dwellings will be affordable, the majority of which will sit within the London Affordable Rent tenure.
- 6.5 The Applicant welcomes the opportunity for future discussions with the LBH's Housing and Planning Departments and the GLA, to agree the affordable housing provision.

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