

14 April 2026

AFFORDABLE HOUSING PROPOSED CONVERSION TO DISCOUNTED MARKET RENT

1. Town Centre West, Uxbridge

- 1.1.** Town Centre West forms part of the Outline Planning Permission (Ref: 585/APP/2009/2752) for the St Andrews Park development in Uxbridge. The reserved matters approval for Town Centre West (Ref: 585/APP/2016/4504) was granted in March 2022 and was subsequently implemented however, construction was halted in late-2023 and the development has remained in its current unfinished state since then.
- 1.2.** The current state presents a number of issues making the transfer of the affordable block to a Registered Provider extremely challenging. At present, the development cannot proceed without the change in affordable housing tenure.
- 1.3.** In order to unlock the stalled site and enable completion of the development, the Applicant is proposing a revised affordable housing offer within Block 3 comprising:
 - Conversion of the 56 consented affordable units (30 Affordable Rent and 26 Shared Ownership) to Discounted Market Rent (DMR); and
 - Provision of one additional affordable unit within the approved built envelope.
- 1.4** This would result in a total of 57 affordable homes within Block 3 and therefore represents an affordable housing offer that is at least equivalent to, and modestly greater than, the consented scheme in quantitative terms. In practical terms, the cost to residents would be no more than the consented Affordable Rent levels and likely lower than the overall cost associated with the Shared Ownership homes in the consented scheme.
- 1.5** The consented 56 affordable units currently deliver 143 habitable rooms. The addition of a further 2B4P unit would increase provision to 146 habitable rooms, representing a modest uplift in affordable quantum within the approved envelope. The proposal therefore maintains the approved affordable housing provision and delivers a small enhancement in overall affordable capacity.
- 1.6** The additional unit would be accommodated without any increase in building height, footprint or material change to the approved massing strategy. There would be no material change to the approved built form, layout or external appearance of the development.



2 Tenure Approach and Policy Context

- 2.1** The revised proposal would deliver all 57 affordable homes as Discounted Market Rent, secured in perpetuity through the Section 106 Agreement. The proposed approach is intended to maintain an affordable housing offer that is at least equivalent to the consented provision in practical terms, whilst enabling delivery through a single professionally managed rental product.
- 2.2** Whilst the scheme is not being re-consented as a formal Build to Rent development, the proposed DMR product would follow the relevant principles set out in London Plan Policy H1 1, including:
- Unified management of the rented homes within Block 3
 - Longer tenancy options for residents
 - Rent certainty over the tenancy term
 - Formula-linked annual rent reviews
 - No up-front tenant fees beyond rent in advance and tenancy deposit
- 2.3** Policy H1 1 recognises DMR as an appropriate affordable housing product where it is secured in perpetuity and remains genuinely affordable. In this case, the proposed approach would maintain affordability, simplify tenure and block management, and support delivery of the affordable homes in circumstances where disposal to a Registered Provider has not proved deliverable. The proposal therefore provides a practical mechanism to secure the approved affordable housing outcome within the extant consent.

3 Rent Levels and Affordability

- 3.1** The proposed DMR homes would be secured as intermediate housing and allocated in accordance with the Mayor's intermediate housing eligibility criteria, with priority given through Locata Hillingdon and appropriate cascade provisions to be secured through the Section 106 Agreement. This would ensure that the homes remain available to income-eligible households with a local connection in a manner comparable to the consented affordable housing offer.
- 3.2** Rents would be structured to ensure that all homes remain affordable to households within the Mayor's current £75,000 gross household income threshold for intermediate rented housing, or any future revisions to that threshold introduced by the GLA. The proposed rent cap of £1,750 per calendar month provides a clear upper limit across all unit types, ensuring continued accessibility to income-eligible households while maintaining a viable and deliverable rental model. In practical terms, this ensures that the proposed homes would remain affordable to a target cohort that is at least equivalent to that served by the consented Affordable Rent and Shared Ownership offer.
- 3.3** Annual rent reviews would be formula-linked, anticipated at CPI + 1%, in order to provide transparency and certainty to residents at the outset of the tenancy and to ensure that affordability is maintained in real terms over time. The review structure would be clearly set out within tenancy agreements and secured through a variation to the Section 106 Agreement.



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4 Delivery context and Registered Provider demand

- 4.1** The consented affordable housing offer was secured through a Section 106 Agreement negotiated several years ago and reflects the tenure structures and delivery assumptions that were common at that time, in particular the expectation that the affordable homes would be disposed of to a Registered Provider.
- 4.2** Since the consent was granted, the operating environment for Registered Providers has changed materially.
- 4.3** Across London there is now a significant pipeline of Section 106 affordable housing coming forward alongside substantial financial pressures on Registered Providers, including building safety remediation, decarbonisation programmes and regulatory requirements. As a result, many providers have prioritised delivery within their own development programmes and reduced their appetite for acquiring Section 106 homes from third-party developers.
- 4.4** In addition, the affordable homes within this scheme would be acquired within a partially constructed development, to older Building Design Standards, which further limits Registered Provider interest due to programme risk and the limited ability to influence design, specification or procurement.
- 4.5** The consented tenure mix also reflects earlier affordable housing products, which are now less closely aligned with the operational models currently being pursued by many Registered Providers and institutional rental operators.
- 4.6** Taken together, these factors create a material risk that the affordable homes could not be delivered through the originally anticipated Registered Provider acquisition route.
- 4.7** The proposed Discounted Market Rent approach therefore provides a pragmatic and deliverable mechanism to ensure that the affordable homes are completed and retained as affordable housing, while maintaining an affordability outcome that is at least equivalent to the consented scheme, and in the case of Shared Ownership, making the homes more accessible.

5 Deliverability of the proposed approach

- 5.1** The proposed Discounted Market Rent model provides a pragmatic mechanism to ensure that the affordable homes are delivered and retained as affordable housing.
- 5.2** Under this approach:
- all 57 homes would be secured as discounted rental housing in perpetuity through the Section 106 Agreement
 - rents would be capped at Affordable Rent levels (up to 80% of market rent)
 - eligibility and allocation would be controlled through GLA intermediate housing criteria and Locata Hillingdon
- 5.3** The proposal therefore enables the delivery of affordable homes within the extant consent, rather than relying on a disposal route which current market conditions indicate is unlikely to occur.



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5.4 In this context, the revised tenure approach provides a realistic and deliverable route to securing affordable housing on the site, while maintaining an affordability outcome that is at least equivalent to the consented scheme. The proposed approach would also ensure the affordable homes could accommodate the same households that would be eligible to occupy the affordable homes in the consented arrangement.

6 Comparison to the Consented Scheme

	Consented Scheme	Proposed Scheme
	Affordable Rent	Discounted Market Rent (capped at Affordable Rent levels)
Quantum	30	30
Rent Levels	Up to 80% of market rent	Up to 80% of market rent
Equivalent Household Income	Eligible for Affordable Rent	£75,000 income cap
	Shared Ownership	Discounted Market Rent (GLA income caps)
Quantum	27	27
Household Income	£90,000	£75,000
Total Affordable Homes	56	57
Habitable Rooms	143	146
Eligibility	Eligible for affordable housing	GLA intermediate housing eligibility
Allocation	Not specified in S106	Locata Hillingdon priority allocation with borough cascade
Affordability Period	Secured through S106	Secured through S106 in perpetuity
Annual Rent Reviews	Not specified	Formula-linked rent reviews (anticipated CPI + 1%)
Tenure Type	Affordable Rent / Shared Ownership	Discounted Market Rent (long-term rental)
Planning Outcome	56 affordable homes delivered	57 affordable homes delivered

7 Summary and Planning Strategy

7.1 The proposal:

- Secures DMR in perpetuity
- Increases affordable habitable rooms within the approved envelope
- Simplifies tenure and block management
- Maintains compliance with approved design and amenity standards
- Ensures affordability through adherence to the GLA intermediate housing income threshold
- Maintains an affordable housing offer that is at least equivalent to the consented scheme
- Secures local allocation and affordability controls through the Section 106 Agreement



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- 7.2** The Applicant considers this proposal to be policy-compliant, deliverable and capable of being secured through a targeted variation to the Section 106 Agreement, while maintaining an affordable housing outcome that is at least equivalent to the extant consent.
- 7.3** Recent national policy guidance also recognises the structural challenges currently affecting the Section 106 market. The Government’s policy statement “A Roadmap for Section 106 Delivery in England” highlights that declining demand from Registered Providers has resulted in a significant number of consented or constructed Section 106 homes remaining uncontracted across the country, with the consequence that development sites are being delayed or stalled. The statement acknowledges that a complex range of factors has contributed to this position and that many Section 106 units currently have no realistic prospect of securing an RP purchaser in the short term.
- 7.4** The Roadmap therefore encourages Local Planning Authorities to take a pragmatic approach where developers can demonstrate that reasonable endeavours have been made to secure an RP buyer but this has not proved possible, including through the renegotiation of Section 106 obligations and variation of tenure where necessary to unlock delivery. In this instance, the proposed conversion to Discounted Market Rent provides a practical mechanism to ensure that the affordable homes can be delivered and occupied, rather than remaining uncontracted and preventing completion of the wider development.
- 7.5** The Government’s Roadmap also envisages circumstances in which Section 106 obligations may need to be formally renegotiated where reasonable endeavours to secure a Registered Provider purchaser have been unsuccessful. While the Applicant considers that such routes could ultimately be pursued if required, the intention in bringing forward the present proposal is to work proactively with the Council to agree a pragmatic solution at this stage which secures the delivery of the affordable homes within the extant consent and avoids unnecessary delay to the completion of the development.