Housing Evidence Statement

1.0 Introduction

1.1 This technical paper provides background evidence to support the policies set out in OPDC's Regulation 19 Local Plan. It has been informed by the following studies and evidence:

- emerging Mayor of London's policy;
- the direction of travel in the recent Government's White Paper;
- OPDC's Strategic Housing Market Assessment (SHMA), which identifies the need for different housing typologies and affordabilities;
- OPDC's Development Capacity Study;
- OPDC's Absorption Rate Study; and
- OPDC's Affordable Housing Viability Assessment (AHVA).

2.0 Context

2.1 The Old Oak and Park Royal Opportunity Areas (set out in the Mayor's London Plan, 2016) cover a total of 650 hectares. Today the area is predominantly Strategic Industrial Location (SIL) with over 1,700 existing businesses, and some small established residential communities of approximately 7,000 people comprising 2,800 households.

2.2 The OPDC area is set to be transformed over the next 20 to 30 years. This regeneration will be catalysed by the opening of the new Old Oak Common Station in 2026, which will connect the Elizabeth Line and National Rail services to the newly built High Speed 2 (HS2) line in a station accommodating over 250,000 passengers a day. Centred on this new transport super-hub, the OPDC area constitutes one of the UK's and London's largest regeneration project, identified in the London Plan as being capable of delivering a minimum 25,500 new homes and 65,000 jobs.

2.3 OPDC's Local Plan sets out the policies that will guide the transformation of Old Oak from predominantly an area based around industrial and transport uses to a new commercial hub and new major town centre, with a network of new high density residential neighbourhoods and to the west mixed-use areas, and a protected, strengthened and intensified Park Royal industrial estate.

2.4 The primary development site is Old Oak, comprising approximately 135 hectares. The regeneration of Old Oak is identified in the London Plan as having the capacity to accommodate over 24,000 new homes and will result in a future residential population of approximately 60,000 new residents and approximately 55,000 new jobs on a brownfield site in zones 2/3 West London. Within Park Royal there is the capacity to accommodate over 1,500 new homes and 10,000 jobs.

2.5 The challenges in delivering this are significant, including:

- The long-term transformation of Old Oak is anticipated to take 20 to 30 years. New homes and communities will start to emerge in advance of the major transport investment and other place making improvements. It will be important to ensure that there is enough physical and social infrastructure in place to support early development and these new communities;

- The Old Oak area in particular requires a range of new and improved infrastructure (e.g.: bridges and roads) to ensure this new part of London is connected into its surroundings and can function as a new place;
- There are multiple landowners across both the public and private sectors and the phasing and complementary delivery of this land will need to be coordinated;
- Funding and financing new infrastructure will be challenging in particular when considered alongside the delivery of the Mayor's requirements for affordable homes and to achieve this additional public-sector funding and/or financing support will likely be needed.

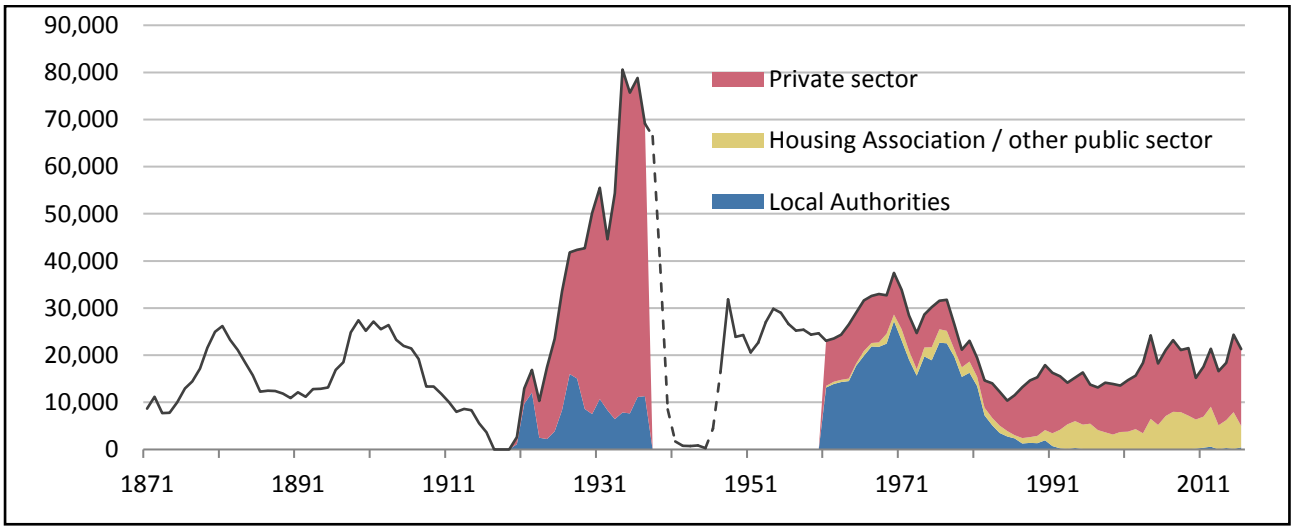
3.0 Emerging Mayoral housing policy

3.1 The Mayor of London is committed to a long-term strategic aim to maximise the delivery of affordable housing and ensure that half of all new homes in London are genuinely affordable to the people who want and/or need to live in the capital. This is set in a context of recognising that the private sector on its own will unlikely be able to deliver this and as such, the Mayor intends to support this goal by investing more in affordable housing, bringing forward more public-sector land for development, and by increasing the amount of affordable housing delivered through the planning system. OPDC is working with the GLA to align its housing policies and how OPDC will work with the Mayor's new "Homes for Londoners" team.

3.2 The Mayor's draft new London Plan was published in December 2017 and is planned to be adopted in 2019 and includes the policies in the Affordable Housing and Viability SPG which came into force in Autumn 2017. OPDC officers have worked closely with the GLA to determine how best to apply the Mayor's current affordable housing policies at Old Oak and Park Royal to ensure that they are in general conformity with the principles contained in the Affordable Housing and Viability SPG and the draft new London Plan. Further details on Mayoral housing policy are contained in Appendix 1.

3.3 The Mayor's policies are set within the context that there is an acute shortage of housing in London. The number of homes built in London in 2015 was the highest in a calendar year since 1978. However, in general recent supply has been low in historical terms: over the last decade an average of 20,030 homes have been built each year, compared to an average of 61,460 in the 1930s and 29,420 in the 1970s (see Chart 1).

Chart 1- New homes built in London 1871 to 2015



3.4 Chart 1 also shows that the level of public sector housebuilding is historically low. Encouraging more public sector investment in housebuilding by local authorities, Registered Providers and other public-sector bodies can help to increase the overall supply of homes built.

3.5 The draft new London Plan 2017 sets the threshold level of affordable housing at:

- A minimum of 35%;
- 50% on public sector land;
- 50% for Strategic Industrial Location, Locally Significant Industrial Sites and other industrial sites deemed appropriate to release for other uses.

3.6 The Mayor recognises that Opportunity Areas such as Old Oak and Park Royal along with Housing Zones are key sources of new housing supply in London. They are by their very nature complex to bring forward and often require significant upfront investment infrastructure.

4.0 Emerging Government housing policy

4.1 The Government has released a Housing White Paper called "Fixing the Broken Housing Market" with a series of proposals to boost housing supply and create a more efficient market where outcomes more closely match the needs and aspirations of all households and which supports wider economic prosperity.

4.2 The White Paper has four themes. The first theme is "Planning for the right homes in the right places". This aims to ensure that all areas have robust and transparent local plans in place and that they are reviewed at least every 5 years. The second theme, "Building homes faster", includes proposals to speed up the planning process. The third theme, "Diversifying the market", includes proposals to assist councils and Small and Medium Enterprise builders and modernise housebuilding methods. The final theme, "Helping people now", includes proposals to help people into home ownership through Help to Buy, Starter Homes and Right to Buy and greater protection for people renting in the private rented sector.

4.3 In the Revised Draft National Planning Policy Framework published in March 2018 the Government is proposing introducing a new standardised approach for assessing housing requirements called Local Housing Needs. Mayoral Development Corporations that cross local authority boundaries will be able to adopt a bespoke approach to assessing housing requirements. The Government has proposed transitional arrangements whereby the existing Framework is applied to the examining of plans until 6 months after the publication of the final revised framework, expected to be in Autumn 2018. As a Mayoral Development Corporation, OPDC can set a bespoke methodology that reflects the fact that housing delivery can meet local housing needs and strategic London housing needs. The approach makes use of population projections and market signals as set out in current guidance.

4.4 The Government has abandoned the mandatory requirement for Starter Homes on all new sites as set out in the Housing and Planning Act 2016. Rather, the Government intends to amend the NPPF to introduce a policy expectation that housing sites deliver a minimum of 10% affordable home ownership units. The proposed approach is flexible and may include a range of affordable home ownership products, including: Starter Homes, Shared Ownership and other forms of discount market sale homes aimed at

households who would otherwise struggle to purchase standard market homes. The Mayor's Affordable Housing and Viability SPG and draft new London Plan states that at least 30% of new homes should be Intermediate housing and this could include affordable home ownership units and, therefore, meet the Government's policy expectation.

4.5 The Government intends to make clear through the revised NPPF that Starter Homes, like Shared Ownership homes, should be available to the households that need them the most, with an income of less than £90,000 in London (£80,000 elsewhere). Eligible first-time buyers will also be required to have a mortgage in order to buy Starter Homes to stop cash buyers benefitting from this scheme.

5.0 OPDC housing capacity and projected housing target

5.1 OPDC has produced a Development Capacity Study (DCS) for the area, which has assessed the capacity for new homes and a trajectory for their potential phased delivery (based on a site by site assessment), as set out in Table 1 below.

5.2 To further inform this proposed trajectory, OPDC also produced an Absorption Rate Study which assesses typical delivery rates across London over recent years, including delivery rates in other large regeneration schemes. Given the scale of the site, the research concludes that there are multiple housing markets within Old Oak and Park Royal and therefore an average delivery rate of up to 700 private sale homes a year could be achieved. On top of this, private rented sector homes and affordable homes could also be delivered and absorbed into the market giving an estimated total number of homes annually of up to 1,400.

5.3 For the period of the Local Plan (2018 to 2038), OPDC's DCS is showing that approximately 20,100 homes can be delivered. Therefore, OPDC is promoting an annual housing target of 1,005 which is the total delivery figure set out in the DCS divided by 20 years. This figure recognises that in some years housing delivery, including the amount of affordable housing, may be greater than this and in other years may be lower. Year on year variation in housing delivery is likely for various economic and political reasons. The current development trajectory and associated annual target is based on the level of information available at the time of production. As OPDC and landowners develop a greater level of understanding about the development potential and timed delivery of these sites these projected figures are likely to change over time.

Table 1- OPDC phasing plan starting in 2018 (rounded)

0 to 5 years	6 to 10 years	11 to 20 years	21 years +	Total
4,000	7,000	9,100	6,400	26,900
Local Plan 2018 to 2038 (20 years)		20,172		

5.4 For the first 5 years there is some certainty about sites coming forward for development and along with windfall sites, OPDC should be able to work to an annual monitoring target of 1,005 homes. In the medium/longer-term, regeneration of Old Oak and Park Royal is more complex. OPDC will have to work with the landowners and key stakeholders, including the Department for Transport and Network Rail, to agree the steps required to unlock sites such as the Crossrail depot and sidings for development. The outcome of these discussions could impact on the phasing plan and delivery targets shown above.

6.0 OPDC overall housing need (SHMA)

6.1 London's need for housing is identified through the GLA's Strategic Housing Market Assessment (SHMA) 2017 which draws on existing government guidance to identify London's need for both market and affordable housing. On this basis, London needs 66,000 additional homes per year from 2016 to 2041. This is an increase from the 2013 GLA SHMA which projected a need for 976,000 homes between 2016 and 2036.

6.2 OPDC also produced a SHMA, which establishes objectively assessed housing need. Determining the SHMA area for Old Oak and Park Royal is unique as the area is only 650 hectares of land and crosses three London borough boundaries.

6.3 Initially, the SHMA considered the objectively assessed housing need on the land within the Old Oak and Park Royal red line boundary as would usually be the case for a local authority in identifying its housing market area for determining housing need in accordance with the NPPF. However, based on this approach the area's current population is 7,000 people and 2,800 households and the SHMA would only identify a need for 1,200 new homes over the Local Plan period (2018 to 2038).

6.4 Clearly, given the strategic importance of development envisaged for this area, it is not considered appropriate to assess housing need within the OPDC red line boundary alone. Therefore, the SHMA and housing market area has been extended to include the combined area of the London Boroughs of Brent, Ealing and Hammersmith & Fulham. Based on this revised SHMA area the need is for 99,000 new homes over the Local Plan period (2018 to 2038), as shown in Table 2 below.

Table 2- Housing need in OPDC housing market area and London over 20 year period of Local Plan

	Affordable		Market		Total
OPDC	44,400	45%	54,600	55%	99,000
GLA[1]	845,000	65%	464,000	35%	1,300,000

6.5 Projecting forward, the total need identified across the whole of the OPDC SHMA area (99,000) is likely to be met by a combination of the delivery capacity of 26,900 homes identified in OPDC's phasing plan plus the London Boroughs of Brent, Ealing and Hammersmith & Fulham meeting their respective London Plan (2016) housing monitoring delivery targets over the next 20 years (Table 3 below).

Table 3- meeting the need identified in the SHMA

	Number of homes
OPDC phasing plan	26,900
Brent annual monitoring target x 20	30,500
Ealing annual monitoring target x 20	25,940
Hammersmith & Fulham annual monitoring target x 20	20,620
TOTAL	103,960

6.6 OPDC is a Mayoral Development Corporation and can help to increase London's overall housing supply and help the Mayor of London to meet his affordable housing aspirations. As has been set out in section 3, the Mayor expects Opportunity areas such

[1] Approximated by multiplying the annual housing need figure in the 2017 GLA SHMA by 20 years

as Old Oak and Park Royal to significantly increase the supply of homes and particularly affordable homes. As well as providing homes to meet the market and affordable housing need in the three host boroughs as identified in OPDC's SHMA, the area is also capable of providing homes to meet wider strategic, London-wide housing need.

7.0 SHMA conclusions on affordable tenure mix

7.1 There are 44,400 households within the OPDC SHMA housing market area (this equates to 45% of total households) who cannot afford market housing. Of these households 86% can afford London Affordable Rent (equivalent to social rent) and 14% can afford Intermediate housing tenures (of which 7% can afford London Living Rent and 7% can afford Shared Ownership)[2]. These results (table 4) are reflective of the high cost of housing in the area, both in terms of renting and buying a home, rather than an assessment of whether individual households would qualify for any particular type of housing. For example, in the case of London Affordable Rent allocation and nomination would be dependent on a household having a "reasonable preference"[3] on a local authority housing allocations scheme, in accordance with the Housing Act 1996 and homelessness legislation. The SHMA also finds that 18% of the households identified who can afford London Affordable Rent without housing benefit could potentially afford London Living Rent if they spend more than 1/3 of gross income on rent or with some housing benefit support.

Table 4: Affordability of different tenures assuming 1/3 of gross income is spent on housing costs

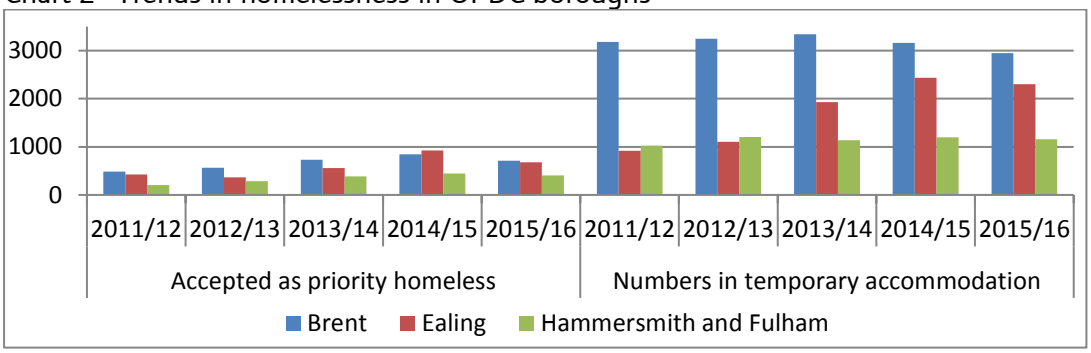
London Affordable Rent (LAR)		Intermediate housing	
Can afford LAR (with housing benefit only)	Can afford LAR	Can afford London Living Rent	Can afford 80% market rent/ Shared Ownership
68%	18%	7%	7%

7.2 Chart 2 below provides some context for acute housing need in the area over the past 5 years in the three host OPDC boroughs. During 2015/16 there were 7,000 households living in temporary accommodation and 2,000 households were accepted as homeless. Brent has the highest number of households in temporary accommodation although the number has declined between 2013/14 and 2015/16 due to increased use of powers to discharge housing duty into the private rented sector. The numbers of households accepted as homeless has fluctuated over the period but Brent and Ealing have accepted more households than Hammersmith & Fulham. However, this does depend on the allocation policies of the respective boroughs and these policies change over time. End of assured shorthold tenancy (i.e. end of tenancy in the private rented sector) has become the principal reason why households become homeless in London, reflecting the fact that it is often unaffordable to rent privately.

[2] This is assuming that households can spend 1/3 gross income on rent

[3] Section 167(2) of the Housing Act 1996 requires that local housing authorities give priority to people in five groups: people who are homeless, people who are owed a housing duty, people occupying unsanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions, people who need to move on medical or welfare grounds (including disability, and people who need to move where failure would do so would case hardship

Chart 2- Trends in homelessness in OPDC boroughs



.7.3 As a Mayoral Development Corporation, OPDC has also considered how it can help meet wider London need as well as locally arising needs shown in table 4. In the GLA's 2017 SHMA there is an annual need for approximately 43,500 affordable homes, which accounts for 65% of the total housing need[4].

7.4 Delivering homes at London Affordable Rent (LAR) levels will enable OPDC to help the local authorities to meet acute housing needs. However, the Mayor of London sets out his housing ambition in the Affordable Housing & Viability SPG and draft new London Plan that Opportunity Areas should seek to significantly increase the supply of affordable homes in London and, to that end, achieve more than 35% affordable housing[5] on sites, subject to development viability. In order to be in general conformity with the Mayor's ambition that half of new homes are affordable and taking into account the viability evidence discussed in section 9 below, other affordable housing tenures are required as well as LAR to get beyond the 35% affordable housing threshold. This will enable OPDC to maximise the overall percentage of affordable homes that can be delivered and therefore create a sustainable mixed new community at Old Oak and Park Royal that can meet a range of housing needs across different income groups.

7.5 The GLA has calculated the estimated income distribution of households that have recently moved in London by affordable housing tenure. This research[6] found that:

- Households moving into social housing have by far the lowest incomes, with half on less than £11,500 a year. The Mayor has been clear that rents set at 80% of average market rents are not affordable for households who are eligible for social housing;
- The private rented sector accommodates the most diverse income range, with half on less than £30,000 but 21% on more than £50,000;
- The range of incomes accessing shared ownership is also wide with a median income of £40,000 which is less than the £58,000 median income of households purchasing on the open market.

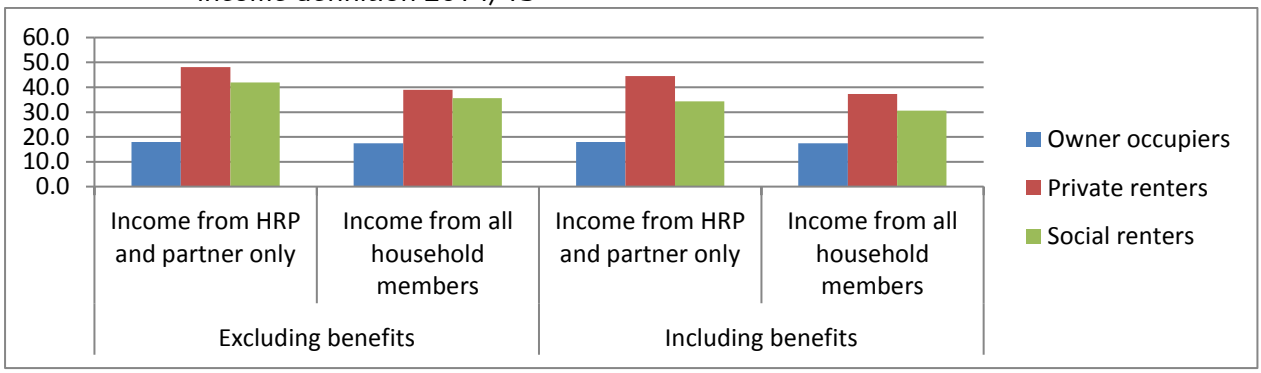
This demonstrates the wide range of incomes for households in need of housing in London and the need for development at Old Oak and Park Royal to offer a range of housing types to meet different needs and a range of household incomes.

7.6 Data from the English Housing Survey identifies that the burden of housing costs in London is highest for renting households, though it is alleviated by benefits and,

[4] This includes households who are currently living in the private rented sector who have set out in the English Household Survey that they would like to purchase their own home but currently cannot afford to.
[5] Measured by habitable room in accordance with the threshold approach
[6] Housing in London 2017, GLA

particularly in the private rented sector, multiple adults sharing a home (Chart 3). Looking only at the income of the household reference person (HRP) and their partner and excluding benefits, the typical private renter in London spends 48% of their income on all housing costs, compared to 42% for social tenants and 18% for owner occupiers with mortgages. However, many households who rent privately include more than two incomes, and taking the income of all household members into account brings the median cost burden for private renters down to 39%, while taking benefits into account lowers it again to 37%. By this last definition, the typical cost burden is 17% for owners and 31% for social renters.

Chart 3- Housing costs as a share of gross household income in London by tenure and income definition 2014/15



7.7 The Mayor has proposed a new intermediate rent tenure called the London Living Rent (LLR). This is set out in the Affordable Housing and Viability SPG and draft new London Plan as one of the Mayor's preferred affordable tenures. LLR is based on rents that are no more than one third of medium gross local household incomes and targeted at middle-income households in London's private rented sector who are looking to save money on their rent and build up savings for future shared ownership or outright purchase. The GLA has published maximum rents by number of bedrooms for new LLR homes (inclusive of service charges) in every ward in London. The rent levels are derived from average gross local incomes and ward-level house prices and will be updated on an annual basis. A step by step guide on how to set LLR rents is contained in Appendix 2.

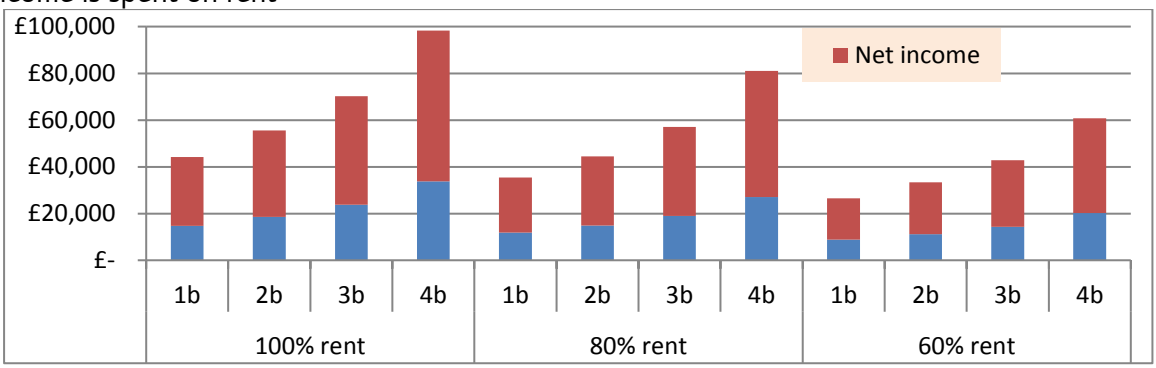
7.8 Annualised median gross household income for London is calculated from "Households Below Average Income" (HBAI) data. Using the latest available data (currently the 2014/15 dataset), this gives a figure of £35,618. To estimate median household income for individual local authorities, this London-wide figure is re-scaled at borough level using data from the Annual Survey of Hours and Earnings (ASHE), specifically the average of the last three years of annual gross pay. The median incomes to be used for the OPDC local authorities are shown in Table 5 below. These figures will be updated by the GLA on an annual basis using the latest available data.

Table 5- London Living Rent medium income benchmarks

Borough	Median household income
Brent	£31,205
Ealing	£33,519
Hammersmith & Fulham	£42,290
Average of 3 boroughs	£35,671

7.9 Using the average private rents across[7] the three OPDC boroughs and the London Living Rent 1/3 of gross household income principle, Chart 4 below shows how different rent levels compare and how affordable they are. To be able to afford a 100% market rent a household will have to earn £45,000 to rent a 1 bed, rising to nearly £100,000 to rent a 4 bed when limiting the rent to 1/3 of household income. To be able to afford 60% private rent (approximately equivalent to London Living Rent) then a household would need to earn £28,000 to rent a 1 bed property and £60,000 to rent a 4 bed property.

Chart 4- Household incomes required to afford different private sector rents where 1/3 income is spent on rent

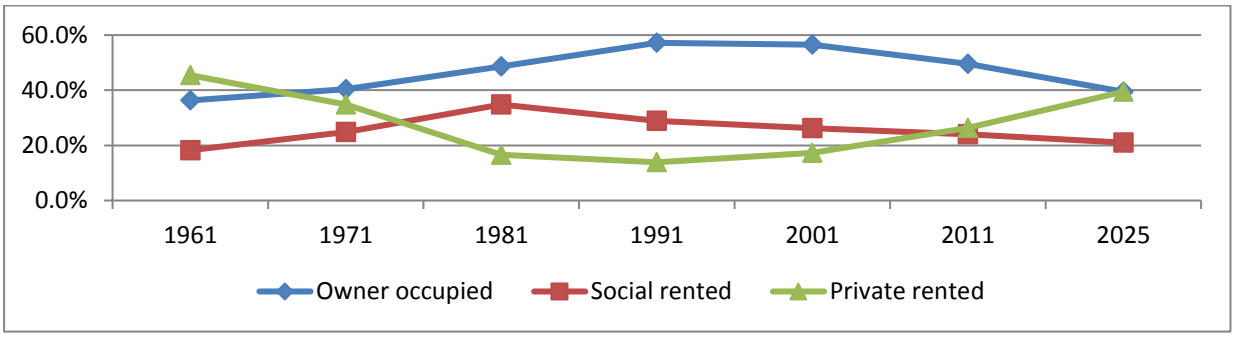


7.10 Intermediate rent products can meet a wider housing need for households on moderate incomes who cannot access social housing because they cannot gain a preference on a council housing register and are reliant on the private rented sector to address their housing needs. To ensure that a sufficiently wide range of households can have access to intermediate rent units, OPDC will require intermediate rent homes to be afforded by households on a range of incomes, including local median household incomes as set out in Table 4 above.

7.11 Housing tenure has changed dramatically in London in the last 30 years. Home ownership with a mortgage has declined from 40% of households in 1990 to under 28% in 2016 with this being offset by more households living in the private rented sector. PwC estimates that by 2025, 39.5% of Londoners will live in the private rented sector[8], see Chart 5 below. The PwC projections used key predictors of historical trends in private renting and home ownership (including demographic trends, housing supply, historic mortgage volumes and mortgage loan to value ratios) and assumptions about how each of these factors would develop and vary between regions until 2025. Shared Ownership has been a relatively small proportion of the owner-occupied tenure to date but can offer a route for households towards home ownership where affordability is an issue.

[7] Private rented sector statistics, Valuation Office Agency March 2016
[8] Housing in London 2017, GLA

Chart 5- London tenure trends



7.12 The decline in owner-occupation can be partly explained by the fact that increases in salaries have not kept pace with house prices. This has meant that home ownership has become increasingly unaffordable in London. In 2016 lower quartile house price to earnings ratios were 14.68 in Brent, 14.46 in Ealing and 19.40 Hammersmith & Fulham; up from 4.55, 4.53 and 5.63 in 1997. Only 16 Help to Buy Equity loans[9] have been completed in Hammersmith & Fulham since the scheme began in 2013. This compares with 171 in Brent and 203 in Ealing. The three OPDC boroughs account for just 3% of all London Help to Buy: NewBuy completions. This allows borrowers to secure up to a 95% loan to value mortgage on a new-build property. The average total applicant household income for the households accessing Help to Buy in London in 2016 was £73,347. These schemes can help more households to access owner-occupation in addition to providing for Shared Ownership opportunities.

7.13 The London Plan sets the following income limits for London Shared Ownership properties:

- household incomes of no more than £90,000 to support an initial purchase of between 25% and 75% of the value of a property;
- maximum expenditure of 40% of household earnings to be spent on housing costs (including mortgage, rent on retained equity and service charges);
- mortgage deposit of around 10% of the share to be purchased; and
- initial rents on the unsold equity can be no more than 2.75% of the value of the unsold equity.

7.14 Officers have considered the potential affordability of London Shared Ownership in the area based on the expected value of the properties coming forward. An analysis of the calculations made in the Affordable Housing Viability Assessment has determined that it can be provided below these income limits for 1 and 2 bed units but that the income required to support the minimum 25% equity share is likely to be higher than median household incomes in the area. However, they can be afforded by two full-time moderate earners working in public service in London and buying a Shared Ownership property together. For example, two newly qualified main scale teachers could expect a combined annual salary of approximately £56,000[10]. Similarly, two new police constables could expect a combined salary and benefits of approximately £59,000[11] per annum and two grade 6 NHS experienced nurses could expect a combined annual salary of approximately £52,000. 3 bed units may also be afforded by two full-time moderate earners buying together if the rents on the unsold equity are less than the maximum 2.75%.

[9] Help to Buy (equity loan scheme and NewBuy) April 2013 to 31 December 2016
[10] https://www.tes.com/jobs/careers-advice/pay-and-conditions/qualified-teachers-pay-scales
[11] http://www.metpolicecareers.co.uk/newconstable/being-a-pc.php

7.15 Key to maintaining affordability in the long-term will be ensuring that any ground rents or service charges are manageable for occupiers of affordable housing. OPDC will work with the Mayor of London, Homes for Londoners and Registered Providers on the establishment of a service charges charter to ensure that charges are affordable for affordable housing tenants and leaseholders. This should include some certainty around future price rises.

7.16 In determining its affordable housing tenure policy OPDC has taken into account the need identified in the OPDC SHMA for London Affordable Rent housing and the need for intermediate housing identified in the GLA's SHMA. In setting policy OPDC is required to be in general conformity with the Mayor of London's Affordable Housing and Viability SPG and draft new London Plan to maximise the overall delivery of affordable housing to help the Mayor of London to achieve his objectives which include delivering half of all homes in London as affordable. OPDC has considered the range of preferred tenures in the Affordable Housing and Viability SPG, including London Shared Ownership for people who aspire to enter home ownership now and London Living Rent for people who aspire to own their own home in the future but cannot afford to save a deposit because of the cost of standard private renting. Opportunity Areas are required to achieve more than 35% affordable housing and where viable achieve 50% affordable housing. As can be seen in section 9, the only way to do this is by having an affordable housing tenure policy which is 30% London Affordable Rent and 70% intermediate.

7.17 In accordance with the NPPF, the Local Plan must meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. OPDC has set out objectively assessed need (OAN) in the SHMA which has determined that there is a need for 1,200 homes within the redline boundary. Whilst the proposed tenure split in the Local Plan of 30% London Living Rent and 70% Intermediate Housing (including London Living Rent and Shared Ownership) does not directly marry up with the tenure requirements in the SHMA, the objectively assessed need in terms of tenure split is likely to be achieved due to the over delivery of housing above the objectively assessed need for 1,200 homes as demonstrated by the Development Capacity Study and phasing plan (as set out in Table 1).

7.18 The Local Plan tenure split must also be justified, as it should be the most appropriate strategy when considered against reasonable alternatives. As can be seen in more detail in section 9 below, an Affordable Housing Viability Assessment 2017 has been undertaken which assessed the viability of delivering 35% and 50% affordable housing[12] in a range of tenures. This concluded that 70% of the affordable housing being London Affordable Rent is never viable on any of the sites tested at either 35% affordable housing or 50% affordable housing. Therefore, as the draft new London Plan sets a clear 50% target for OPDC, it is considered to be justified to apply the proposed tenure split given the viability evidence in relation to the impact of delivery of London Affordable Rent.

7.19 The affordable housing tenure split that has been chosen accords with the policies of the NPPF in that it is Social Rented, Affordable Rented and Intermediate housing, provided to eligible households whose need are not met by the private market.

[12] In accordance with the threshold approach in the Affordable Housing and Viability SPG and draft new London Plan 2017

Eligibility is determined with regard to local incomes and local house prices. The tenures chosen will include provisions that they remain at an affordable price for future eligible households. The tenures also accord with the draft new London Plan 2017.

8.0 Housing mix

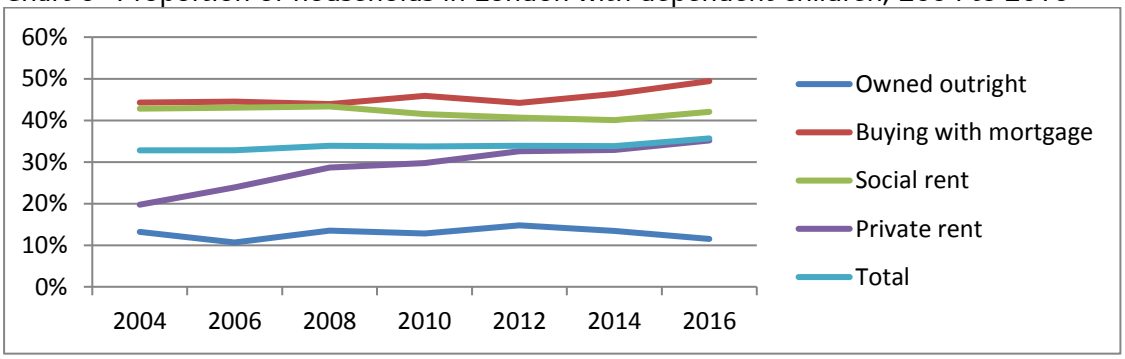
8.1 OPDC's SHMA has also identified that there is a clear need for family sized housing units (3 or more bedrooms) across the affordable (51%) and market (64%) respectively (see Table 6 below).

Table 6 – OPDC's SHMA bed requirements by tenure

Bed size	SHMA need in Market	SHMA need in Affordable			
		All affordable	London Affordable Rent	London Living Rent	Shared Ownership
1	13%	21%	23%	3%	19%
2	23%	28%	28%	25%	35%
3	53%	35%	34%	47%	33%
4+	11%	16%	15%	25%	13%
	100%	100%	100%	100%	100%

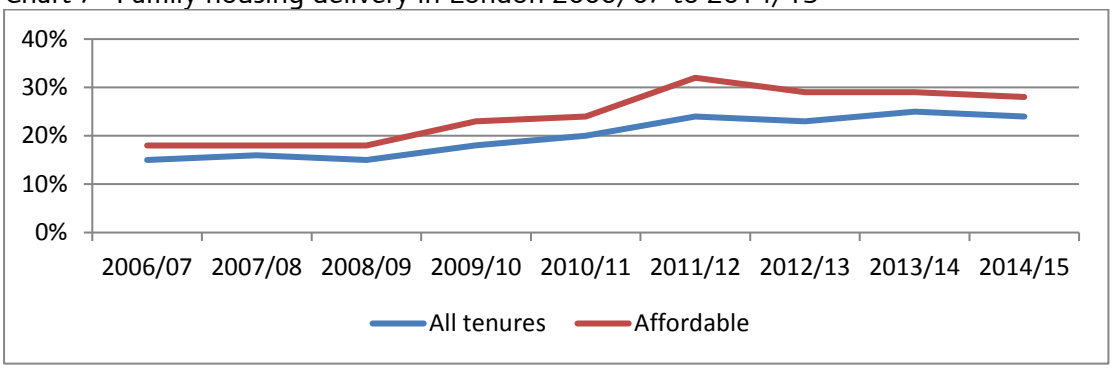
8.2 Data on Londoners housing needs from the Labour Force Survey supports the need for more family housing (see Chart 6 below). This has shown that the number of households with dependent children is growing in London, particularly in the private rented sector and home ownership with mortgage sector.

Chart 6- Proportion of households in London with dependent children, 2004 to 2016



8.3 However, on average in London over the last nine years, the housing market and existing planning practice has delivered only 20% of all tenures and 24% of affordable tenures as family housing units, well below the need identified in OPDC's SHMA (Chart 7 below). Providing a range of different dwelling types and sizes supports the creation of mixed, balanced and sustainable communities and will help to meet the housing need of a range of household types.

Chart 7- Family housing delivery in London 2006/07 to 2014/15



8.4 The identified SHMA need for family housing needs to be considered against the design and nature of the proposed development at Old Oak and Park Royal and development viability and economics, which are not considered as part of the SHMA assessment.

8.5 The average density of the proposed development in Old Oak and Park Royal is expected to be high density and the built form is expected to be high density blocks of flats rather than lower density houses with generous private gardens, making a high family housing target challenging and undesirable as many units would be unable to access appropriate amenity and play space.

8.6 A further consideration is the affordability of family housing in locations such as Old Oak and Park Royal and particularly the affordability of intermediate housing for families. Analysis of Shared Ownership values in recent planning applications shows that 3 bed Shared Ownership units are at the top of the income limits set out in the London Plan and 4 bed Shared Ownership units may breach the income limits. However, Shared Ownership units may be afforded by two full-time public-sector workers buying together as demonstrated in paragraph 7.13 where registered providers charge rent at less than the maximum rate of 2.75% on the retained equity. Rents should be set on family intermediate rental homes at levels that are affordable for a range of household incomes as described in paragraph 7.9.

9.0 Development viability

9.1 In addition to the SHMA, which identifies need, OPDC has also produced an Affordable Housing Viability Assessment (AHVA) which has evaluated the economic viability of delivering affordable housing in a range of different scenarios both in terms of tenure and bed size. This has been used in addition to the data on housing needs to set OPDC's housing policies.

9.2 A viability assessment has been carried out on five one hectare notional sites across the OPDC area with a range of densities and locations (Table 7 below). Each notional site also has different characteristics in terms of potential sales values and existing use values and more details of each site are set out in Table 8. This analysis has allowed officers to consider how best to achieve the Mayor's affordable housing requirements, whilst also considering the specific requirements of this complex brownfield site.

Table 7- Description of the five 'notional sites' tested

Site	Location	Density (range 300-600 dwellings per hectare)
Site A1	Old Oak North	Higher
Site A2	Old Oak North	Average
Site B	North Acton	Average
Site C	East Old Oak	Mid-low
Site D	Old Oak South (HS2/Crossrail)	Highest

9.3 The AHVA assesses each of the five sites on the basis of delivering both 35% and 50% affordable housing (measured in habitable rooms, in accordance with the requirements of the draft Affordable Housing and Viability SPG).

9.4 The appraisals also assess a number of tenure scenarios within the overall percentage of affordable housing, which are set out below. Each of these tenure scenarios are compliant with the Mayor's draft Affordable Housing and Viability SPG in that at least 30% is London Affordable Rent and at least 30% is London Living Rent and/or Shared Ownership, i.e. intermediate tenures. For the purposes of this study, all Intermediate values have been modelled as London Shared Ownership. The affordable housing tenures tested are as follows:

- 70% London Affordable Rent and 30% Intermediate. This scenario aims to help meet the London Affordable Rent need identified in the SHMA;
- 43% London Affordable Rent and 57% Intermediate; and
- 30% London Affordable Rent and 70% Intermediate. This scenario aims to maximise the overall value of development to support the building of more affordable units.

9.5 A summary of key outputs from the main financial analysis are shown in the Table 7 below and the full set of outputs are in Appendix 4. The unviable scenarios in the table are shown in red. In summary, the main viability work on housing and tenure completed to date demonstrates that:

- At 50% affordable housing:
  - Three of the sites were able to deliver an affordable housing tenure mix that included 30% London Affordable Rent and remain viable;
  - However, none of the sites tested were able to deliver either 70% or 43% London Affordable Rent.
- At 35% affordable housing:[13]
  - Four of the sites were able to deliver an affordable housing tenure mix including both 30% and 43% London Affordable Rent and remain viable although viability was generally marginal at 43%.
- However, none of the sites tested were able to deliver 70% London Affordable Rent. The appraisals are very sensitive to both the overall percentage of affordable housing but also the percentage of London Affordable Rent as this tenure generally has values of less than one third of private values whereas London Shared Ownership has values of approximately two thirds of private sales values.

[13] The Affordable Housing SPG sets a minimum threshold of 35% affordable housing and 50% on public and previously industrial land, see paragraph 3.5 and appendix 1

- The appraisals are also very sensitive to potential sales values, construction costs (which are linked to density) and existing use land values (Threshold Land Values) and the viability of the notional sites varies at the same tenure mix depending on these factors. Site B, which that has a higher Threshold Land Value and the lowest sales values, cannot deliver 35% affordable housing even with the lowest percentage of London Affordable Rent.

Table 8- Summary of viability testing

INPUTS	Site characteristics	Site A	Site A2	Site B	Site C	Site D
	Density	Higher	Average	Average	Mid-low	Highest
	Construction costs	Higher	Average	Average	Mid-low	Higher
	Sales values	Higher	Medium	Lower	Medium	Higher
	Threshold Land Value	Medium	Medium	High	Medium	Low
OUTPUTS		**Site A**	**Site A2**	**Site B**	**Site C**	**Site D**
Overall % affordable	**% London Affordable Rent**					
50%	70%	No	No	No	No	No
	43%	No	No	No	No	No
	30%	No	Yes	No	Yes	Yes
35%	70%	No	No	No	No	No
	43%	Marginal	Yes	No	Yes	Yes
	30%	Yes	Yes	No	Yes	Yes

9.6 These appraisals have been based on an assumed bed size mix using the SHMA family housing mix for London Affordable Rent and market delivery sizes for Intermediate and market housing. This is a realistic delivery scenario which means that SHMA minimum needs are being met for the families in the most acute housing need whilst recognising that the market may direct the delivery of market and intermediate tenures. To test the impact of delivering different bed size mixes, on one notional site, the impact of delivering a broad range of different housing size mixes has also been considered including:

- SHMA mix for all tenures: London Affordable Rent, Intermediate and market meaning large amounts of family housing overall;
- Market delivery for all tenures London Affordable Rent, Intermediate and market; and
- 25% family housing overall to include SHMA compliant London Affordable Rent, recognising that the market can be incentivised to increase the delivery of family housing above the current 20% pan-London provision.

9.7 Site A2 was used to examine the impact of the delivery of different size mixes at both 35% and 50% with the percentage of London Affordable Rent at 30%. The detailed results are set out below (Table 9 with the unviable scenarios shown shaded red and demonstrates the following:

- Of the four bed size mixes tested, the most viable is the market delivery of unit sizes across all tenures which generally results in smaller units. The least viable is the delivery of all units at the size requirements set out in the SHMA which generally means larger units;
- A greater emphasis on 1 and 2 beds units increases the overall viability of development as these units usually have a higher value per square foot and

maximises the overall number of affordable housing units that could be delivered;

- A balance will need to be struck between housing size mix need and delivering overall affordable housing requirements;
- 25% family housing is achievable at 35% affordable housing. At 50% it is marginally unviable on this particular notional site.

Table 9- family housing sensitivity testing

Site A2 - Residual Land Values – Threshold Lane Value is £8,300,000		
Unit size mix	**35% affordable housing**	**50% affordable housing**
SHMA	£9,925,000	£4,400,000
25% family	£13,725,000	£8,075,000
SHMA for LAR and market for private and shared ownership	£14,550,000	£8,825,000
All market	£14,350,000	£9,550,000

9.8 It is important to note that the viability work completed to date by OPDC is to the level of detail appropriate to inform policy work. It includes the level of CIL identified in the Preliminary Draft Charging Schedule but not the infrastructure requirements needed to comprehensively unlock development sites across the Old Oak and Park Royal and appropriately mitigate the impact of development proposals**.**

10.0 Affordable Housing Tenure Mix Policy

10.1 As described in section 3 the London Mayor plans to maximise the delivery of affordable housing and to work towards a target that 50% of new housing in London is genuinely affordable. Over the last 10 years, between 2007/08 and 2015/16, on average 32% of net conventional housing completions have been affordable and over the last 5 years on average only 29% of net completions have been affordable[14]. The types of affordable tenures have changed during this time. In 2007/08 roughly 50% of the affordable completions were social rent properties and 50% were intermediate while by 2015/6 only 19% were social rent, 44 % were intermediate and 37% were affordable rent.

10.2 As a Mayoral Development Corporation with a large reservoir of brownfield land OPDC can help the Mayor to increase the overall provision of new housing supply and maximise the delivery of affordable housing.

10.3 In light of the above, OPDC has set an affordable housing policy on the following grounds:

- an overarching 50% affordable housing target (measured by habitable room and in accordance with the draft Affordable Housing and Viability SPG). It would be recognised that this target may be challenging to achieve on all individual sites and that public-sector support would likely be required to achieve this target in many instances (including for example: affordable housing grant, capital infrastructure grant, public borrowing etc.);

[14] London Development Database

- a tenure split of 30% London Affordable Rent (equivalent to social target rents) and 70% Intermediate housing including Shared Ownership and London Living Rent in order to maximise the overall level of affordable housing delivered at Old Oak and Park Royal;
- applications for planning will be required to provide homes that are affordable to households on a range of incomes, including local average household incomes in the host local authority and demonstrate how the proposed tenure mix compares to local average household incomes;
- support for the approach set out in London Mayoral guidaince which incentivises developers to achieve a threshold leve of affordable housing; and
- clear recognition that many of the development sites across the OPDC area are complex and will require significant infrastructure to unlock and that these requirements would need to be considered on a site by site basis. The level of viability work completed by OPDC to date has not been able to consider this level of complexity.

10.4 Officers consider that this approach would strike the right balance between setting an ambitious target, which could potentially be achieved on some higher density and higher sales value sites without significant infrastructure costs, whilst recognising that viability would always be a legitimate consideration, and also that the high cost in development viability terms of delivering London Affordable Rent would mean that requiring in excess of 30% of this tenure would render almost all sites unviable at 50% affordable housing.

10.5 As well as building new homes the OPDC area is identified in the London Plan as having the potential to provide 65,000 jobs. This target tenure mix will support the local economy by providing a range of homes at different affordable price points to meet the needs of people working in the new jobs and businesses that will be created as a result of the intensification of existing employment uses and creation of new employment uses in the area.

11.0 OPDC Size Mix

11.1 Providing a range of different dwelling types and sizes supports the creation of mixed, balanced and sustainable communities and will help to meet the housing need of a range of household types. There is a need for more family housing as identified in OPDC's SHMA. However, the modelling shows that this has an impact on the viability of delivering high levels of affordable housing. On balance, OPDC considers that the policy approach should be to deliver 25% family housing. The overall housing mix should include delivering the size mix for London Affordable Rent that is set out in the latest SHMA.

11.2 This will provide the following benefits:

- It requires the housing market to deliver a minimum level of family housing provision slightly above the London average market delivery to date recognising the fact that the SHMA and evidence from the Labour Force Survey shows that the number of households with children is increasing;
- It meets the acute need for London Affordable Rent family housing identified in the SHMA but also provide some market family and intermediate family housing to meet needs;

It helps to ensure that all family units are appropriately designed and located to be suitable for families. Setting an artificially high family housing target would mean that many units delivered would not have access to acceptable private or communal amenity space or other amenities. These units would unlikely be attractive to families with children.

12.0 Buid to Rent

12.1 In accordance with the Mayor's draft Affordable Housing and Viability SPG, 'Build to Rent' will be required to provide affordable housing in the form of intermediate rental homes. This would preferably be at rent levels equivalent to London Living Rent, but the level of discount will need to be considered on a site by site basis and will be subject to viability. Build to Rent operators will not normally be required to provide London Affordable Rent or Shared Ownership units as this would mean that these units would have to be managed separately by a Registered Provider rather than managed as part of a whole block. There will also be some flexibility in terms of unit site mix as specified in the draft SPG. It can also speed up house-building and supporting OPDC in achieving its annual housing target.

12.2 As has been described in paragraph 7.10. the private rented sector is London's fastest growing tenure. With long waiting lists for social housing and access to owner occupation requiring large cash deposits, the private rented sector is now the predominant gateway tenure for households new to London. Purpose built private rented housing can help to establish vibrant new communities in the area and contribute to place making, particularly in the early stages of the regeneration programme.

12.3 Build to Rent will therefore be supported to help support delivering early place making and contribute to mixed tenure communities. Build to Rent schemes will be, subject to appropriate management arrangements being in place to ensure that blocks are well maintained and that there are no adverse impacts on neighbouring amenities and other residents. Build to Rent schemes will also be requires to make an appropriate contribution to affordable housing to ensure that they are accessible to people on low and medium incomes.

13.0 Specialist housing

13.1 Specialist and supported housing can provide settled accommodation, offer security of tenure and provide increased opportunities for independent living for adults with a range of long-term conditions, including dementia, learning disabilities, autism, physical, neurological and sensory disabilities, and problems with substance misuse, including drugs and alcohol. We will work with the London boroughs of Brent, Ealing and Hammersmith and Fulham to identify where there is potential to make additional provision in the OPDC area.

13..2 Based on the projected growth in population aged 75+ identified in the SHMA the table 10 below identifies the potential additional requirement for new specialist housing (using the Housing LIN Older People Resource Pack 2012). This represents 6.3% of the overall housing need in the area.

Table 10- Additional Modelled Demand for Older Person Housing (Source: Housing LIN Toolkit)

Specialist housing type	Owned	Rented
Sheltered housing	0	1,900
Extra-care	1,000	500
Sheltered-plus	300	300
Dementia	200	0
Leasehold schemes for the elderly[15]	3,900	0
Total	8,100	

13.3 The London Plan (2015) contains indicative annualised strategic benchmarks to inform local targets and performance indicators for specialist housing for older people. The annual target benchmarks for the OPDC boroughs are contained in Table 11 below.

Table 11-Annual indicative requirement benchmarks

	Private sale	Intermediate	Affordable rent	Total
Brent	105	35	35	175
Ealing	135	40	5	180
Hammersmith & Fulham	45	15	0	60

13.4 In order to help meet the need for specialist housing, OPDC will require that residential schemes of more than 1,000 units should provide for at least 10% specialist housing units on site. Large housing developments are more likely to be able to provide specialist housing units at scale, across the site and also provide additional facilities and services that may be able to support the needs of residents. The Whole Plan Viability work has tested the provision of specialist older persons housing.

13.5 The London Plan benchmarks identify the need for intermediate and affordable rent units for older people, which is expected to form the majority of the specialist housing needs. As such, all forms of specialist housing will be required to provide affordable housing where they are self-contained housing units behind a lockable front door containing the normal facilities for cooking, eating and sleeping associated with use as a dwelling house i.e. they afford the facilities required for day to day private domestic existence.

14.0 Shared housing needs

14.1 One particular statistic from the 2015 round GLA households projections is that the number of single person households aged 16-24 years in Brent, Ealing and Hammersmith and Fulham is projected to fall from 1,042 households in 2017 to 279 households in 2037, while single person households aged 25-34 years are projected to fall from 7,127 households in 2017 to 2,735 households in 2037.

14.2 The overall vision for Old Oak and Park Royal is to provide new communities that are balanced and sustainable and meet a range of housing needs. Purpose-built shared housing schemes can make a contribution to this and support the sharing economy. It

[15] The Elderly Accommodation Council advise: 'Leasehold Schemes for the Elderly (LSE) are run by a small number housing associations and involve you buying a proportion (e.g. 70%) of the equity of the property, the remaining portion of the equity being owned by a Registered Provider

can play a role in meeting the housing needs of young professionals requiring employment mobility and others who would benefit from shared facilities.

14.3 Purpose-build shared housing will be supported as part of a mixed and balanced community in appropriate locations and be subject to management arrangements to ensure that the housing is well-maintained and that any adverse impacts on neighbouring amenities and residents are mitigated. Purpose-build shared housing will be required to provide an off-site contribution for affordable housing.

15.0 Gypsies and travellers

15.1 In August 2015 the Government announced changes to Gypsy and Traveller planning guidance, called Planning Policy for Traveller Sites (PPTS)[16]. The PPTS amended the definitions of gypsies and travelling showpeople for planning purposes, meaning that planning authorities are no longer required to plan and provide pitches for the needs of gypsies and travellers who do not travel for an economic purpose. According to the planning definition there is no current requirement to provide additional pitches

15.2 Analysis of the existing households who do not meet the planning definition indicated that there will be a need for 12 households not travelling for work over the plan period. The need from the 12 newly forming households form 0.1% of the total objectively assessed housing need that is identified for OPDC's housing market area.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

Appendix 1- London Mayor's housing policy

The Mayor of London is committed to a long-term strategic aim that half of all new homes in London will be genuinely affordable to the people they are intended for. The Mayor intends to move towards this goal by investing more in affordable housing, bringing forward more public-sector land for development, and by increasing the amount of affordable housing delivered through the planning system. OPDC is working with the GLA to align housing policy, where possible.

Viability appraisals

The Mayor's Affordable Housing and Viability SPG aims to increase the overall delivery of affordable housing by incentivising developers and Approved Providers through a threshold approach to viability and review. Where a scheme will deliver at least 35% affordable housing by habitable room there will be no requirement to provide viability information and no review mechanism if the development is commenced within 2 years. Where a scheme will deliver less than 35% affordable housing there will be a requirement to provide viability information and the scheme will be subject to review mechanism(s).

The Mayor has appointed an in-house GLA viability team to assist with viability appraisals and OPDC is working closely with this emerging team.

Tenure mix

The Mayor has specified his preferred affordable housing tenure mix as follows:

- Low cost rents for social housing applicants will now be called **London Affordable Rents** – effectively social housing target rents set at the maximum cap allowed by government regulations. Affordable rent homes based on 80% market rent are not considered to be affordable by the Mayor for social housing applicants.
- **London Living Rent** – rents based on one third of local wages generally higher than London Affordable Rents and approximately 50% of market. This is an intermediate product intended to enable people to save a deposit and access shared ownership market housing.
- **London Shared Ownership** – similar to existing standard shared ownership but purchasers can earn up to £90,000 to access these homes.

The Mayor has specified that at least 30% of the affordable housing should be London Affordable Rent and at least 30% should be at Shared Ownership and/or London Living Rent. The tenure mix of the remaining 40% should be determined by the local planning authority and can include the tenures listed above and other tenures that meet the requirements of the National Planning Policy Framework (NPPF). However, they will need to be genuinely affordable for the people they are intended for.

The Mayor's Affordable Housing Programme and Grant Funding

There will be three funding routes available through the GLA's affordable homes programme:

1. **Approved provider route:**

This route is only open for those Approved Providers who ensure that at least half of their London housing starts between April 2015 and March 2021 are affordable. The set grant rates are:

- London Affordable Rent - £60,000 per home, when rent is set at or below the benchmark levels.
- London Living Rent and London Shared Ownership – £28,000 per home
- Grant rates can be applied across all schemes approved providers control (including 50:50 JVs).

2. **Developer led route:**
   A single set grant rate of £28,000 is available to increase the level of affordable housing (by habitable room space) on developer-led schemes.

   Where a developer can increase the level of affordable housing on a development to 40% or more through the use of grant, the £28,000 set grant rate can be applied to all affordable homes across development. Where a developer increases the level of affordable housing, but not up to or above 40%, the £28,000 set grant rate can be applied to the additional homes.

3. **Negotiated route:**
   This is primarily expected to be for supported and specialised housing projects and other uses on an exceptional basis. The negotiated route will only be approved where the GLA is satisfied the homes will be genuinely affordable. Grant rates will be expected to be significantly below the £60,000 single set grant rate.

The Mayor is keen to maximise affordable housing on public land. Public sector organisations, and providers bringing forward projects on public land, are encouraged to engage fully with the GLA at an early stage, in order to maximise affordable housing provision. OPDC is working with the GLA to consider options for how best to realise this Mayoral objective on public and private land across the area.

The "Homes for Londoners" Board has been established by the Mayor to coordinate the delivery of affordable homes. The Mayor's recent review recommended that OPDC work closely with the new Homes for Londoners and work is already underway.

Appendix 2- Worked example of London Living Rent (LLR) setting

1. Annualised median gross household income for London is calculated from Households Below Average Income (HBAI) data. Using the latest available data (currently the 2014/15 dataset), this gives a figure of £35,618.

2. To estimate median household income for individual local authorities, this London-wide figure is re-scaled at borough level using data from the Annual Survey of Hours and Earnings (ASHE), specifically the average of the last three years of annual gross pay. For example, the median gross annual pay for all employees in London average over the three years 2013 to 2015 was £28,112, while in Hammersmith and Fulham it was £33,378, around 18% higher. Applying this increment to the London-wide household income figure in paragraph1 results in an estimated median household income figure for Hammersmith and Fulham of around £42,290.

3. These estimated local median household income figures are divided by three and then again by twelve to give borough-level monthly rent benchmarks for two-bedroom LLR homes. In Hammersmith and Fulham this figure is £1,175.

4. To reflect neighbourhood-level market conditions, these monthly two-bedroom benchmarks are varied at ward level by a maximum of 20% above or below, in line with the median price for flats sold in the ward over the last three years. For example, in Hammersmith and Fulham the highest ward-level figure is in the Sands End ward at £1,410, while the lowest is in Wormholt & White City ward at £940.

5. The ward benchmarks derived above are for two-bedroom homes, and the rent for units of different sizes varies from these benchmarks by 10% per bedroom. So for College Park & Old Oak (the London Borough of Hammersmith & Fulham ward within the OPDC area) the breakdown is as follows::

One bedroom	Two bedrooms	Three bedrooms	Four bedrooms	Five bedrooms	Six bedrooms
£863	£959	£1055	£1151	£1246	£1342

6. Finally, to ensure that LLR homes are always considered affordable in planning terms, the rent for every home must at least 20% below the assessed market rent for that unit.

Appendix 3 – Housing completions by bed size

Table A-OPDC SHMA compared to London actual completions

Bed size	OPDC SHMA Affordable %	Average affordable completions in London[17]	OPDC SHMA Private %	Average Private completions in London	Average all tenure completions in London[18]
1	21%	33%	13%	37%	36%
2	28%	39%	23%	43%	41%
3	35%	21%	53%	14%	16%
4+	16%	7%	11%	6%	7%
	100%	100%	100%	100%	100%

Table B-Gross family housing conventional completions in OPDC local authorities all tenures and affordable tenures

	Policy: % family housing	2012/13		2013/14		2014/15	
		All	Affordable	All	Affordable	All	Affordable
Brent	25% all tenures & 50% affordable housing	23%	35%	25%	36%	19%	28%
Ealing	50% affordable housing. Market housing not specified	18%	24%	16%	17%	20%	18%
H & F	45% affordable rent & 15% intermediate. Market housing not specified	13%	0%	13%	23%	19%	12%

[17] GLA AMRs average gross completions 2011/12 to 2014/15 - social rent, intermediate and affordable rent
[18] GLA AMRs average gross completions 2011/12 to 2014/15 – all housing

Appendix 4-AHVA Development Viability

	% London Affordable Rent	Site A	Site A2	Site B	Site C	Site D
50% affordable housing	70% London Affordable Rent	No	No	No	No	No
	43% London Affordable Rent	No	No	No	No	No
	30% London Affordable Rent	No	Yes	No	Yes	Yes
35% affordable housing	70% London Affordable Rent	No	No	No	No	No
	43% London Affordable Rent	Marginal	Yes	No	Yes	Yes
	30% London Affordable Rent	Yes	Yes	No	Yes	Yes