



HOUSING DELIVERY STATEMENT

PENTAVIA RETAIL PARK,
WATFORD WAY, MILL HILL, LONDON, NW7 2ET

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EXECUTIVE SUMMARY

- 1 This Housing Delivery Statement ('the Statement') has been prepared on behalf of Meadow Residential ('the Applicant') in respect of Pentavia Retail Park, Mill Hill, London, NW7 2ET ('the Application Site').
- 2 A planning application has been submitted for 844 new homes alongside new commercial floorspace, car parking, landscaping and public realm improvements ('the Application'). The Application is of strategic importance for housing delivery in both Barnet and London. The proposals have been subject to extensive pre-application discussions and consultation with the London Borough of Barnet, the GLA, statutory consultees, local stakeholders and members of the public.
- 3 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. In this context, the following housing related considerations are directly relevant to the determination of this planning application:-
 - **Housing Numbers:** The scheme will provide 844 much needed new homes. This will optimise the use of an underutilised brownfield site and will contribute positively to meeting local and strategic London wide housing need in accordance with the Development Plan and the Draft London Plan.
 - **Housing Types:** The scheme will provide a mix of Build-to-Rent and Conventional Sale housing. The Build-to-Rent homes will be covenanted for rental use to secure a range of benefits including professional on-site management/ maintenance support, fair tenancy terms and faster delivery.
 - **Housing Tenures:** The scheme will provide 345 new affordable homes on-site (41%). This exceeds the local policy target (40%) and is compliant with Policy H6 (Threshold Approach) of the Draft London Plan (2018) which requires 35% Affordable Housing. The provision of 345 new affordable homes will provide a significant contribution to both local and strategic London wide affordable housing need (of which Barnet only met 22% in the last 3 years). A review mechanism will enable this to increase to up to 50% (subject to the availability of grant and delivery timescales).
 - **Housing Products:** The scheme will provide a mix of genuinely affordable housing products including London Affordable Rent, London Living Rent, Discounted Market Rent and London Shared Ownership compliant with Policy H7 (Affordable Housing Tenure) of the Draft London Plan (2018).
 - **Housing Affordability:** The proposed product terms will ensure the homes are genuinely affordable to a range of eligible local households in accordance with the Mayor's Housing Strategy (2018). The Build-to-Rent homes will be prioritised to local front line key workers (e.g. teachers and nurses).
 - **Housing Management:** The housing products have been distributed across the site to enable effective long term management. The Build-to-Rent products will be pepper potted to promote social cohesion. The scheme has also been designed to ensure estate service charges are as affordable as possible, whilst allowing all residents the right to access on-site amenities.
 - **Housing Sizes:** The scheme will provide a mix of housing sizes including 123 (15%) 3 bedroom family homes. The mix of unit sizes take into account growing demand for smaller unit sizes (particularly in Build-to-Rent), the affordability challenges associated with larger homes (particularly in shared ownership) and the positive role 1 and 2 bedroom homes play in providing housing for down sizers and concealed households, as recognised in Draft London Plan (2018).
 - **Housing Design:** All homes have been designed so that they are tenure blind and meet or exceed the design standards set out in the Development Plan and Draft London Plan (2018).
- 4 Overall this Statement demonstrates that the housing proposals are appropriate for the site and proposed development in accordance with the statutory Development Plan and other material planning considerations and should be afforded significant positive decision making weight.

1 INTRODUCTION

- 1.1 This Housing Delivery Statement ('Statement') has been prepared on behalf of Meadow Residential ('the Applicant') in respect of Pentavia Retail Park ('the Application Site').
- 1.2 A planning application has been submitted for 844 new homes alongside new commercial floorspace, car parking, landscaping and public realm improvements ('the Application').
- 1.3 Planning law¹ requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 1.4 This Statement provides evidence which seeks to demonstrate the amount, type and mix of housing proposed in the planning application is appropriate for the site and development proposal in accordance with the statutory Development Plan and other material planning considerations.
- 1.5 This Statement is structured to provide: -
 - An overview of the application site and the application proposals (Section 2);
 - An overview of relevant policy and guidance (Section 3);
 - An overview of objectively assessed local housing need (Section 4);
 - Details and assessment of the housing proposals (Section 5); and
 - A summary of the overall conclusions (Section 6).
- 1.6 This Statement should be read in conjunction with a number of the other planning application documents, including but not limited to the Planning Statement, the Design and Access Statement and the Application Drawings.

¹ Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990

2 APPLICATION OVERVIEW

- 2.1 This section of the Statement provides an overview of the planning application site and the development proposals.

Application Site

- 2.2 The Application Site application measures 3.66 hectares (ha) and is located in the Mill Hill ward to the north of the London Borough of Barnet.
- 2.3 The site is an out of town centre Retail Park, known as Pentavia Retail Park, which occupies a triangular plot of land between the A1 (Watford Way) to the east and the M1 (Motorway) to the west. The retail park currently comprises one large retail building located in the north of the site. A smaller restaurant building is located at the southern end of the site at the entrance of the retail park. Extensive ground-level parking forms part of a large hardstanding across the site.
- 2.4 The existing retail development at this site comprises 9,053m² of unrestricted Class A1 retail floorspace with 664m² of Class A3 food and drink floorspace. Three retail planning applications have been approved at the site (Planning permission ref: 14/08075/FUL, date approved 05/08/16; Planning permission ref: 15/01820/FUL, date approved 05/08/16; and Planning Permission ref: 15/01825/FUL, date approved 05/08/16). All three permissions proposed to reconfigure the site layout and the arrangement of the retail and restaurant units.

Development Proposals

- 2.5 The description of development for the Planning Application is as follows:

“Redevelopment of site including the demolition of all existing buildings and construction of 844 new Build to Rent Class C3 residential units, 894 sqm ancillary Class C3 Build to Rent facilities; 405 sqm Class A1 Retail; 326 sqm Class A3 and A4 food; and 297 sqm Class D1 Community; new pedestrian access off Bunns Lane; open space, landscaping; car parking; acoustic mitigation and highway/pedestrian improvements.”

- 2.6 The key features of the planning application are:-

- Clearance of site and demolition of existing retail and restaurant buildings;
- Erection of 18 individual blocks (A to R) of varying heights;
- Delivery of 844 Class C3 homes;
- 894m² (GIA) Ancillary Build to Rent floorspace such as an on-site residents only gym, concierge/post office, security office, maintenance office, workspace hub, residents lounge and meeting space in connection with the Build to Rent units.
- Total provision of 397 residential car parking spaces, of which 85 are for disabled use – ratio of 0.43 spaces per unit;
- Further provision has been made to allow for a further 31 residential car parking spaces within landscaped areas adjacent to the peripheral road to the west of the site. These spaces would result in a ratio of 0.47 spaces per unit;
- Provision of 9 commercial car park parking spaces, of which 2 are for disabled use;
- Provision of 5 car club vehicles on-site;
- Provision of 1,544 long stay residential cycle parking spaces and 30 short stay visitor residential cycle parking spaces – a total of 1,603 residential cycle parking spaces;

- Provision of 29 non-residential cycle spaces;
- Total of 1,028m² (GIA) of Class A1/A3/A4 and Class D1 floorspace;
- Total usable amenity space provision of 16,150m² including:
 - Private Balconies and Winter Gardens – Total of 5,723m²;
 - Private Roof Gardens (used only by the residents of each block) – Total of 3,804m²
 - Courtyard style open green spaces – Total of 6,623m²; and
- 10.9% wheelchair adaptable units (92 units);
- Provision for new pedestrian/cycle link onto Bunns Lane which includes the removal of vegetation and new landscaping; and
- Acoustic mitigation which comprises a naturalistic screen and acoustic barrier with woodland planting to ensure noise levels are minimised along the boundary with the M1 (Motorway) and A1 (Watford Way).

2.7 Blocks A, C, E, G, I, J, L, N, O, Q and R form a long straight building stretching along the western boundary of the site fronting the M1 motorway. Blocks B, D, F, H, K, M and P form a crescent shape building which follows the perimeter of the site boundary with the A1 and Bunn's Lane to enclose the site. Contained within the central of the two buildings are areas of public open space for the development.

2.8 The blocks are stepped in height with the lowest block situated in the north of the site (Blocks P and R) with the height increasing as the development moves south to the tallest block (Block A). All floors from ground level up are residential use, providing a combination of flats over ground level car park and commercial areas.

2.9 A summary of the proposed land uses is set out in Table 1 below.

Table 1: Proposed Land Uses

| Use | Land Use |
|---|-----------|
| Class C3 Residential | 844 Homes |
| Class C3 Ancillary Build-to-Rent Facilities | 894 SQM |
| Class A1 Retail | 405 SQM |
| Class A3/ A4 Food | 326 SQM |
| Class D1 Community | 297 SQM |

2.10 Further details relating to the Application Site location, planning history, and details of the Application proposals are set out in the Planning Statement and the Design and Access Statement, submitted in support of the Application. Details of the Housing proposals are set out in Section 5 of this Statement.

3 PLANNING POLICY & GUIDANCE

- 3.1 This section of the Statement sets out relevant extracts of national, regional and local policy and guidance (including the supporting evidence base) which have informed the proposed approach to housing delivery.

National Policy & Guidance

National Planning Policy Framework (2019)

- 3.2 The National Planning Policy Framework (NPPF), provides the national context for planning in England, including implementing Central Government's housing policy objectives. The NPPF sets out national economic, social and environmental objectives and is an important material consideration in the determination of all planning applications.
- 3.3 The core message in respect of housing provision is that plans and decision-taking should ensure delivery of a wide choice of high quality homes for a range of needs for today and in the future (paragraph 8(b)).
- 3.4 Paragraph 11 of the NPPF outlines an overarching presumption in favour of sustainable development. It confirms that:

“For decision-taking this means: c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

- 3.5 Paragraph 122 of the NPPF confirms that Planning policies and decisions should support development that makes efficient use of land.
- 3.6 Section 5 of the NPPF, 'Delivering a Sufficient Supply of Homes', states that any scheme comprising 5 or more homes should provide affordable housing. It establishes that affordable housing should be delivered on-site. Paragraph 73 confirms:

“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.”

- 3.7 Paragraph 75 confirms:

“To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of underdelivery and identify actions to increase delivery in future years.”

- 3.8 Annex 2 of the NPPF defines affordable housing as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers). It defines four types of Affordable Housing: Affordable Housing for rent; Starter homes; discounted market sale housing; and Other affordable routes to homes ownership. In respect of Affordable Housing for rent it confirms (inter alia) the landlord should be a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider).
- 3.9 Annex 2 also defines Local Housing need as the number of homes identified as being needed through the application of the standard method set out in national planning guidance.

National Planning Policy Guidance (2019)

- 3.10 National Planning Policy Guidance (NPPG) provides guidance on the application of policies set out in the NPPF (2019).
- 3.11 In respect of Housing need it confirms that Housing need is an unconstrained assessment of the number of homes needed in an area (ID: 2a-001-20190220), All households whose needs are not met by the market can be considered in affordable housing need (ID: 2a-018-20190220) and that (ID: 2a-020-20190220):

“Strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of: the number of homeless households; the number of those in priority need who are currently housed in temporary accommodation; the number of households in over-crowded housing; the number of concealed households; the number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and the number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration.”

- 3.12 In respect of Build-to-Rent it confirms (ID60-002-20180913) that:

“Affordable private rent and private market rent units within a development should be managed collectively by a single build to rent landlord. 20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme. If local authorities wish to set a different proportion they should justify this using the evidence emerging from their local housing need assessment, and set the policy out in their local plan [...].

National affordable housing policy also requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents. The discount should be calculated when a discounted home is rented out, or when the tenancy is renewed. The rent on the discounted homes should increase on the same basis as rent increases for longer-term (market) tenancies within the development.”

Regional Policy & Guidance

London Plan (2016)

- 3.13 The London Plan provides the overarching strategic planning framework for London. Policy 3.3 (Increasing Housing Supply) states that there is a ‘pressing need’ for more homes in London. Part B of this policy states that the Mayor will seek to ensure that the housing need identified in paragraphs 3.16a

and 3.16b of the London Plan is met through the provision of at least an annual average of 42,000 net additional homes across London. Table 3.1 sets Barnet a Housing Target of 23,489 between 2015-2025.

3.14 London Plan Policy 3.10 defines Affordable Housing as:

“Affordable housing is social rented, affordable rented and intermediate housing (see para 3.61), provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.”

3.15 Policy 3.11 requires boroughs to set overall affordable housing targets with regard to a number of factors including the need to maximise the provision of affordable housing in light of the London wide delivery target of at least 17,000 homes per annum and having regard to the specific housing targets for their areas. Targets should take account of the London wide target tenure mix, 60% Affordable Rent and 40% Intermediate Housing (Para 3.11), and have regard to a range of other factors.

3.16 Policy 3.12 considers negotiating affordable housing on individual private residential and mixed-use schemes and states:

“The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:

- *current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8 and 3.10 and 3.11 and having regard to guidance provided by the Mayor through the London Housing Strategy, supplementary guidance and the London Plan Annual Monitoring Report (see paragraph 3.68);*
- *affordable housing targets adopted in line with Policy 3.11;*
- *the need to encourage rather than restrain residential development (Policy 3.3);*
- *the need to promote mixed and balanced communities (Policy 3.9);*
- *the size and type of affordable housing needed locations;*
- *the specific circumstances of individual sites;*
- *resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor; and*
- *the priority to be accorded to provision of affordable family housing indicated in policies 3.8 and 3.11.”*

3.17 Part B of Policy 3.12 states that negotiations on sites should take account of their individual circumstances including provisions for re-appraising the viability of schemes prior to implementation ('contingent obligations'), and other scheme requirements.

GLA Affordable Housing & Viability SPG (2017)

3.18 The Mayor's Affordable Housing and Viability SPG (November 2017) provides guidance to ensure that existing London Plan policy is as effective as possible.

3.19 The SPG introduces a threshold approach, whereby schemes meeting or exceeding 35% affordable housing calculated on the basis of habitable rooms without public subsidy, and meeting the tenure split requirements, are not required to submit a viability assessment or have a late stage viability review.

3.20 In respect of Build-to-Rent, the SPG states that:

“Such schemes are beneficial in a number of ways; they have the potential to accelerate delivery and not compete with nearby for sale developments; they can offer longer term tenancies/more certainty over long term availability; they can ensure high quality management through single ownership; and they can ensure a commitment to, and investment in, place making.”

3.21 The SPG also states that Build-to-Rent is particularly suited to higher density development in accessible areas where demand is much greater for 1 and 2 bedroom units.

Revised Draft London Plan (2018)

3.22 The Draft London Plan was published for consultation in December 2017 and amended in August 2018 to reflect consultation responses. Policy H1 (Increasing Housing Supply) of the Draft London Plan sets an overall target of 66,000 new homes every year, compared to the current target of 49,000. Table 4.1 provides a new housing target for Barnet of 31,340 over the plan period (2019-2029), an increase of over 33% compared to the current 2016 London Plan (23,489).

3.23 In respect of affordable housing, emerging Policy H5 (Delivering Affordable Housing) states that the strategic target is for 50% of all new homes to be affordable. Specifically, the policy requires:

“Residential and mixed-use developments to provide affordable housing through the threshold approach (Policy H6 Threshold approach to applications) using grant to increase affordable housing delivery beyond the level that would otherwise be provided.”

3.24 Policy H6 (Threshold Approach to Applications) confirms that privately owned sites providing 35% or more Affordable Housing can follow the fast track route. Meaning a viability assessment and late stage viability review mechanism should not be required. Specifically, the Draft Policy states:

“The threshold level of affordable housing is initially set at a minimum of 35 per cent...[...]

To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:

- *meet or exceed the relevant threshold level of affordable housing on site without public subsidy*
- *be consistent with the relevant tenure split (Policy H7 Affordable housing tenure)*
- *meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant*
- *demonstrate that they have taken account of the strategic 50 per cent target in Policy H5 Delivering affordable housing and have sought grant where required to increase the level of affordable housing beyond 35 per cent.*

Fast tracked applications are not required to provide a viability assessment at application stage. To ensure an applicant fully intends to build out the permission, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough).”

3.25 Policy H12 (Housing size mix) states that schemes should consist of a range of unit sizes having regard to a range of factors including:

- 1) *“the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment and, where available, by evidence of local needs*
- 2) *the requirement to deliver mixed and inclusive neighbourhoods*
- 3) *the need to deliver a range of unit types at different price points across London*
- 4) *the mix of uses in the scheme*
- 5) *the range of tenures in the scheme*
- 6) *the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate locations which are closer to a town centre or station or with higher public transport access and connectivity*
- 7) *the aim to optimise housing potential on sites*
- 8) *the ability of new development to reduce pressure on conversion and, subdivision and amalgamation of existing stock*
- 9) *the role of one and two bed units in freeing up family housing”*

3.26 The supporting text confirms the 2017 London Strategic Housing Market Assessment identified 55% of London wide housing need is for 1 bedroom units. It also states that:

“Well-designed one- and two- bedroom units in suitable locations can also attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development. One-bedroom units play a very important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes.”

3.27 Policy H13 (Build to Rent) recognises that Build to Rent can:

“Accelerate housing delivery through attracting investment into London’s housing market; is less susceptible to housing market cycles and price downturns; will offer longer term tenancies and certainty for tenants; will ensure place-making through single ownership; and will provide better management standards.”

3.28 Paragraph 3.54 of the London Plan states that the Private Rented Sector is the only housing sector to have shown relative growth in recent years (noting that the London Plan was published in 2016) and that it will play an increasingly important role in meeting Londoners’ diverse housing requirements. The paragraph goes on to state that the planning system must take a more positive approach in enabling this sector to contribute to the achievement of housing targets.

3.29 Policy D4 (Housing Quality and Standards) requires new housing development to be of high quality design, provide adequate-sized rooms, with comfortable and functional layouts, which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

3.30 Policy D6 (Optimising Density) states that development proposals must make the most efficient use of land and be designed at the optimum density.

Local Policy & Guidance

Barnet Core Strategy (2012)

3.31 The adopted Core Strategy (2012) sets out the long term spatial vision and strategic objectives for the Local Planning Authority Area.

- 3.32 Policy CS3 (Distribution of Growth in Meeting Housing Aspirations) sets out a housing growth target of 28,000 across the borough during the 15 years of the plan period.
- 3.33 Policy CS4 (Providing Quality Homes and Housing Choice) aims to create successful communities in Barnet by seeking to ensure a mix of housing products in the affordable and market sectors to provide a choice for all households and enable Barnet residents to meet their aspirations of home ownership.
- 3.34 The policy states that Barnet seeks to deliver a minimum affordable housing target of 5,500 new affordable homes by 2025/26. This includes a borough wide target of 40% affordable housing on sites capable of accommodating ten or more dwellings.
- 3.35 Policy CS4 also outlines an appropriate mix of affordable housing for conventional housing schemes as being 60% social rented and 40% intermediate to support the Council's objective of widening home ownership. There is no policy for Build-to-Rent within the Core Strategy.
- 3.36 Policy CS8 (Promoting a Strong and Prosperous Barnet) encourages measures which enable Barnet residents to access work.

Barnet Development Management Policies (2012)

- 3.37 The Development Management Policies document (DMP) (2012) contains policies covering all aspects of development control/management.
- 3.38 Policy DM10 states that having regard to the borough-wide target that 40% of housing provision should be affordable, the maximum reasonable amount of affordable housing will be required on site, subject to viability, from all new sites providing 10 or more units gross or covering an area of 0.4 hectares or more.
- 3.39 Paragraph 11.1.3 notes that in line with the Core Strategy the tenure mix of affordable housing provided within conventional housing schemes should be 60% social/ affordable rented and 40% intermediate. There is no policy for Build-to-Rent within the Development Management Policies.

Barnet's Housing Strategy (2015-2025)

- 3.40 Barnet's Housing Strategy (2015-2025) sets out the Council's strategy for increasing housing supply, delivering homes that people can afford based on the findings of the Council's 2014 Housing Needs Assessment. The strategy recognises:

"The role of the private rented sector (PRS) in meeting the housing needs of the borough has increased significantly over the last decade" and that "purpose built PRS when located within or around town centres can help address distinct housing needs as well as support labour mobility".

- 3.41 Appendix 2 of the strategy confirms that the Council's Strategic Housing Market Assessment (2014) identifies that private market housing can only meet 33% of projected housing need whilst PRS can meet 86%. It also confirms that without PRS 66% of Barnet's households would require Affordable Housing. This evidences the positive role which Build-to-Rent can play in both the private and affordable sectors. The supporting evidence base also demonstrates that a large proportion of Barnet's residents are employed in public admin, education and health (34%).

4 LOCAL HOUSING NEED

- 4.1 This section of the Statement provides an overview of local housing need. These considerations have informed the proposed approach to housing delivery and are important material considerations.

Strategic Housing Need

- 4.2 The London Plan (2016) sets a strategic target to deliver at least 42,000 new homes per annum of which at least of at least 17,000 should be affordable homes. The latest London Plan AMR confirms delivery of new affordable housing on a London-wide basis is significantly below the London Plan target with only 43% of the target being achieved between 2014/15 and 2016/17.
- 4.3 **This evidences there is a need to significantly increase the delivery of new affordable homes in all London boroughs.**

Borough Housing Need

Objectively Assessed Need

- 4.4 Barnet has the largest population of any London borough, which is expected to grow significantly over the next 10-15 years.
- 4.5 The 2015 Barnet Housing Strategy estimated that 2,735 new homes per annum would be required between 2015 and 2025 to meet objectively assessed housing need. Notwithstanding this, the current London Plan (2016) sets Barnet a minimum housing target of 2,349 homes per annum. This target does not however seek to meet objectively assessed need in full due to previously estimated and availability constraints.
- 4.6 The Draft London Plan (2018) proposes to increase Barnet's target by 33% to 3,134 homes per annum based on a more up-to-date assessments of both housing need and land availability carried out by the GLA in 2017. The National Planning Policy Framework (2019) standard methodology for assessing objectively assessed housing need sets Barnet a Housing Target of 4,126 homes per annum.
- 4.7 **This evidences that housing need is increasing and, as a consequence, there is a significant need for Barnet to exceed the minimum target contained within the current London Plan (2016) in order to meet its objectively assessed housing need.**

Historic Delivery

- 4.8 Table 2 below sets out the level of housing completions when benchmarked against the targets outlined above from 2014/15-2016/17. It demonstrates Barnet has only delivered c.43-76% of housing needs (subject to the measure selected). The table is therefore clear that if the Council's past trends in housing delivery continue the authority will fail to meet its objectively assessed need for housing.

Table 2: Housing Delivery (London Plan AMR)

| | 2014/15 | 2015/16 | 2016/17 | Total |
|--------------------------------|---------|---------|---------|-------|
| Net Housing Delivery | 1,282 | 1,785 | 2,251 | 5,318 |
| London Plan (2016) | 2,255 | 2,349 | 2,349 | 6,953 |
| Housing Delivery (%) | 57% | 76% | 96% | 76% |
| Barnet Housing Strategy (2015) | 2,735 | 2,735 | 2,735 | 8,205 |

| | | | | |
|--------------------------|-------|-------|-------|--------|
| Housing Delivery (%) | 47% | 65% | 82% | 65% |
| Draft London Plan (2018) | 3,134 | 3,134 | 3,134 | 9,402 |
| Housing Delivery (%) | 41% | 57% | 72% | 57% |
| NPPF | 4,126 | 4,126 | 4,126 | 12,378 |
| Housing Delivery (%) | 31% | 43% | 55% | 43% |

4.9 This further demonstrates that there is a significant need to increase the delivery of housing of all types and tenures in the borough.

Housing Trajectory

4.10 The most recent housing trajectory for Barnet is set out in the Barnet Annual Monitoring Report (2016/17). It projects the delivery of 14,545 dwellings between 2017/18 and 2021/22, as set out in Table 3 below. This equates to 2,909 dwellings per annum.

Table 3: Potential Pipeline

| | 17/18 | 18/19 | 19/20 | 20/21 | 21/22 | Total |
|----------------|--------------|--------------|--------------|--------------|--------------|---------------|
| Consent | 1,377 | 2,334 | 2,016 | 1,486 | 1,523 | 8,736 |
| Allocation | 29 | 102 | 358 | 431 | 370 | 1,290 |
| Prior Approval | 159 | 384 | 220 | 65 | 0 | 828 |
| Other | 625 | 761 | 884 | 783 | 638 | 3,691 |
| Total | 2,190 | 3,581 | 3,478 | 2,765 | 2,531 | 14,545 |

4.11 It is therefore clear that even if the Council meets these projections, there is unlikely to be sufficient housing supply to meet the level of objectively assessed need identified in the Barnet Housing Strategy (2015) and/or the Draft London Plan (2018).

4.12 Furthermore, if the trajectory is adjusted to take into account of the historic ratio of approvals to delivery (48% as illustrated in Table 4 below) then only 1,396 dwellings per annum will be delivered. This is significantly below the minimum housing need identified in Barnet's Housing Needs Assessment (2015) and the emerging Draft London Plan (2018).

Table 4: Historic Delivery Ratio (London Plan AMR)

| Year | Net Approvals | Net Delivery | % of Approvals |
|--------------|---------------|--------------|----------------|
| 2016/2017 | 3,356 | 2,269 | 67% |
| 2015/2016 | 5,948 | 1,827 | 31% |
| 2014/2015 | 1,948 | 1,327 | 68% |
| Total | 11,252 | 5,423 | 48% |

4.13 This demonstrates that a significant increase in the number of approvals and/or an improvement in the deliverability of projects will be required to ensure Barnet meets its objectively assessed housing need.

Five Year Housing Supply

4.14 The Council's most recent AMR (2016/17) provides an assessment of five year housing supply. It assumes the current minimum London Plan target and a 20% buffer in line with the requirements of national planning policy where there has been a persistent under supply of housing. It shows that if

100% of the trajectory is achieved there would only be a 1% (161 unit) surplus against the Council's five year supply target. As set out above, based on historic delivery rates (48% of approvals) it is considered extremely unlikely that 100% of consents will be delivered. Furthermore, the revised NPPF (2018) now confirms that allocated sites should only be included within the supply figures where there is clear evidence completions will begin on site within 5 years (e.g. pending planning applications).

- 4.15 On this basis, it is considered highly unlikely that the Council can demonstrate a robust five year housing land supply. Consequently, paragraph 11 of the NPPF (2018) should be engaged and the so called 'tilted balance' in favour of approving sustainable development be applied in assessing the housing proposals and making the overall planning balance.
- 4.16 The results of central government's new Housing Delivery Test were published on the 19th February 2019. The results show that Barnet is presently failing the test having only delivered 82% of their delivery test requirement. This means the Council are required to maintain a 20% buffer in housing supply.
- 4.17 **This demonstrates that there is a significant need for Barnet to approve the delivery of more homes in order to establish a five year housing land supply and to meet the housing delivery test.**

Affordable Housing Delivery

- 4.18 The Barnet Strategic Housing Market Assessment ('SHMA') identifies an Objectively Assessed Affordable Housing Need ('OAN') of 1,429 homes per annum. It also confirms the majority of need (71%) is for a range of intermediate products. Table 5 compares the net additional Affordable Housing delivery in the 3 years between 2014/15 to 2016/17 to the 2015 Barnet Housing Strategy target. It shows delivery has only been 24% of objectively assessed need.

Table 5: Net Additional Affordable Housing Delivery (London Plan AMR)

| Total Completions | 2014/15 | 2015/16 | 2016/17 | Total |
|---------------------------------|----------------|----------------|----------------|--------------|
| Net Affordable Delivery | 344 | 205 | 470 | 1,019 |
| Barnet Housing Strategy (2015) | 1,429 | 1,429 | 1,429 | 4,287 |
| Affordable Housing Delivery (%) | 24% | 14% | 33% | 24% |

- 4.19 **This demonstrates that there is a significant need to increase the delivery of Affordable Housing and, in particular, a range of intermediate products.**

Emerging Housing Need

- 4.20 Since Barnet's last full assessment of local housing need in 2015, Local Affordability issues have increased sharply due to the chronic under supply of new housing. In 2017 the lower quartile house price had risen to c.16x the lower quartile income. This compares to a London ratio of c.13x and a national ratio of c.7x (ONS 2018).
- 4.21 These high house prices relative to earnings (and the need for high equity deposits) have resulted in an increase in the number of households who are unable to afford to buy or rent good quality existing private housing but who are also highly unlikely to allocated Social /Affordable Rent housing from the Council's housing waiting list. These households typically comprise first time buyers, key frontline workers (e.g teachers and nurses) and young working households.

- 4.22 The lack housing options within the borough means households who are unable to afford good quality private housing are commonly forced to:-
- I. leave the area (which has implications on the ability of local businesses/front line services to attract and retain staff); or
 - II. live in sub-standard shared accommodation within the private rented sector.

- 4.23 **The above analysis demonstrates that there is a significant need to increase the delivery of a range of affordable housing tenures to meet emerging housing need.**

Local Housing Need

- 4.24 The Application is located within the Mill Hill Ward. The ward is dominated by owner occupied housing and has less than 1% intermediate housing.
- 4.25 Increasing numbers of people are either choosing to live in the Private Rented Sector, due to changing lifestyles and/or affordability constraints. During 2001 and 2011 census the total number of households living in the Private Rented Sector in the Mill Hill ward increased by c.88% and is projected to increase by a further c.30% between 2011 and 2021. This points towards significant growing demand for rental properties in the area.
- 4.26 The ward's existing rental stock is insufficient to meet demand and is also dominated by small scale landlords making it difficult to ensure consistent quality. The lack of supply and quality has resulted in a Buy-to-Let dominated sector which is largely:-
- I. Poor quality (30% of buy to let homes commonly failing decent homes standards);
 - II. Badly managed or maintained housing by absent landlords;
 - III. Overcrowded with 3 or more unrelated individuals sharing with a single bathroom;
 - IV. Offered with unfair tenancy terms including large fees, service charges and sharp annual rental increases;
 - V. Unaffordable (due to upward supply pressure on rents) resulting in a loss of the demographic that supports local businesses and key front line services
- 4.27 The lack of supply of affordable rental options has also resulted in growing numbers of overcrowded households, concealed households (2 or more households living in a single property) and homeless households (many of whom have been forced to live in expensive temporary accommodation).
- 4.28 **The above analysis demonstrates that there is a significant need to increase the delivery of a range of housing tenures, including high quality Rental housing, to meet local ward level housing need and to provide a more mixed and balanced community.**
- 4.29 The public consultation events identified a number of local employers were concerned that the affordability of housing was a key barrier to attracting and retaining staff.
- 4.30 Respondents included the accommodation officer of the Royal Free London NHS Foundation Trust, who identified that c.300 staff were in need of a discounted rental product.
- 4.31 **This demonstrates that there is a significant need to increase the delivery of housing which is affordable and accessible to local workers including the large number of local key front line workers (e.g teachers and nurses).**

5 HOUSING PROPSAL ASSESSMENT

- 5.1 This section of the Statement provides an overview of the proposed approach to housing delivery alongside an analysis of the proposals against the Development Plan and other material considerations set out within Sections 2 to 5 of this Statement.

Housing Amount

- 5.2 The application seeks permission to create a total of 844 new high quality homes (as confirmed in Table 6 below).

Table 6: Land Use Mix

| Land Use | Amount |
|---|-----------|
| Residential | 844 Homes |
| Class C3 Ancillary Build-to-Rent Facilities | 894 SQM |
| Class A1 Retail | 405 SQM |
| Class A3/ A4 Food | 326 SQM |
| Class D1 Community | 297 SQM |

- 5.3 The overall quantum of housing proposed is appropriate having regard to the following factors:-

- **Effective Land Use:** The proposed quantum of housing will optimise the use of an underutilised brownfield site in accordance with the chapter 11 of the NPPF (2018), Policies CS3 and CS4 of the Barnet Core Strategy (2012), Policy 3.3 of the adopted London Plan (2016) and Policy D6 of the Draft London Plan (2019). This will reduce pressure on the release of green belt land.
- **Strategic Housing Need:** The proposed quantum of housing equate to c.3% of the borough's 10-year London Plan target. In the context of the Council's underperformance, and London's overall housing need, the proposed development would significantly contribute towards the London Plan targets.
- **Local Housing Need:** The new homes will make an important contribution towards meeting the Council's objectively assessed need for new housing as identified in the Barnet Housing Strategy (2015). It will also contribute to meeting the Council's annual housing target (which is due to increase by c.33% when the new London Plan is adopted) in accordance with the Barnet Local Plan (2012), Policy 3.3 of the adopted London Plan (2016) and Policy H1 (increasing Housing Supply) of the Draft London Plan (2018).

Housing Types

- 5.4 It is proposed that the scheme will provide a mix of Conventional Sale and Build-to-Rent housing (as confirmed in Table 7 below).

Table 7: Type Mix

| Housing Tenure | Units | % |
|-------------------|------------|-------------|
| Build-to-Rent | 458 | 54% |
| Conventional Sale | 386 | 46% |
| Total | 844 | 100% |

- 5.5 The Build-to-Rent housing will be covenanted in the S106 Planning Agreement for rental use only for a period of no less than 15 years and is intended to be owned and managed by Meadow Residential. Meadow's management team has over 50 years of collective real estate experience in some of the largest cities in the world, including New York City, London, Washington D.C., and Paris.
- 5.6 The proposed Build-to-Rent tenancy terms are set out in the table below.

Table 8: Tenancy Terms

| Tenancy Criteria | Term |
|------------------------|--|
| Lease Length/ Type | 1-5 Year AST with 2 Month Tenant Only Break |
| Rent Certainty | Rents for each year of a fixed term tenancy will be agreed at the start of the term. |
| Tenants Right to Renew | Tenants will always have the automatic right to renew. |

- 5.7 The proposed mix of housing types is appropriate having regard to the following factors:-
- **Housing Choice & Diversity:** The delivery of high quality Build-to-Rent housing will provide a range of benefits, many of which are recognised in Policy H13 (Build-to-Rent) of the Draft London Plan, including but not limited to:
 - **Affordability & Flexibility:** Build-to-Rent doesn't require access to a large equity deposit or mortgage and has 2 month tenant only break option. It is therefore inherently more affordable and flexible than private sale. Increased rental supply will also help to ease upwards pressure on market rents and house prices.
 - **Quality & Security:** Build-to-Rent provides high quality housing which is professionally managed with on-site maintenance support. It is also offered with longer, fairer and more secure tenancy terms including fixed term rents and the automatic right to renew.
 - **Deliverability & Speed:** Build-to-Rent can be forward funded by institutional investment. This increases overall certainty of delivery. Built-to-Rent isn't constrained by sales absorption rates and can be delivered quickly to meet local housing need in the short/ medium term.
 - **Occupancy:** High occupancy levels also mean homes don't sit empty (or partially occupied) as investments and can help to ease overcrowding and upward pressure on market rents.
 - **Economic Growth:** Build-to-Rent provides both direct (management) and indirect (maintenance supply chains) employment opportunities. It also provides housing options for the local work force (supporting local businesses and increasing local spend) and for front line key workers including teachers and nurses.
 - **Long Term Investment:** Build-to-Rent has to compete with other rental products on the market. The owners are therefore incentivised to invest in a high quality longer lasting specification and long term investment in place making and maintenance of the surrounding public realm.
 - **Improving Affordability:** Delivery of new conventional sale homes will help to meet objectively assessed housing need and to reduce upwards pressure on house prices, improving affordability in the medium to long term.

Housing Tenures

- 5.8 It is proposed that 41% of the homes be provided as on-site affordable housing and will be retained as affordable housing in perpetuity (as confirmed in Table 9 below). A viability assessment has not been prepared in accordance with Policy DM10 of Barnet Local Plan (2012 and Policy H6 (Threshold Approach) of the Draft London Plan (2018).

Table 9: Tenure Mix

| Housing Tenure | Units | % |
|--------------------|------------|-------------|
| Affordable Housing | 345 | 41% |
| Private Rent | 270 | 32% |
| Private Sale | 229 | 27% |
| Total | 844 | 100% |

- 5.9 The proposed mix of tenures is appropriate having regard to the following factors:-
- **Strategic Policy:** The scheme exceeds the 35% level of Affordable Housing required by Policy H6 (Threshold Approach) of the Draft London Plan (2018). This also means a viability assessment and late stage review mechanism is not required.
 - **Local Policy:** The scheme exceeds the local level of Affordable Housing in accordance with Policy DM10 of the Barnet Development Management Policies (2012) and the Policy 3.12 of the adopted London Plan (2016).
 - **Strategic Housing Need:** The provision of 345 new affordable homes is equivalent to c.2% of London's total annual affordable housing need, which, when considered in context, is significant on a singular site.
 - **Local Housing Need:** The provision of 345 new affordable homes will contribute to meeting the Council's objectively assessed need for affordable housing of which only 22% was met between 2012 and 2017.
 - **Grant Review:** The inclusion of a grant mechanism (as detailed in the Mayors Affordable Housing Programme) will enable the quantum of Affordable Housing proposed to increase up to 45% if GLA grant is available (subject to funding availability and delivery timescales).
 - **Viability Review:** The financial viability appraisal agreed with Barnet Council demonstrates the scheme is significantly overproviding affordable housing. The inclusion of an Early Review Mechanism (as detailed in the Mayors Affordable Housing SPG) will however enable the quantum of Affordable Housing proposed to increase up to 50% in a compliant tenure mix (subject to future viability and delivery timescales).

Housing Product Mix

- 5.10 It is proposed that the Build-to-Rent element (54%) of the scheme will provide 41% Affordable Housing of which 70% will be genuinely affordable Discounted Market Rent (DMR) and 30% will be London Living Rent (LLR).
- 5.11 The Conventional Sale element (46%) of the scheme will provide 41% Affordable Housing of which 60% will be London Affordable Rent and 40% London Shared Ownership. The exact split by unit is set out in Table 10, and by habitable room in Table 11.

Table 10: Product Mix by Unit

| Type | Units | % | Tenure | Units | % | Product | Units | % |
|-------------------|-------|------|------------|-------|-----|-------------------------------|-------|-----|
| Build-to-Rent | 458 | 54% | Private | 270 | 59% | Private Rent (PR) | 270 | - |
| | | | Affordable | 188 | 41% | Discounted Market Rent (DMR) | 131 | 70% |
| | | | | | | London Living Rent (LLR) | 57 | 30% |
| Conventional Sale | 386 | 46% | Private | 229 | 59% | Private Sale (PS) | 229 | - |
| | | | Affordable | 157 | 41% | London Affordable Rent (LAR) | 94 | 60% |
| | | | | | | London Shared Ownership (LSO) | 63 | 40% |
| Total | 844 | 100% | - | 844 | - | - | 844 | - |

Table 11: Product Mix by Habitable Room

| Type | Hab Room | % | Tenure | Hab Room | % | Product | Hab Room | % |
|-------------------|----------|------|------------|----------|-----|-------------------------------|----------|-----|
| Build-to-Rent | 1,724 | 54% | Private | 1,019 | 59% | Private Rent (PR) | 1,019 | - |
| | | | Affordable | 705 | 41% | Discounted Market Rent (DMR) | 492 | 70% |
| | | | | | | London Living Rent (LLR) | 213 | 30% |
| Conventional Sale | 1,486 | 46% | Private | 879 | 59% | Private Sale (PS) | 879 | - |
| | | | Affordable | 607 | 41% | London Affordable Rent (LAR) | 375 | 62% |
| | | | | | | London Shared Ownership (LSO) | 232 | 38% |
| Total | 3,210 | 100% | - | 3,210 | - | - | 3,210 | - |

5.12 The proposed product mix is appropriate having regard to the following factors:-

- **Strategic Policy:** The product mix is compliant with Policy H7 (Affordable Housing Tenure) and H13 (Build to Rent) of the Revised Draft London Plan (2018).
- **Local Housing Need:** The affordable housing products proposed will ensure a broad range of local housing need can be met. The intermediate products will provide housing for the growing number of households who are unlikely to be eligible for Affordable Rented Housing but who are unable to access private sale housing due to large deposit and mortgage repayment requirements (i.e key workers and/or first time buyers). This is supported by the Barnet Housing Strategy (2015) which identifies 71% of Affordable Housing need is for intermediate tenures.

- **London Affordable Rent:** For priority needs households who are either fully or partly reliant on housing benefits for their income.
 - **London Living Rent:** For households that earn the local average income but cannot afford to save to buy a home in the future.
 - **Discounted Market Rent:** For households that cannot afford to buy or rent a good quality home and who want the flexibility of renting.
 - **London Shared Ownership:** For households that cannot afford to buy a good quality home due to deposit and mortgage requirements, but have sufficient deposit (2.5%) for a Shared Ownership Home.
 - **Private Rent:** For households that want the flexibility of renting, or cannot afford to buy a good quality home or Shared Ownership home, who presently have limited options for good quality/ secure rental housing within the Buy-to-Let sector.
 - **Private Sale:** For households that can afford to buy privately. The governments help to buy scheme has been extended to 2022 for first time buyers (improving affordability).
- **Mixed Balanced Community:** The provision of new a range housing types and tenures will assist in creating a more mixed and balanced community. This is supported by Policy 3.12 of the adopted London Plan (2016).

Housing Management

5.13 It is proposed that the housing products be distributed across the site as set out in the Table 12 below. The distribution of products within the Build-to-Rent element of the scheme is indicative only.

Table 12: Housing Distribution

| Building | Build-to-Rent | | | Conventional | | | Total |
|----------|---------------|----------------------|--------------------|--------------|------------------------|-------------------------|-------|
| | Private Rent | Discount Market Rent | London Living Rent | Private Sale | London Affordable Rent | London Shared Ownership | |
| A | 43 | 23 | 9 | 0 | 0 | 0 | 75 |
| B | 0 | 0 | 0 | 45 | 0 | 9 | 54 |
| C | 29 | 14 | 6 | 0 | 0 | 0 | 49 |
| D | 0 | 0 | 0 | 70 | 0 | 0 | 70 |
| E | 23 | 11 | 5 | 0 | 0 | 0 | 39 |
| F | 0 | 0 | 0 | 62 | 0 | 0 | 62 |
| G | 21 | 10 | 5 | 0 | 0 | 0 | 36 |
| H | 0 | 0 | 0 | 52 | 0 | 0 | 52 |
| I | 18 | 8 | 4 | 0 | 0 | 0 | 30 |
| J | 25 | 12 | 5 | 0 | 0 | 0 | 42 |
| K | 30 | 14 | 6 | 0 | 0 | 0 | 50 |
| L | 38 | 18 | 8 | 0 | 0 | 0 | 64 |
| M | 28 | 13 | 6 | 0 | 0 | 0 | 47 |
| N | 0 | 0 | 0 | 0 | 34 | 0 | 34 |
| O | 0 | 0 | 0 | 0 | 29 | 0 | 29 |
| P | 15 | 8 | 3 | 0 | 0 | 0 | 26 |
| Q | 0 | 0 | 0 | 0 | 0 | 54 | 54 |
| R | 0 | 0 | 0 | 0 | 31 | 0 | 31 |
| Total | 270 | 131 | 57 | 229 | 94 | 63 | 844 |

5.14 The proposed distribution of products is appropriate having regard to the following factors:-

- **Equality:** The Build-to-Rent products (Private Rent, DMR and Living Rent) will be managed together under single ownership allowing the affordable tenures to be pepper potted throughout the buildings. This will support social cohesion and ensures everyone has the same management quality (i.e 'no poor doors').
- **Feasibility:** The need to accommodate separate servicing and management arrangements for Registered Providers means it would only be practically feasible to provide Affordable Rented accommodation where this comprises an entire building. It is also not practically feasible to include any Affordable Rent or ownership products within the Build-to-Rent element of the scheme (due to management efficiency and service charge constraints). All homes will however be designed to be tenure blind.

Housing Affordability & Eligibility

5.15 It is proposed that the product terms be set as detailed in Table 13 below.

Table 13: Product Affordability & Eligibility

| Product | Product Terms | Estimated Household Income* | | | Product Eligibility |
|-------------------------|--|---|-----------|-----------|--|
| | | 1 Bed | 2 Bed | 3 Bed | |
| London Shared Ownership | Minimum 25% Equity Share Up to 2.75% Rent | c.£42,500 | c.£59,500 | c.£72,500 | Homes for London. Priority for those who live borough and key front line workers. Maximum Income £90k. |
| Discounted Market Rent | 65%-75% of Open Market Rent | c.£39,000 | c.£47,000 | c.£49,000 | Homes for London. Priority for those who live borough and key front line workers. Maximum Income £60k. |
| London Living Rent | 50%-65% of Open Market Rent. GLA prescribed rents. | c.£33,500 | c.£37,500 | c.£41,000 | |
| London Affordable Rent | 35% – 45% of Open Market Rents. GLA prescribed rents. | c.£0 - £35,000 No minimum Income. Households may be fully or partly reliant on housing benefits. | | | Barnet Housing List. Needs based eligibility determined by Barnet. |

* Based on housing costs being no more than 1/3 of gross household income (Shared Ownership mortgage assumes 2.5% deposit and a 5% interest rate). Paragraph 4.24 of the Mayor's Housing Strategy (May 2018) confirms this is a widely accepted measure of housing affordability.

5.16 The proposed products terms, affordability and eligibility is appropriate having regard to the following factors:-

- **Affordability:** The proposed product terms will ensure the homes are genuinely affordable to a broad range of household incomes in accordance with the Mayor's housing strategy. Many of the households provided for would otherwise be unable to afford to buy or rent a good quality home locally.
- **Eligibility:** Eligibility for LAR will be determined by Barnet Council. The Intermediate homes will be made available through the Mayors homes for London portal to households with incomes up to £60,000 (Intermediate Rental Products) or £90,000 (London Shared Ownership).
- **Priority:** The Build-to-Rent products (Private Rent, DMR and LLR) will be prioritised to front line key workers (teachers, nurses etc) who presently have limited housing options. For example, A 1 bedroom LLR home could be made available for a single primary school teacher earning the

London average of c.£40,000 or a 3 bedroom DMR home could be provided to a full time fire officer (£36,500) and a part time nurse (£19,000) earning c.£55,000 combined (ASHE 2018).

Housing Service Charges

5.17 The estimated services charges for the scheme are set out in Table 14 below.

Table 14: Estimated Service Charges

| Type | Estimated Service Charge |
|-----------------|--------------------------|
| 1 Bed Apartment | £35 Per Week |
| 2 Bed Apartment | £45 Per Week |
| 3 Bed Apartment | £55 Per Week |

5.18 The estimated service charge is appropriate having regard to the following factors:-

- **Affordability:** The rents charged for the Build-to-Rent products (Private Rent, DMR and LLR) are inclusive of service charges. The scheme has been designed to ensure the service charges applicable to the LAR and LSO homes are as affordable as possible.
- **Equality:** The service charges for the Affordable housing products are the minimum that can be charged (noting that the private tenures cannot legally cross subsidise the affordable tenures. All residents will however have the right to access on-site amenities, subject to an additional optional charge. This will promote social cohesion and equality.

Housing Design

5.19 The proposed minimum and average apartment's sizes are set out in Table 15 below.

Table 15: Private Unit Size Mix

| Type | Minimum size (SQM) | Average Size (SMQ) | +/- (SQM) |
|----------------|--------------------|--------------------|-----------|
| Studio | 37 | 41 | +4 |
| 1 Bed 2 Person | 50 | 53 | +3 |
| 2 Bed 3 Person | 61 | 61 | - |
| 2 Bed 4 Person | 70 | 78 | +8 |
| 3 Bed 4 Person | 74 | 105 | +31 |
| 3 Bed 5 Person | 86 | 86 | +0 |
| 3 Bed 6 Person | 95 | 105 | +10 |

5.20 All homes have been designed so that they are tenure blind and meet or exceed the design standards set out in the Development Plan and Draft London Plan (2018), including the provision of more 10% wheelchair accessible homes. The design of the proposed homes is therefore appropriate.

Housing Size Mix

5.21 The proposed unit mix is set out in Table 16 below.

Table 16: Private Unit Size Mix

| Type | No. | % |
|-----------------|------------|-------------|
| Studio | 4 | <1% |
| 1 Bed apartment | 281 | 33% |
| 2 Bed apartment | 437 | 52% |
| 3 Bed apartment | 122 | 15% |
| Total | 844 | 100% |

5.22 The proposed mix of private unit sizes is appropriate having regard to site specific factors including:-

- **Strategic Policy:** The proposed mix is supported by Policy H12 of the Draft London Plan (2018) which recognises the need for smaller unit types.
- **Housing Need:** The Draft London Plan recognises there is growing need for smaller more affordable products for both newly forming and concealed households who are unable to access private sale housing due to large equity deposit and mortgage repayment requirements (e.g first time buyers and key frontline worker households).
- **Demand & Affordability:** There is limited demand for larger Build-to-Rent homes. It is also difficult for larger Shared Ownership units to be made meaningfully affordable to local households due to the minimum equity share requirement (25%).

Affordable housing comparison

5.23 Table 17 compares the previously refused application and GLA Stage 3 scheme affordable housing offer. This demonstrates a significantly improved affordable housing offer in terms of quantum, tenure, key worker priority and Build to Rent covenants, recognising the scheme is now considered to be Fast Track Compliant.

Table 17: Affordable Housing Comparison

| Affordable | Barnet Refused Scheme 724 Scheme | GLA Stage 3 Scheme 844 Scheme |
|-----------------------------|-------------------------------------|----------------------------------|
| Overall Affordable Housing | 35% - 253 Units | 41% - 345 Units |
| Discounted Market Rent | 100% - 253 Units | 70% - 131 Units (of BTR) |
| London Living Rent | NIL | 30% - 57 Units (of BTR) |
| London Affordable Rent | NIL | 60% - 94 Units (of Conventional) |
| London Shared Ownership | NIL | 40% - 63 Units (of Conventional) |
| DMR Discount | 80% of OMR | 65% - 75% of OMR |
| Key Worker Priority | No | Yes |
| Build-to-Rent Covenant | - | 15 Year + Clawback |
| Affordable Housing Covenant | - | Perpetuity |
| Early Review Mechanism | - | Yes |
| Fast Track Compliant | No | Yes |

6 OVERALL CONCLUSIONS

- 6.1 This Statement has been prepared on behalf of Meadow Residential in respect of Pentavia Retail Park, Watford Way, Mill Hill, London, NW7 2ET.
- 6.2 A planning application has been submitted for 844 new homes alongside new commercial floorspace, car parking, landscaping and public realm improvements ('the Application'). This application is of strategic importance for housing delivery in both Barnet and London.
- 6.3 The proposals have been subject to extensive pre-application discussions and consultation with the London Borough of Barnet, the GLA, statutory consultees, local stakeholders and members of the public.
- 6.4 Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 6.5 This Housing Proposals Assessment contained within this Statement demonstrates that the housing proposals are appropriate for the site and proposed development in accordance with the statutory Development Plan and other material planning considerations.
- 6.6 The provision of 844 new homes, including 345 new affordable homes, should therefore be afforded significant positive decision making weight in the determination of this planning application.