

Former Holloway Prison

BBPVAFO

Affordable Housing Statement

**Former Holloway Prison, Parkhurst Road, London N7
0NU**

November 2021

1. Introduction

1.1 This Affordable Housing Statement has been prepared on behalf of Peabody Construction Limited ('Peabody') ('the Applicant') in support of a Full Planning Application for redevelopment of land known as the Former Holloway Prison, Parkhurst Road, London, N7 0NU ('the Site'). The Site is located within the London Borough of Islington ('LBI').

1.2 The full description of the proposed development ('the development') is:

'Phased comprehensive redevelopment including demolition of existing structures; site preparation and enabling works; and the construction of 985 residential homes including 60 extra care homes (Use Class C3), a Women's Building (Use Class F.2) and flexible commercial floorspace (Use Class E) in buildings of up to 14 storeys in height; highways/access works; landscaping; pedestrian and cycle connections, publicly accessible park; car (blue badge) and cycle parking; and other associated works.'

1.3 This Statement should be read in conjunction with the Planning Statement, prepared by Avison Young, and the Accommodation Schedules, prepared by AHMM.

2. Affordable Housing

Overall Affordable Housing Provision

- 2.1 London Plan Policy H4 sets a strategic target for 50% of all new homes that are delivered across London to be genuinely affordable. For public sector land the requirement is 50% to be delivered on each site.
- 2.2 London Plan Policy H5 states the following criteria must be met in order for a development to follow the Fast Track Route:
- meet or exceed the relevant threshold level of affordable housing on site without public subsidy
 - be consistent with the relevant tenure split (see Policy H6 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 H4 Delivering affordable housing and have sought grant to increase the level of affordable housing
- 2.3 Supporting text to the Policy at Paragraph 3.9.2 states that where there is an agreement with the Mayor to deliver at least 50 per cent across the portfolio of sites, then the 35 per cent threshold should apply to individual sites. Peabody has entered into a Strategic Partnership Agreement with the GLA and therefore the 35% threshold applies to the Site.
- 2.4 London Plan Policy H6 specifies a tenure split of 30% low cost rent (incl. social rent), 30% intermediate (incl. London Shared Ownership), and 40% to be determined by the borough as low-cost rented homes or intermediate products.
- 2.5 Core Strategy Policy CS12 Part G requires 50% of additional housing to be built in the borough over the plan period to be affordable. The Policy requires a tenure split of 70% social housing and 30% intermediate housing.
- 2.6 Draft Local Plan Policy H3 Part D requires sites which are currently or have been in public sector ownership to provide 50% affordable housing without public subsidy and exhaust all potential options for maximising the delivery of on-site affordable housing in excess of 50%, particularly through securing relevant public subsidy. Draft Local Plan Policy H3 Part H requires an affordable housing tenure split of 70% social rented housing and 30% intermediate housing. The majority of intermediate units should

(our emphasis) be London Living Rent, and regard will be given to the priorities set out in the Council's Housing Strategy and other agreed evidence of housing need.

2.7 The Site is public sector land given its previous use as a prison operated on behalf of the Ministry of Justice.

2.8 The development provides 60% affordable housing (by unit) with a tenure split of 70% social rent, with rent levels set at Target Rent, and 30% London Shared Ownership, as follows:

Affordable Provision by Unit		
	Units	Percentage (%)
Affordable, comprising:	593	60%
<i>Social rent</i>	415 (70%)	
<i>London Shared Ownership</i>	178 (30%)	
Market	392	40%
Total	985	100%

Table 1: Affordable Housing Provision By Unit

2.9 The development provides 60% affordable housing (by unit). The first 50% is provided without grant. The Applicant has sought to maximise affordable housing beyond the minimum required amount of 50% and provides the additional 10% affordable housing utilising grant. This results in a total offer of 60% affordable housing. The affordable housing provision is compliant with London Plan Policy H4, H5 and H6, Core Strategy Policy CS12 and Draft Local Plan Policy H3. The development is eligible for the Fast Track Route. Nevertheless, LBI has requested the Applicant submit a Viability Assessment. In accordance with this request a Viability Assessment is submitted and the Applicant is happy for this to be made publicly available alongside the other application documents.

2.10 When measured by habitable room the development provides 62% affordable housing with a tenure split of 75% social rent, with rent levels set at Target Rent, and 25% London Shared Ownership, as follows:

Affordable Provision by Habitable Room		
	Habitable Room	Percentage (%)
Affordable, comprising:	1784	62%
<i>Social rent</i>	1346 (75%)	
<i>London Shared Ownership</i>	438 (25%)	
Market	1116	38%

Total	2900	100%
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Table 2: Affordable Housing Provision By Habitable Room

2.11 All of the affordable housing will be delivered on-site.

Tenure

2.12 The development provides 60% affordable housing (by unit) with a tenure split of 70% social rent and 30% London Shared Ownership.

2.13 The social rent units will have the rent levels set at Target Rent. This will be secured by way of S106 obligation.

2.14 The London Shared Ownership units will be subject to the maximum annual household income cap as set by the GLA in the London Plan (2021) and updated in line with the London Plan Annual Monitoring Report. The current annual household income cap is £90,000.

2.15 Service charges for the social rent units and London Shared Ownership are charged in addition.

Affordable Housing Mix

2.16 London Plan Policy H10 sets out that developments should generally consist of a range of sizes having regard to a number of characteristics. The London Plan does not set a prescriptive mix that developments are required to follow.

2.17 Core Strategy Policy CS12 requires a range of unit sizes within each housing proposal, whilst maximising the proportion of family accommodation in both affordable and market housing.

2.18 Development Management Policies DPD Policy DM3.1 states that all sites should provide a good mix of housing sizes, noting the housing mix required on all residential developments will be based on Islington's Local Housing Needs Assessment, and the requirements of any updated housing needs surveys and/or assessments prepared by or on behalf of the Council. The supporting text to this Policy included a table setting out the housing mix required for each housing tenure, as follows:

Tenure	1-bed	2-bed	3-bed	4-bed or more	Total
Market	10%	75%	15%	0%	100%
Intermediate	65%	35%	0%	0%	100%
Social Rented	0%	20%	30%	50%	100%

Figure 1: Extract of Development Management Policies DPD Table 3.1

2.19 The Holloway Prison Site SPD does not set a prescriptive mix, with Paragraph 4.12 stating:

‘Developments are required to provide a mix of units across different tenures. The exact mix of units should be confirmed in discussions with the council at planning stage. However, the size of the site would lend itself well to the provision of a genuine mix of unit sizes, including a significant proportion of family accommodation of 3 bedrooms or more.’

2.20 The emerging site allocation in the Draft Site Allocations (2019, as modified 2021) does not set a prescriptive mix.

2.21 Draft Local Plan Policy H2 states all development proposals must provide a good mix of unit sizes which contributes to meeting the housing size mix priorities set out in Table 3.2. The housing mix priorities are set out as ‘none’, ‘low’, ‘medium’ and ‘high’. Draft Local Plan Policy H2 does not define ‘low’, ‘medium’ and ‘high’.

Tenure	Studio/bedsit	1-bed	2-bed	3-bed	4-bed
Social rented	None	Low/Medium	High	Medium	Low
Intermediate rent – at London Living Rent levels (or rents akin to social rent)	None	Medium	High	Medium	Low
Intermediate rent – other Discounted Market Rent products	None	High	Medium	None	None
Intermediate – shared ownership	None	High	Medium	None	None
Market	None	Low	High	Medium	Low

Figure 2: Extract of Draft Local Plan Table 3.2

2.22 Given the Draft Local Plan is supported by a suite of evidence base documents which include assessments on housing need, in accordance with Development Management Policies DPD this is considered to be of greater relevancy than the mix set out in Table 3.1 above. Therefore development has sought to provide a mix that responds to Draft Local Plan Table 3.2, which is based on the latest housing need evidence. The development also responds to advice from the LBI’s Housing Team regarding the social rent mix that the greatest need is for 2 and 3 bedroom social rent accommodation.

2.23 The housing mix within the development is summarised in Table 3 below:

Unit Mix						
	1 bed Extra Care	1 bed	2 bed	3 bed	4 bed	Total
	Unit (%)	Unit (%)	Unit (%)	Unit (%)	Unit (%)	Unit (%)
Social Rent Extra Care	60 (100%)	/	/	/	/	60 (100%)
Social Rent	/	46 (13%)	209 (59%)	87 (24%)	13 (4%)	355 (100%)
London Shared Ownership	/	96 (54%)	82 (46%)	/	/	178 (100%)
Market	/	87 (22%)	278 (71%)	27 (7%)	/	392 (100%)
Total	60	229	569	114	13	985

Table 3: Affordable Housing Unit mix

- 2.24 The social rent provision of 415 units includes 60 Extra Care social rent 1-bedroom homes which meet a specific need, in accordance with Draft Local Plan Policy H7.
- 2.25 The development provides a mix of 1 to 4 bedroom units, including 696 family homes (2+ bedroom as defined in supporting text to Draft Local Plan H2). Of these 696 family homes (2+ bedroom), 391 are within the social rent and London Shared Ownership tenures.
- 2.26 The development is considered to provide an appropriate mix of units taking into account housing need, the characteristics of the development and the proposed tenures, in accordance accord with London Plan Policy H10, Core Strategy Policy CS12, Development Management Policies DPD Policy DM3.1, and Draft Local Plan H2.

Wheelchair Unit Mix

- 2.27 The development provides 12% wheelchair homes (120 units), designed in accordance with Building Regulations Part M4(3). These units are located within each plot. The social rent wheelchair units will be delivered as M4(3)(2)(b) 'wheelchair accessible units'. The London Shared Ownership and market wheelchair units will be delivered as M4(3)(2)(a) 'wheelchair adaptable units'.
- 2.28 The tenure split for the wheelchair homes is as follows:

Wheelchair Unit Mix					
	1 bed	1 bed	2 bed	3 bed	4 bed

	Extra Care				
	Unit	Unit	Unit	Unit	Unit
Social Rent	60	1	10	14	4
London Shared Ownership	/	4	7	/	/
Market	/	3	16	1	/
Total	60	8	33	15	4

Table 4: Wheelchair Unit Mix**Registered Provider**

- 2.29 The applicant is Peabody Construction Limited.
- 2.30 The social rent units will be managed by Peabody Trust, a Registered Provider (registration number 4878) registered with the Regulator of Social Housing.
- 2.31 The London Shared Ownership units will be managed by Peabody Developments Limited, a Registered Provider (registration number L3885) registered with the Regulator of Social Housing.
- 2.32 A Nominations Agreement will be agreed with LBI prior to the units being occupied.

Quality and Design of Residential Units

- 2.33 The London Plan Policy D6 and the Mayor's Housing SPG sets out housing standards for residential development.
- 2.34 Development Management Policies DPD Policy DM3.4 sets out further housing standards that developments are required to meet. This includes standards, such as a requirement for a 2.6m floor to ceiling height, which differ from the standards in the London Plan and Mayor's Housing SPG.
- 2.35 Draft Local Plan Policy H4 sets out housing standards.
- 2.36 The affordable housing proposed has been designed to accord with the relevant standards. Compliance is demonstrated within the Design and Access Statement and within the policy matrices appended to the Planning Statement. As a summary, the following key design standards are met:
- All units meet or exceed the required minimum space standards and storage space standards.

- All units have a floor to ceiling height of 2.6m in accordance with LBI's adopted and draft standard (noting this is a higher requirement than the London Plan and Mayor's Housing SPG).
- All units are served by private amenity space which accords with the size standard in LBI's adopted and draft standard (noting this is a higher requirement than the London Plan and Mayor's Housing SPG).
- Dual aspect accommodation has been maximised.
- 100 of the units, split across social rent and London Shared Ownership, are wheelchair homes designed in accordance with Building Regulations Part M4(3). The remainder are designed in accordance with Building Regulations Part M4(2).
- All units are served by necessary ancillary facilities such as cycle stores, refuse and recycling stores, entrance lobbies and lift/stair cores.

2.37 On this basis, it is considered that the development complies with London Plan Policy D6, Development Management Policies DPD Policy DM3.4 and Draft Local Plan Policy H4.

3. Summary

- 3.1 This Affordable Housing Statement sets out details of the overall level of affordable housing, tenure split, mix, and the quality of the accommodation.
- 3.2 The development provides 60% affordable housing (by unit) (62% by habitable room) on-site. The first 50% is provided without grant. The Applicant has sought to maximise affordable housing beyond the minimum required amount of 50% and provides the additional 10% affordable housing utilising grant. This results in a total offer of 60% affordable housing. The affordable housing provision is compliant with London Plan Policy H4, H5 and H6, Core Strategy Policy CS12 and Draft Local Plan Policy H3. The development is eligible for the Fast Track Route. Nevertheless, LBI has requested the Applicant submit a Viability Assessment. In accordance with this request a Viability Assessment is submitted.
- 3.3 The development is considered to provide an appropriate mix of units taking into account housing need, the characteristics of the development and the proposed tenures, in accordance with London Plan Policy H10, Core Strategy Policy CS12, Development Management Policies DPD Policy DM3.1, and Draft Local Plan H2.
- 3.4 With regard to quality of the accommodation, it is considered that the development complies with London Plan Policy D6, Development Management Policies DPD Policy DM3.4 and Draft Local Plan Policy H4.