



Greggs Bakery / Twickenham

Affordable Housing Statement



Greggs, Twickenham, London, TW2

AFFORDABLE HOUSING STATEMENT

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On behalf of LONDON SQUARE DEVELOPMENTS

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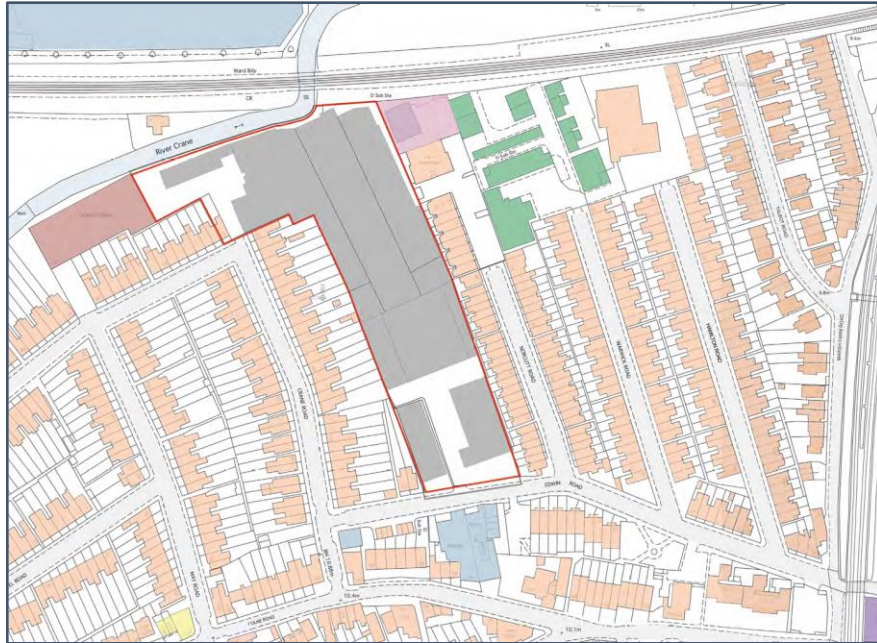
1 INTRODUCTION

- 1.1 This Affordable Housing Statement ('AHS' or 'Statement') has been prepared by DS2 in support of the application for planning permission at the former Greggs Bakery site, Twickenham (hereafter 'the Site'). The Site is located within the London Borough of Richmond Upon Thames (LBRuT).
- 1.2 The planning application seeks permission for the redevelopment of the former Greggs Bakery site for a mix of flexible commercial (B1/B2/B8) and residential-led scheme (C3) uses. The redevelopment of the site will deliver 116 homes, of which there will be 65 apartments and 51 townhouses. It is proposed that 43 (37% by unit and 33% by habitable room) of these homes will be affordable.
- 1.3 The AHS is submitted on behalf of the applicant, London Square Developments Ltd (hereafter referred to as 'the Applicant').
- 1.4 This Statement describes the development proposals and how they respond to the local environment, focusing on the following areas:
 - Explanation of the development proposals
 - National, regional and local planning policy considerations and the development proposal's position within this policy environment
 - Ability and requirement to address affordable housing policy priorities
 - A summary of the methodology and approach used in determining scheme viability
- 1.5 This Statement should be considered alongside the other planning application documents, including but not limited to, the DP9 Planning Statement and the Assael Design and Access Statement.

2 DEVELOPMENT VISION

Location and Existing Use

- 2.1 The site is located in the London Borough of Richmond upon Thames in South West London, within a predominantly residential area. Immediately north of the site is the River Crane, the railway line and a single residential property, and to the south of the site is a car servicing unit. To the east and west of the site are established residential areas and immediately to the north west is 'Crane Mews', a collection of commercial studios, many of which have recently been converted into residential.
- 2.2 In addition, GEMS Twickenham Primary is located in the vicinity. There is a selection of retail and leisure offerings on Twickenham Green.
- 2.3 The site benefits from the potential for dual access from Gould Road/Crane Road and Edwin Road. The site benefits from its proximity to Chertsey Road, which connects it to the southwest and southeast via the M3 and M25. The M4 is located approximately 30 minutes from the site, with Heathrow accessible by road in approximately 25 minutes. Twickenham railway station is located approximately 0.6m east of the site, providing regular services to Waterloo which takes 20-30 minutes.
- 2.4 The current site is almost completely covered in built structures and hard standing. The majority of buildings are large span warehouses with brick or metal walls and metal or tiled roofs. The buildings vary in height between single storey and three storeys and have a mixture of pitched and flat roofs.
- 2.5 No.2 Gould road is also within the application. This is an end of terrace 2-bedroom house with a white render exterior and front and rear gardens. It is in need of some aesthetic repairs but is generally in good condition.
- 2.6 A site location plan is set out below:



Ownership

2.7 The Applicant is in a contractual agreement with the freeholder of the site.

3 DEVELOPMENT PROPOSALS

3.1 The planning application has been submitted by DP9 planning consultants on behalf of the Applicant for the redevelopment of the Site.

3.2 A full assessment of the proposed development at the Site (hereafter ‘the Development’) is contained within the Design and Access Statement prepared by Assael Architecture.

3.3 The description of development is as follows:

“Demolition of existing buildings (with the retention of a single dwelling) and redevelopment of the site to provide 116 residential units and 175 sqm commercial floorspace; landscaped areas; with associated parking and highways works and other works associated with the development.”

3.4 The redevelopment of the site will deliver 116 residential units and commercial floorspace.

3.5 The headline development areas are shown in Table 01 below.

Table 01: Development areas

Use	GIA (sqm)
Residential (Use Class C3)	11,740
Commercial Space	175
Total (excludes ancillary space and plant)	11,915

Residential

3.6 The Development will provide 116 residential units comprising a mix of one to four bed units. The table below indicates the proposed unit mix:

Table 02: Proposed scheme residential Mix

	One Bed	Two Bed	Three Bed	Four Bed	Total	% per Tenure
Market Units	19	19	24	11	73	63%
Affordable Units	13	16	14	0	43	37%
Total Units	32	35	38	11	116	100%

Private Amenity

- 3.7 All of the apartments will benefit from terraces and balconies in line with London Plan amenity space requirements.
- 3.8 Each family house is provided with a rear garden of at least 17 sqm.

Landscaping/Play Space

- 3.9 The proposed scheme will provide a landscaped area designed for both young and older children, adding to the local provision. The play space will be provided along the landscaped garden adjacent to the River Crane. The playspace will utilise the natural assets along the river to create incidental play activities and a beautiful walking path. This area will be furnished with playable logs, stumps, mounds, boulders and playable decks.
- 3.10 The site proposals are for six distinctive landscaped areas, which respond to their immediate context.

Commercial Use

- 3.11 The Development will provide a two-storey commercial unit extending to 175 sqm / 1,884 sq ft (GIA) of flexible B1/B2/B8 commercial space. The commercial building matches the building line of the existing houses, 52 and 54 Edwin Road, and provides defensible space and an active frontage. It is proposed that the commercial space will be brought forward at 50% of market rent, and it therefore considered as affordable commercial space. The proposed space will create around 18 full time jobs which would serve a local need for small businesses. The proposals will provide high quality floorspace which is more appropriate within the residential environment. This is in line with the aspirations of Local Plan Policy LP41 which sets out that new office accommodation should be suitable to meet future needs, especially to provide for the requirements of local businesses and small firms.
- 3.12 The proposed level of commercial floorspace is considered to be commensurate with the location outside of a centre, within an area primarily characterised by residential dwellings.

Car Parking

- 3.13 The scheme provides 117 car parking spaces, including 1 space for the B1 office and 1 space for a car club. This is distributed as follows:
- 29 spaces on a drive way (of which 6 are wheelchair accessible)
 - 16 integrated garage spaces
 - 20 allocated spaces below podium (of which 2 are accessible)
 - 50 allocated surface spaces (of which 4 are accessible)

- 1 commercial space
- 1 car club space on Edwin Road

3.14 All surface and below podium spaces will be allocated to a specific dwelling. Accessible spaces are included within this allocation and are provided in close proximity to the accessible apartments or the accessible house type driveway.

Cycle Parking

3.15 The scheme provides a total of 228 cycle spaces, of which 4 spaces are for short stay visitors and 8 are allocated for the commercial building. The houses have secure cycle storage within garages or in external stores. Apartments have dedicated cycle stores within each building in the form of two-tier cycle racks.

4 PLANNING POLICY AND APPROACH

4.1 The DP9 Planning Statement submitted as part of the Application provides an overall review of the planning policy context in relation to the Development. The following section of this FVA therefore provides a summary review of the key national, regional and local planning policy that guides the delivery of affordable housing and other planning obligations, with reference to the importance of considering financial viability and balancing the requirements of obtaining planning obligations with the risks of non-delivery.

National

National Planning Policy Framework

- 4.2 The NPPF was refreshed as of February 2019. The drive for sustainable development remains at its core. It advises that development proposals that accord with the development plan should be approved without delay, and where there are no relevant development plan policies permission should be granted unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the development. Paragraph 57 of the NPPF suggests that planning applications that comply with the contributions expected from developments are assumed to be viable and that the applicant should demonstrate whether particular circumstances justify the requirement for a viability assessment. Following this sentiment, an FVA has been produced to demonstrate compliance with Local Plan policies.
- 4.3 Councils are advised to consider the housing need of all user groups within their local area and plan accordingly for appropriate accommodation to be delivered. Where there is a need for affordable housing, plans should specify the types required, with the expectation that in normal circumstances these requirements are addressed through the provision of onsite affordable housing, and where it can be robustly justified for contributions to be made via offsite delivery or a contribution in lieu.
- 4.4 If an applicant seeks permission for a development proposal that does not meet the local planning policy requirements on viability grounds, it is the applicant's responsibility to demonstrate this at the application stage.

National Planning Practice Guidance

- 4.5 The National Planning Practice Guidance (NPPG) was finalised in March 2014 and subsequently updated in line with the new NPPF published July 2018. The NPPG, in alignment with the NPPF, contains important guidance on development viability. It provides a more detailed assessment of acceptable practices for the submission of a site-specific viability assessment covering transparency, the standardisation of inputs, and the approach to consideration of the Benchmark Land Value.
- 4.6 At paragraph 013 the NPPG defines land value for the purposes of a viability assessment:

“To define land value for any viability assessment, a benchmark land value should be established on the basis of the existing use value (EUV) of the land, plus a premium for the landowner. The premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to comply with policy requirements. This approach is often called ‘existing use value plus’ (EUV+).”

- 4.7 Paragraph 14 of the NPPG sets out that the factors that should be considered to reach a Benchmark Land Value; this is further discussed in Section 9 of this report. DS2 would note that although the guidance is understood in terms of viability being at plan-making stage it is to be read across to application stage whilst Local Plans catch-up with NPPG standardisation.

Regional Policy

- 4.8 The current London Plan (March 2016) identifies the Mayor’s requirement to maximise affordable housing. Policy requires LPA’s to set an overall target for affordable housing provision within development proposals, taking account of several key criteria, including viability and not prejudicing delivery with a view to encourage rather than restrain development
- 4.9 Policy 3.11 sets a pan-regional target tenure split of 60% social and affordable rent housing and 40% intermediate housing. However, the policy notes that it is for each local authority to identify their own local requirements in relation to tenure split.
- 4.10 Policy 3.12 requires LPAs to seek the maximum reasonable amount of affordable housing when negotiating on individual residential or mixed-use sites, having regard to the following:
- The need to encourage rather than restrain residential development;
 - The need to promote mixed and balanced communities;
 - The size and type of affordable housing needed in particular locations; and
 - The specific circumstances of individual sites.
- 4.11 The Draft London Plan that incorporates minor changes to the December 2017 version was published in August 2018, ahead of the Examination in Public. This is after the proposed scheme herein has been developed and finessed for submission to the Council. As this Draft Plan has not been tested by an Inspector at Examination in Public, the weight that should be attributed to it at this stage is limited.
- 4.12 Policy H5 details the strategic targets for affordable housing delivery across London, setting a target of 50% of all new homes to be affordable. It explains the sequential approach to affordable housing delivery with a preference for onsite delivery, an acknowledgement that

offsite delivery can be appropriate when onsite delivery is not achievable or would deliver better outcomes, or cash in lieu being appropriate in exceptional circumstances.

- 4.13 The 'Threshold Approach' to assessing development schemes is detailed under Policy H6. This explains that schemes that deliver a minimum of 35% affordable housing and meet other relevant policy requirements can follow the Fast Track Route without submitting viability evidence. The Fast Track route is only applicable on applications that meet or exceed 35% affordable housing provision without public subsidy, provide affordable housing on site, meet the specified tenure mix, and meet obligations to the satisfaction of the LPA, and schemes that do not will follow the Viability Tested Route.
- 4.14 In response to national guidance, the London Plan emphasises the need to consider development viability in relation to the proposed development on individual sites and in relation to borough target setting, to ensure that overall development is encouraged rather than restrained.

The Mayor's Affordable Housing and Viability SPG (August 2017)

- 4.15 The Mayor's guidance is a material consideration in the determination of planning applications in London. However, it is also clear that it does not, and cannot, introduce new policy and to the extent it does, such inconsistency needs to be considered carefully and limited weight accorded to it so as to not undermine the adopted London Plan.
- 4.16 The SPG represents the new Mayoral administration's policy objectives in relation to the delivery of new homes, including affordable housing. The overarching objectives of the SPG are clear in seeking to enhance housing and economic opportunities for all persons across the capital. The SPG proposes the following guidance on existing policy:
- The Mayor will treat information submitted as part of, and in support of, a viability assessment transparently. In very exceptional circumstances, there may be legitimate reasons for keeping elements of viability information confidential.
 - To enable the delivery of more affordable homes the Mayor will make funding available to increase the proportion of affordable homes above that which is viable on a nil-grant basis. Funding will be available on a tariff basis, details of which are set out in the Mayor's Homes for Londoners: Affordable Homes Programme 2016-21.
 - The Mayor considers that the Existing Use Value (plus a premium) approach is usually the most appropriate approach to benchmark land value for planning purposes. Alternative approaches will only be considered in exceptional circumstances.

- The SPG provides further guidance on the practical application, methodologies, and approach to site value for viability assessments, which includes the Fast Track approach and specifies a London wide preferred approach to tenure split.

4.17 The SPG acts as guidance to the Local Authority and the Local Plan requirements would take precedence.

Local Policy - Richmond Upon Thames Local Plan (July 2018)

4.18 The local statutory Development Plan for the application site is the newly adopted London Borough of Richmond Upon Thames' Local Plan (July 2018). It notes that the borough's recent housing delivery policy target has been an average of 315 homes per year, and that this will be reviewed, following the adoption of the emerging London Plan. The current Draft London Plan aims to increase this to 811 homes per year for 2019/20 to 2028/2029. The affordable housing specific policies are supported by guidance included in the Affordable Housing Supplementary Planning Document (2014).

4.19 If the proposed scheme was granted planning permission (on a brownfield development site), it would deliver 116 homes, which is 37% of Richmond's current annual housing delivery target. The table below shows the proportion of housing completions that the scheme could provide, compared with LBRuT's housing delivery performance over the past 5 years.

Table 06: Richmond's Housing Delivery

Financial Year	Units Completed	% of housing completion total this Site would provide
2013/14	235	49%
2014/15	304	38%
2015/16	491	24%
2016/17	460	25%
2017/18 (est.)	382	30%

4.20 Particularly in the context of a housing delivery target that is likely to more than double in the next year, this scheme can provide a meaningful contribution to housing starts in the locality and deliver a significant, high quality planning gain package to address local priority housing needs.

4.21 Local Plan Policy LP 36 outlines the borough's approach to affordable housing delivery. It specifies a target of 50% of all new housing to be delivered as affordable housing, in a tenure split of 80% for rent and 20% for intermediate housing. As specified within this policy, the LPA will seek the maximum reasonable amount of affordable housing, throughout the negotiation process. When considering planning applications on a case by case basis, the Council will have

regard to economic viability, individual site costs, the availability of public subsidy and the overall mix of uses and other planning benefits brought forward by a proposed scheme.

- 4.22 If an applicant is unable to meet the policy target for affordable housing delivery, it is necessary to submit viability evidence to demonstrate that the scheme is maximising its contribution towards affordable housing delivery. The Council's primary (but not exclusive) approach to assessing benchmark land value is to consider the Existing Use Value plus a premium approach, in most circumstances as specified within Policy LP36 of the Local Plan.
- 4.23 The Council's Housing Strategy 2013-17 sets out the Council's housing priorities. This demonstrates local needs and recognises the importance of delivering houses for rent in the borough and working within the challenges specific to the borough with particular concerns over affordability. There is a national definition of affordable housing and the Council will consider different products, such as for intermediate rent or low-cost home ownership, to ensure delivery at a local level is affordable and relevant to the housing needs in the borough. The Council's Tenancy Strategy (2013) and Intermediate Housing Policy Statement (January 2018) set out guidance which should inform the provision of a range of affordable housing.
- 4.24 The table below sets out affordable housing delivery in the borough over the last five years. The 2017/2018 AMR is yet to be published, however an interim Housing Trajectory and Summary Table 2017/2018 was published in April 2018 and these figures are included in the table below.

Table 07: Richmond's Housing Delivery

Financial Year	Total Housing Units Completed	Private sector AH units	LA/RP owned sites	Total AH Units	Affordable as % of total completions	% of total annual AH delivery that this site would provide
2013/14	235	29	4	33	14%	130%
2014/15	304	5	1	6	2%	717%
2015/16	491	17	82	99	20%	43%
2016/17	460	56	6	62	13%	69%
2017/18	382	341	-	41	11%	105%

- 4.25 This demonstrates that the provision of 37% onsite affordable housing (43 units) would significantly outperform the schemes delivered by the market sector in the past 5 years. It would provide in excess of all the affordable housing delivered by the market sector in the borough with the provision of a single scheme, when compared to several of the years outlined above.

Summary

- 4.26 In summary, national, regional and local affordable housing policy support the delivery of the maximum reasonable amount of affordable housing that can be viably delivered, alongside other forms of planning gain, Mayoral CIL and local CIL. The policy intent however also seeks to encourage rather than restrict delivery, so development proposals must remain commercially viable and in such circumstances of not meeting policy requirements or guidance aspirations, the onus is on the applicant to demonstrate a robust and transparent viability case.

5 AFFORDABLE HOUSING DELIVERY

- 5.1 The Development will provide 116 residential homes, comprising a mix of one to three bed units. The affordable housing element of the scheme includes 43 units (37% by unit and 33% by habitable room), in a mix of unit sizes. The tables below indicate the proposed tenure and unit mix calculated in terms of units and habitable rooms.

Tenure and Mix

Table 03: Affordable Residential housing unit mix

Unit Type	Affordable Rent	Shared Ownership	Total
One bed		13	13
Two Bed	1	15	15
Three Bed	8	6	14
Total	9	34	43
%	21%	79%	100%

- 5.2 The affordable rented units will be provided as Townhouses in units C1-C8 and H1, with the shared ownership houses in C11-14. The shared ownership apartments will be in blocks A and F.

Table 04: Affordable Habitable Room Numbers

Tenure - Habitable Rooms			
	Affordable Rent	Shared Ownership	Total
1 bed		26	26
2 bed	3	45	48
3 bed	33	26	59
Total	36	97	133
Percentage	27%	73%	100%

Affordability

Rented Affordable Housing

- 5.3 The Affordable Rent tenure can be delivered in different ways by different local authorities, with rent setting guidance based on local research of affordability and housing need at a local level. It is then incumbent on local authorities to demonstrate how they are maximising contributions

towards affordable housing where rents are depressed beyond the national and regional guidelines.

- 5.4 LBRuT set out their approach to rented accommodation within the Tenancy Strategy (2013). The Council has provided guideline rents that Registered Providers must consider when setting rents in the most expensive areas of the borough. The table below sets out Richmond's guideline for Affordable Rents.

Table 05: Richmond Guideline Rents (January 2013)

Bed Size	Total Benefit under Welfare Cap	% of welfare benefits to be available to meet housing costs	Guideline Rent in expensive private rented areas in Richmond
1 bed	£350	60%	£210
2 bed	£500	45%	£225
3 bed	£500	40%	£200

- 5.5 LBRuT maintain that Affordable Rents and should consider the following:

- LHA rates
 - £216.06 for a 1 bed
 - £280.06 for a 2 bed
 - £336.96 for a 3 bed
 - £429.53 for a 4 bed
- % of welfare benefits being applied to meet housing costs by property size
- 80% of prevailing market rents

- 5.6 The borough will support the lower of these figures. Affordable Rent allowances are inclusive of service charge. If the service charges are in excess of the level that RPs would normally charge, the net rent is restricted and as such, the value of the Affordable Rented units is reduced.

- 5.7 It is noted that the borough's preferred position is to charge a lesser rent for a three-bedroom unit than a two-bedroom unit. We would welcome the opportunity to discuss this in more detail as we are conscious that this creates a marketing conflict for the future Registered Provider and a perverse incentive for potential residents to overinflate a preference or need for

a larger sized unit. Increasing the rental charge for three-bedroom units to in excess of that for a two-bedroom unit (£225/week), would still be well within the Local Housing Allowance cap for a three-bedroom unit (at £337/week).

Shared Ownership

- 5.8 The affordability of intermediate units is determined by the total housing costs that are payable by the occupier. Under the shared ownership model, a tenant purchases an initial equity share of the property upon which they take out a mortgage. They then pay a rent to a Registered Provider, based on the percentage of equity that they do not own, typically charged at between 0.5% - 2.75%, as well as the relevant service charge. The combination of mortgage, rent and service charge forms the purchaser's housing costs. The generally accepted practice is that these housing costs must not exceed 40% of net household income in line with Homes England guidance.
- 5.9 For the purposes of the proposal, the focus for the intermediate housing is to ensure that the product is affordable to those on incomes less than £90,000 as specified by the GLA and that the total housing costs should be no greater than 40% of the net household income to ensure that the product is affordable. DS2 have valued the 34 shared ownership units on this basis.
- 5.10 The shared ownership units range in size from 1 bed to 3 bed. The home types are available to a spectrum of affordability thresholds, spanning from incomes of £52,000, up to £90,000.

Design for affordability and ongoing management and maintenance

- 5.11 Only Shared ownership affordable housing is included in the apartment building alongside market housing. All residents of the building will have a service charge obligation to meet, which will be factored into the affordability calculations already used by the Registered Provider to assess scheme eligibility.
- 5.12 It is not possible to isolate a building core for a Registered Provider to take ownership of, therefore this tenure mix arrangement is the best way of protecting the long-term affordability position of the scheme and the successful integration of affordable housing on site. An isolated affordable housing core would mean that a Registered Provider could control its own service charging regime, appropriate to any tenure affordable housing.
- 5.13 Service charges will be limited to the normal service charge costs anticipated for the services provided within the building and limited additional estates charges such as the maintenance of the external fabric of the building will apply.

Private Amenity Provision

- 5.14 All of the shared ownership apartments will benefit from terraces and balconies in line with London Plan amenity space requirements.

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- 5.15 Each family house in both the affordable rented and shared ownership tenures is provided with a rear garden of at least 17 sqm. Access to a private garden is rare for affordable housing schemes delivered via Section 106 contributions and we suggest this is an excellent benefit for future residents.
- 5.16 Family housing provision will be prioritised to let to families with children, therefore both individual gardens and the communal playspace delivered by the scheme are significant assets to the affordable housing offer herein. It is also well documented that easy access to the outdoors from a property and the provision of natural daylight have positive effects on general health and wellbeing. This is particularly important for the affordable housing sector where choice over accommodation can be more limited.

6 APPROACH TO FINANCIAL VIABILITY

- 6.1 This section of the report sets out the methodology for determining whether a contribution is available to support scheme-wide Section 106 benefits, including the delivery of affordable housing. In line with local and regional policy, the amount of affordable housing capable of being supported will be determined principally by the scheme viability.
- 6.2 The financial appraisal of the proposed development will be available for review by the Council's Independent Assessor, under separate cover.
- 6.3 The financial appraisal is based on a residual valuation methodology. The financial model robustly tests that the maximum reasonable contribution towards affordable housing is made, in line with adopted policy.
- 6.4 The Applicant has engaged a wider team of experts to advise on the proposed development (e.g. architects, cost consultants and technical delivery specialists), who have applied their development experience to determine the appropriate inputs to the financial appraisal. The team has been working together throughout the pre-application process to provide comprehensive and robust information to the Council's Independent Assessor.
- 6.5 Through contributing to local affordable housing delivery on site the Applicant is aiding the local authority in improving housing for Richmond residents.
- 6.6 The DS2 FVA will be subject to independent verification by the Council's viability advisor. The final outcome of the scrutiny of the viability review and detailed discussion with the Council, will determine the absolute contribution towards affordable housing delivery that the scheme is able to make and how the proposal best addresses local priority housing need.
- 6.7 The proposals include a mix of tenure types, with a minimum of 37% of the new homes (calculated on the basis of units) capable of being delivered on-site as affordable housing. The affordable housing would be split between rented and intermediate housing.

7 SUMMARY

- 7.1 In accordance with guidance from LBRuT local planning policy and discussions with the Council's housing team, the development proposes a truly mixed-use scheme which will enhance the existing community provision, provide good quality residential accommodation and an affordable housing contribution to the Borough.
- 7.2 The proposals include a mix of tenure types, with 37% of the new homes (calculated on the basis of units) capable of being delivered on-site as affordable housing, or such an equivalent offer as agreed with LBRuT through discussions on viability and deliverability. The affordable housing would be split between rented and intermediate housing.
- 7.3 Through strong design principles and early interaction with Registered Providers it ensures that;
- Onsite affordable can be maintained as affordable into the future;
 - A mix of unit sizes and household affordability thresholds is provided, allowing access to housing for a cross section of the market;
 - Homes provided are of high quality design, exceed minimum space standards and have excellent access to a variety of private and communal amenities;
- 7.4 Subject to receipt of planning permission, the scheme is able to make a positive contribution to the local area and provide well designed, high quality, onsite affordable housing contributing significantly to the Borough's annual affordable housing delivery target.