



Affordable Housing Statement

Coal House, Branch Hill

July 2023





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1.0 INTRODUCTION

- 1.1 This Affordable Housing Statement has been prepared by hgh Consulting on behalf of Almax Group Capital Limited (the “Applicant”), in support of a full planning application submitted to the London Borough of Camden (“LBC” or “the Council”) to create a single self-contained residential unit at Coal House, Hampstead, NW3 7LS (“the Site”).
- 1.2 The Site adjoins the existing Branch Hill House, which benefits from planning permission for the change of use from a care home (C2) to residential units (C3), approved in August 2021 (ref: 2019/6354/P). This application is to be brought forward as a stand-alone full planning application, with consideration made to the wider context of the change of use of the Branch Hill House site (“main permission”).
- 1.3 The statement should be read in conjunction with a number of other application documents including, but not limited to, the Planning Statement, Deign and Access Statement, Viability Assessment and other technical documents submitted with the planning application.
- 1.4 The remainder of this Affordable Housing Statement is set out as follows:
 - (a) Section 2: The Application Site;
 - (b) Section 3: Policy Context;
 - (c) Section 4: The Viability Assessment; and
 - (d) Section 5: Conclusions.

2.0 THE SITE CONTEXT

The Site

- 2.1 The Site measures approximately 348.5 sqm and is accessed via Branch Hill in the administrative boundary of London Borough of Camden. The application boundary is shown on the accompanying site location plan.
- 2.2 The Site adjoins the north western flank elevation of Branch Hill house, an Edwardian building of little architectural interest which has planning consent to be sensitively restored and converted into residential development, and a poor quality, modern extension built in the 1960s which has planning consent to be demolished and replaced.
- 2.3 The triangular portion of land north of Spedan Close and much of the surrounding area including Branch Hill House Gardens, Branch Hill Wood and Branch Hill Allotments is identified as a Borough Grade 1 Site of Importance for Nature Conservation (“SINC”); and is designated as a Local Green Space (“LGS”).
- 2.4 In relation to other locational and environmental designations, the following are considered relevant:
 - (e) The site has a has PTAL rating of 1b (poor), with Hampstead Underground station 500m to the south west (7-minute walk), with several bus routes at the junction of Heath Street and the A502 (routes 46, 268, 603 and N5).
 - (f) The site is being located within the Hampstead Heath Archaeological Priority Area.
 - (g) The site is not subject to any Tree Preservation Orders (TPOs).
 - (h) The site is located within Flood Zone 1.

3.0 POLICY CONTEXT

Overview

- 3.1 This section sets out an overview of the key planning policy considerations at a national, London and local level that are relevant to this planning application and consideration to affordable housing.

NPPF (2021)

- 3.2 The National Planning Policy Framework (NPPF) (2021) provides a framework within which locally-prepared plans for housing and other development can be produced. The NPPF places greater importance in achieving high quality design and undertaking engagement with local communities and it also provides a clearer framework in which to demonstrate doing so. At the same time, there is greater potential to increase the density and value of development in suitable, central locations.
- 3.3 One of the key objectives is delivering sustainable development. It also highlights that the planning system should be plan-led with 'succinct and up-to-date plans' which 'should provide a positive vision for the future of each area' (Para. 15). It goes on to state that 'where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless: a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and b) the agreed approach contributes to the objective of creating mixed and balanced communities.' (Para. 63)

London Plan (2021)

- 3.4 The London Plan expects residential developments to deliver the maximum reasonable amount of affordable housing possible without compromising the development's viability and overall deliverability.
- 3.5 Policy H4 of the London Plan sets a strategic target of 50% of all new homes across London to be genuinely affordable, through requiring major development to provide affordable housing through the threshold approach. The threshold approach for applications, sets out by Policy H5, initially sets a threshold level of affordable housing on gross residential development at:
- (a) a minimum of 35 per cent (known as the fast-tracked route); or
 - (b) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or
 - (c) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution where the scheme would result in a net loss of industrial capacity.
- 3.6 Fast tracked applications (ie. those that demonstrate the delivery of 35% affordable) are not required to provide a viability assessment at application stage.

Local Policy

- 3.7 At the local level, the Camden Local Plan (July 2017) sets out the strategic policies for the borough. In addition, Camden's Housing CPG (2021) and the Camden Planning Guidance Housing (May 2016, as amended March 2019) are relevant.
- 3.8 Policy H4 (Maximising the supply of affordable housing) requires a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100 square metres GIA or more.
- 3.9 This policy allows that where affordable housing cannot practically be provided on site, or off-site provision would create a better contribution (in terms of quantity or quality). The Council may also accept provision of affordable housing off site in the same area. On sites of fewer than 10 units, the Council will accept a payment-in-lieu of affordable housing (Housing CPG (2021), paragraph 6.7).
- 3.10 Importantly, the requirements for affordable housing are subject to assessment on a site by site basis.

4.0 VIABILITY ASSESSMENT

The “Main Permission”

- 4.1 The main permission at Branch Hill House, for the change of use from C2 care home to C3 residential units, was subject to a Viability Assessment which was independently reviewed during the determination of application ref: 2019/6354/P. The determination of this application confirmed the provision of 4 social rented affordable units at the site, in conjunction with a deferred contribution of £6,985,930, subject to a post construction viability review, towards the provision of affordable housing within LBC.
- 4.2 The main permission was later amended under a S.73 application (ref: 2021/5377/P), which reduced the quantum of units from 34 to 32 residential units.

Coal House

- 4.3 This application is brought forward in isolation and seeks the creation of a single residential unit at the site adjacent to the Branch Hill House site. This standalone application is not proposed to re-open viability discussions in respect to the main permission, but it is considered that the overall viability of the development has not improved.
- 4.4 Nevertheless, it is proposed that a separate upfront financial payment will be made to reflect the proposed additional dwelling. Given this application is for fewer than 10 units, the Council will accept a payment-in-lieu of affordable housing, as set out by Camden’s Housing CPG (2021).
- 4.5 The in lieu payment for the creation of a single unit at the application site represents the maximum contribution and is consistent with policy H4 and Camden’s Housing CPG.

5.0 SUMMARY

- 5.1 This Affordable Housing Statement has been prepared by hgh Consulting on behalf of Almax Group Capital Limited in support of a full planning application to create a self-contained dwelling at Coal House, Hampstead, NW3 7LS.
- 5.2 The extent of the Application Site is shown on the Site Location Plan and described in detail within the Design and Access Statement.
- 5.3 This application is to be brought forward as a stand-alone full planning application, with consideration made to the wider change of use of the Branch Hill House site (“main permission”).
- 5.4 This Affordable Housing Statement has outlined all relevant affordable housing policies at national, London and local levels relevant to the creation of a single residential unit. The statement confirms that the application creates fewer than 10 units and therefore a payment in lieu towards affordable housing is appropriate. The payment in lieu is consistent with Local and regional policy and represents the maximum contribution.
- 5.5 Notwithstanding, this Affordable Housing Statement has set out the minimum requirements for achieving a policy compliant scheme (subject to viability). No further contribution is viably justified.



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