

In the [Camden Local Plan 2017](#), the policies most relevant to this scheme are likely to be:

- Policy H3 – Protecting existing homes
- Policy H4 - Maximising the supply of affordable housing
- Policy H5 - Protecting and improving affordable housing
- Policy H6 - Housing choice and mix
- Policy H7 - Large and small homes

Where there is a requirement for provision of affordable housing, we will also be guided by our SPD [Camden Planning Guidance: Housing 2021](#)

Although the former fire-damaged property has been demolished, we will treat this as existing for the purposes of applying our policies.

In sum, these policies require:

- retention/ replacement of existing residential floorspace, and within that replacement of the existing affordable housing floorspace (in this instance, social rented floorspace)
- a percentage of additional residential floorspace to be for affordable housing: for schemes with an additional residential GIA below 2,500 sqm, the percentage is based on a sliding scale set out in Policy H4
- 10% of new build homes in each development to comply with M4(3) for wheelchair user dwellings – within this, social rented homes should comply with M4(3)(2)(b) as wheelchair-accessible dwellings
- remaining homes in each development to comply with M4(2) for accessible and adaptable dwellings
- all developments should contain a mix of homes with 3-bedrooms or more and some smaller dwellings
- existing affordable homes with 3-or-more bedrooms should be retained or replaced
- developments should contribute to meeting the dwelling size priorities set out in Local Plan para 3.189/ Figure 1, and detailed for affordable housing on pages 24-28 of the Housing CPG

Local Plan Policy H4 and pages 32-33 of the Housing CPG set out in we will operate affordable housing requirements, and make clear that requirements are assessed in terms of Gross Internal Area (GIA), and not the number of homes or Net Internal Area (NIA).

Where there are different tenures sharing a common core and corridors, the common area can be divided on a pro-rata basis such that the ration of NIA to GIA is the same for all tenures.

Existing homes

- the former building had a GIA of 540 sqm, with common core and circulation plus flats and unoccupied rooms having an NIA of 448.5 sqm
- the former building contained leaseholder flats with an NIA of 252.77 sqm (on a pro-rata basis equivalent to 304 sqm GIA) – this can potentially be replaced by market housing

- the former building contained social rented homes and unoccupied homes having an NIA of 195.73 sqm (on a pro-rata basis equivalent to 236 sqm GIA) – this should be replaced by social rented housing
- the tenanted social rented homes occupied an NIA of 147.52 sqm, leaving an untenanted area of 48.21 sqm
- the social rented homes included a 3-bedroom flat, so we would expect at least 1 x 3-bedroom social rent home in the replacement development

Proposed development

Policy requirements

- the proposed development would have a floor area of c. 1,150 sqm GIA
- the additional residential GIA would be 1,150 sqm – 540 sqm = 610 sqm GIA
- under the sliding scale in Policy H4, the additional floor area would attract an affordable housing requirement of 12%, equal to a GIA of 73.2 sqm
- if the overall GIA alters, the affordable housing requirement will also alter
- Policy H4 sets a guideline split of social rent and intermediate rent homes at 60% to 40%: given that 40% of 73.2 sqm would not generate a whole intermediate rented home, we would prioritise delivery of additional social rented housing
- bearing in mind the former untenanted NIA of 48.21 sqm, there may be potential for inclusion of an intermediate rented home in the development if the applicant wished to do so, we would be happy to discuss this further
- the overall affordable housing requirement arising from Policies H3 to H5 is for a GIA of 309.2 sqm
- under Local Plan policies, the remaining 840.8 sqm GIA is could be market housing, made up of 304 sqm replacement housing and 536.9 sqm additional housing

Shadow s106 commitments

- in addition the shadow s106 associated with the permission for demolition 2020/2087/P creates a commitment to deliver 50% affordable housing by floorspace across the scheme, equivalent to 575 sqm GIA in total, an additional 265.8 sqm GIA compared with policy requirements
- the Council can be flexible about the tenure of this additional area, and any further affordable housing that may be offered beyond the 309.2 sqm policy requirement

General

floorspace requirements are applied flexibly to ensure that an appropriate mix of unit sizes is included in the development and all units meet nationally described space standards and comply with requirements for M4(2) and M4(3) dwellings as applicable

Feedback related to the design presented on 26/05/2021

Overall, the scale of the proposed development is considered too large for the site and creates a number of issues that are listed below.

The proposed building occupies most of the plot and reduces the ratio to open space from what is currently on site, also extending the mass further into the site towards neighbouring back gardens. The depth of the building would be much greater than the adjacent ones and at the same time will greatly reduce the amount of open green space around the building. By maintaining an adequate ratio between built and open space on site, the open space could be used as a shared amenity space and it would set the building further back from the neighbouring properties and gardens.

The proposed height is 6 storeys and sits between a four storey structure with pitched roof and a plot with a one storey building set away from the development boundary. Although the building steps away from its adjacent building, the height is considered tall in relation to its surroundings, especially in its current form, and would work better if reduced by at least one storey.

Considering the proposed height and site occupation, the development appears to be greater than the site can accommodate.

A character appraisal of the area highlights the predominance of red brick, pitch roofs and set backs from the street with frontage boundary walls and greenery amongst other dominant features. The street is not consistent in terms of architecture and design quality, with varying heights and a number of historic buildings, infill properties, and modern replicas.

In its current iteration – a block of flats with a regular grid and a mansard type of extension at top level - the proposed building typology would better suit a denser urban context and does not respond to the identified character of the area, which is leafy, with a more suburban feel and a predominant historic architecture with decorative qualities.

We expect the proposal to demonstrate how the building is enhancing the character of the area. In this sense, we are not looking for a pastiche or like-for-like replica of the surrounding architecture (as seen in some buildings in the area) but for the proposal to sit comfortably within its context. A contemporary architectural approach which speaks to its context in terms of mass and scale, proportions, building lines, materiality and general character is considered be suitable.

For instance, the previous design, although less resolved, adopted elements found in the surrounding buildings such as pitched roofs and was broken up into various articulated blocks. We believe the latest proposal has lost some of those characteristics and has adopted a simpler and more generic character.

Some of the design moves are considered positive, such as keeping the existing building line at the front as well as the initial thoughts on materials – using a combination of brick and glazed bricks/tiles that seem to respond to the predominant material in the area.

The proposed front garden accommodates the main building entrance and bike and bin storage. This creates a visual clutter and limits how green the front garden can be. We encourage to find alternative locations for the storage, perhaps within the building itself or better placed within the front.

We agree on ensuring that this development doesn't compromise the possibility of development next door by directing the windows away from it and setting back from the neighbouring plot.