

Affordable Housing Statement

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JAMESTOWN ROAD



REGAL

Jamestown Road

Affordable Housing Statement



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1.0 INTRODUCTION

This Affordable Housing Statement (“AHS”) has been prepared by Regal on behalf of 4C – Jamestown Road Limited (the “Applicant”) for the development site of 33-35 Jamestown Road, London, NW1 7DB and 211 Arlington Road London NW1 7HD (the “Site”).

Full planning permission is sought for the Proposed Development:-

“Demolition of existing buildings and structures to facilitate the creation of a new building comprising basement, ground plus seven storey building for a mix of Purpose Built Student Accommodation (Sui Generis), flexible commercial (Class E) and Residential (Class C3) uses with ancillary plant, courtyards, access, hard and soft landscaping, cycle parking, highway works and all other works associated with the development.”

The Site comprises three buildings located at 33-35 Jamestown Road, London NW1 7DB and 211 Arlington Road London, NW1 7HD within the London Borough of Camden (“LBC”). The Site lies between Jamestown Road to the immediate north and Arlington Road to the east. Camden High Street is located parallel to Arlington Road to the east of the Site.

This content of this AHS is summarised below:-

Affordable Housing Statement summary	
Headline policy requirements	<p>Policy H1 of the London Plan seeks the provision of 52,287 additional homes per year across London. It also identifies a housing provision target of 10,380 additional homes to be completed across a 10-year period in Camden. In support of these identified housing targets, policies GG2 and GG4 of the London Plan encourages the pro-active exploration of the potential to intensify the use of land to support additional homes, prioritising the redevelopment of brownfield land to create mixed and inclusive communities.</p> <p>Policy H4 of the London Plan sets out that the strategic target across London is for 50% of all new homes delivered across London to be genuinely affordable. Policy H5 of the London Plan then sets out the threshold approach for major development proposals which is 35%,</p>

	<p>and 50% for public sector land or on strategic industrial locations. These thresholds determine whether an application can follow the “fast track route”.</p> <p>The Site is public land for the purposes of this policy and therefore subject to the viability tested route in line with part F of the policy, which also requires early and late stage reviews. Policy therefore requires the Proposed Development to provide the maximum viable amount of affordable housing in accordance with a Financial Viability Assessment.</p> <p>Policy H1 of the Local Plan confirms in that the Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes. It further confirms that housing is the priority land use for the Borough.</p> <p>On a local level, Policy H4 of the Local Plan, and the Council’s Housing CPG (Camden Planning Guidance), set out the Council’s requirements for affordable housing, with the target for a proposal of this scale being 50% based on the Site’s capacity to provide more than 25 dwellings (being an uplift of over 2,500 sqm of residential and student accommodation floorspace). The policy also expects developments with a capacity of more than 10 units to provide affordable housing on-site.</p> <p>Policy H4(a) of the Local Plan confirms the guideline mix of affordable housing tenures is 60% social-affordable rent and 40% intermediate housing.</p> <p>In terms of emerging policy, the draft Local Plan proposes a mixed use housing and employment allocation (C18/IDS20f) for the site. It</p>
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	indicates that the site has capacity for 66 additional homes alongside employment uses.
Types & quantum of housing	The Proposed Development would see the delivery of 27 affordable homes on-site comprising 15 two bedroom units and 12 three bedroom units. This represents 30% by floorspace and 36% by habitable room.
Affordable tenure	The proposed tenure split is 10 intermediate and 17 social rent, equating to a 37% intermediate/63% social split.
Affordability	The social rented homes will be provided as X
Housing mix	<p>The Proposed Development will provide a total mix of units as follows:-</p> <ul style="list-style-type: none"> • 15 x 2 Bedroom Units • 12 x 3 Bedroom Units. <p>The mix by tenure is as follows:-</p> <ul style="list-style-type: none"> • Social rent: <ul style="list-style-type: none"> ○ 7 x 2B3P units ○ 2 x 2B4P units ○ 2 x 3B4P units ○ 6 x 3B5P units • Intermediate rent: <ul style="list-style-type: none"> ○ 5 x 2B3P units ○ 1 x 2B4P units ○ 2 x 3B4P units ○ 2 x 3B5P units

	The Proposed Development will provide a mix of medium and high priority units in line with Camden's dwelling size priorities set out in table 1 of the Local Plan.
Design	The Proposed Development will provide exemplary residential quality with all units being dual or triple aspect, with external deck access for the flats and maisonettes facing Arlington Road with their own front doors. All homes will meet and exceed the design standards sought by policies in the Local Plan and London Plan.
Delivery	It is proposed to dispose of the affordable housing units at the site to a Registered Provider who will own and manage the affordable homes. Regal have entered into discussions with multiple Registered Providers of affordable housing from Camden's approved list who have inputted to the design of the proposals.

This AHS provides evidence which demonstrates that the amount, type and mix of housing proposed as part of the Proposed Development is appropriate for the site and proposals, and in accordance with the Development Plan and other material planning considerations.

The AHS should be considered alongside several other documents, including but not limited to the Planning Statement prepared by DP9, the Financial Viability Assessment prepared by BNP Paribas Real Estate and the Design and Access Statement prepared by Morris + Company.

This AHS is structured as follows:-

- Section 2 provides an overview of the Planning Application;
- Section 3 provides the Planning Policy Context;
- Section 4 provides the Approach to Affordable Housing; and
- Section 5 provides a Summary and Conclusions.

2.0 THE APPLICATION

A detailed description of the Site and the Proposed Development is contained within the Planning Statement, by DP9 and the Design and Access Statement prepared by Morris + Company.

The Existing Site

The existing buildings on site comprise a total of 2,173 sqm of floorspace which were last in use as offices and depot, within a Commercial, Business and Service (Class E) and Sui Generis use for the basement car park 2,737 sqm. On this basis, DP9 consider that the only “office” elements on site total 1,436sqm over three different buildings.

The Site comprises three buildings located at 33-35 Jamestown Road, London NW1 7DB and 211 Arlington Road London, NW1 7HD within the London Borough of Camden (“LBC”). The Site lies between Jamestown Road to the immediate north and Arlington Road to the east. Camden High Street is located parallel to Arlington Road to the east of the Site. The site location is shown below (by Morris + Company).



The Site is in a highly accessible location with a Public Transport Accessibility Level (“PTAL”) of 6a. The Site is approximately 500m to the north-west of Camden Town Underground Station, and an estimated 800m to the west of Camden Road Overground Station. The Site is also located in close proximity to several bus stops including Camden High Street and Kentish Town Road. The above demonstrates the Site is situated in a highly sustainable location.

The Development Proposals

Full planning permission is sought for the Proposed Development:-

“Demolition of existing buildings and structures to facilitate redevelopment comprising a Purpose Built Student Accommodation (Sui Generis) block over the basement, ground, plus six storeys and seventh-floor plant room with flexible commercial (Class E) on the ground floor and a residential (Class C3) block over the ground plus five storeys. Each block has two private courtyards with hard and soft landscaping, cycle parking, and associated works”.

The Proposed Development seeks to transform a vacant and underdeveloped site to provide a mix of purpose built student accommodation, much needed affordable housing and flexible commercial space in a sustainable location which will optimise a prominent, derelict, brownfield site and improve its relationship to the wider area through active ground floor frontages and high quality architecture.

The Applicant’s vision is to realise the full potential of this vacant, underutilised and inefficient site on the edge of Camden Town and bring forward an exemplar mixed use sustainable scheme with open spaces that contributes positively to the local area.

The proposed areas for the Proposed Development overall are shown below.

Land Use	Proposed (GIA)	Proposed (GEA)
Flexible Commercial (Class E)	255 sqm	318 sqm
Residential (Class C3)	2,816 sqm	3,360 sqm

Purpose	Built	Student	6,449 sqm	7,224 sqm
Accommodation (Sui Generis)				
Total			9,520 sqm	10,902 sqm

The affordable residential component of the Proposed Development is described in further detail in the table below.

Unit Type	Intermediate Rented Units	Social Units	Rented Units	Intermediate Rented Habitable Rooms	Social Rent Habitable Rooms	PBSA Units
2 bedroom	6	9		18	27	-
3 bedroom	4	8		20	40	-
Market	-	-		-	-	187
TOTAL	10	17		38	64	187
SUB TOTAL	27			105		187
TOTAL Habitable Rooms				292		

In terms of unit mix by tenure, these are described below

Tenure	No. of homes	Homes %	No. of habitable rooms	Habitable rooms %
Social Rent				
2 bed 3 person	7	41%	21	31%
2 bed 4 person	2	12%	6	9%
3 bed 4 person	2	12%	10	15%
3 bed 4 person	6	35%	30	45%
Total	17		67	
Intermediate Rent				
2 bed 3 person	5	50%	15	39%
2 bed 4 person	1	10%	3	8%
3 bed person	2	20%	10	26%
3 bed 5 person	2	20%	10	26%
Total	10		38	

The majority are provided as flats, accessed by deck from a communal entrance on Jamestown Road with three maisonettes accessed directly from Arlington Road, with flats located above. The Proposals represent 30% affordable housing by gross internal floorspace and 36% by habitable room. The measure by floorspace represents a proportionally lower percentage than by habitable room due to the common parts being almost entirely external in the form of deck access and corridors. If these areas were to count towards the total

affordable provision for the purposes of providing a percentage, it would be equal to 35% by floorspace.

All residential accommodation would be high quality, with private external amenity spaces. The housing is centred around a private shared courtyard which provides play space for younger children. This is in line with the local policy requirements for children under 12 which are adequately catered for off site.

3.0 PLANNING POLICY CONTEXT

Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The Development Plan for the Site comprises:-

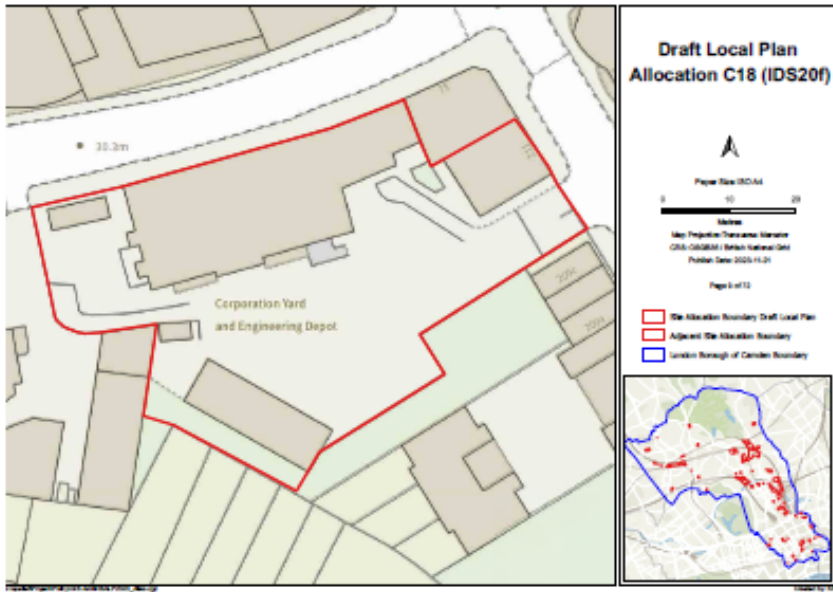
- The London Plan, published in March 2021; and
- The Camden Local Plan, adopted in July 2017.

Relevant material considerations in the assessment of the proposed development include:-

- The NPPF, published in 2012 and updated most recently in December 2023; the Deputy Prime Ministers Ministerial Statement on 30 July 2024, reversing many of the changes made to the NPPF in December 2023,
- National Planning Practice Guidance (“NPPG”) which is periodically updated;
- Camden Planning Guidance (Supplementary Planning Guidance);
- London Planning Guidance;
- The draft New Camden Local Plan (Regulation 18), published in January 2024, having regard to paragraph 48 of the NPPF.

In terms of emerging planning policy designations, the Draft Camden Local Plan identifies the Site in its draft site allocations, under allocation C18 (IDS20f) – “Arlington Road Former Depot Site”. The allocation outlines its preferred use as employment and permanent self-contained homes and the Council suggest an indicative capacity of 66 additional homes. The allocation is shown below.

A full planning policy assessment, including details of the weight that can be attached to draft emerging policy is provided in the submitted Planning Statement, prepared by DP9.

ALLOCATION C18 (IDS20f) – Arlington Road former depot site	
SITE PLAN	
ADDRESS	211 Arlington Road, London, NW1 7HD and 33-35 Jamestown Road, NW1 7DB
AREA	0.2 ha
ALLOCATED USE	Employment and permanent self-contained homes
INDICATIVE CAPACITY	66 additional homes
DESCRIPTION OF EXISTING SITE	The site is located on the corner of Arlington Road and Jamestown Road. The site is located immediately adjacent to, but outside of, Camden Town town centre.
BACKGROUND	
The site was until recently used by Camden Council as offices as a base for its street cleaning services. The depot buildings are generally low rise and have a functional appearance, commensurate with the uses they support.	
DEVELOPMENT AND DESIGN PRINCIPLES	
<p>Development must:</p> <ul style="list-style-type: none"> a) be designed to ensure that the operation of existing, or future, employment uses on the site are not compromised by the introduction of housing; b) explore opportunities to create a more active and engaging street frontage along Arlington Road and Jamestown Road; c) ensure it relates successfully to the existing public house on the corner of Arlington Road / Jamestown Road, which is a locally listed building, and avoid any adverse impact on its continuing operation; and d) be designed giving careful consideration to scale and massing due to the potential impact on designated conservation areas nearby and neighbouring occupiers. 	

It should be noted that the Applicant submitted representations on the Draft Camden Local Plan which outline that the indicative capacity of the Site should be revised to allow for greater flexibility and consideration of alternative uses on the Site and ensure that the site is optimised through the design led approach.

4.0 APPROACH TO AFFORDABLE HOUSING

Engagement with Registered Providers

Throughout the pre-application process, Regal on behalf of the Applicant have engaged with a variety of approved Registered Providers (“RP”) of affordable housing to inform the design, mix and design of the Proposed Development. Feedback from the RP’s has been positive and is ongoing to identify a preferred partner. At each stage the Applicant has used the feedback from RPs to help inform the evolving design and shape the proposals. The key feedback has been summarised as follows:

- Location and proposals for a separate affordable housing block is supported;
- Tenure and unit mix composition is acceptable in terms of future management;
- Proposed rent levels (Social and Intermediate Rent) are supported and in line with requirements in Camden.

Affordability

As outlined in section 3 of this AHS, the Proposed Development would provide 27 affordable homes with a mix of social and intermediate rent.

Social Rent

It is proposed that the Social-Affordable element of the Scheme will be delivered as Social Rent with weekly rental levels set in line with the Government formula (most recently published in 2023) and guidance which is outlined below:-

- 2 bed: £184.00
- 3 bed: £194.22

As service charges are paid in addition to the rental charge, it is anticipated that the level of service charge will be set at a reasonable and affordable level. The internal design and communal amenity space will be designed in a way that ensures durability and low maintenance ensuring service charges are kept to a minimum.

Intermediate Rent

It is proposed that the intermediate rent levels will be set based on Camden's Intermediate Housing Strategy with income linked levels to be agreed with the Council during determination of the application. The weekly rental levels, inclusive of service charges, have been calculated in line with GLA requirement that:

- No more than 3.5 times the household income threshold to buy;
- No more than 40% of net household income including rent and service charges (with net income assumed to be 70% of gross income).

It is proposed that the 2 and 3 bed units will be allocated to a mixture of families and sharers. It is assumed that there will be two adults on a total household income level of c.£60k per annum each, assuming that households do not collectively spend more than 40% of their net income on rent.

All rents are inclusive of service charges and represent the weekly cost of housing for the household. The above affordability assumptions are estimated at this stage and are subject to change. They are considered reasonable based on the current GLA and LBC income and affordability requirements.

5.0 CONCLUSIONS

Affordable housing is an important element in the proposed delivery of the scheme.

The Applicant has engaged with both the Council and RPs operating in Camden. This consultation has helped inform and shape the proposed tenure and unit mix and the overall design of the scheme. The Applicant is committed to continuing this engagement through the planning process to enjoy the long-term delivery of the scheme, in line with planning and market requirements.

The Proposed Development would see the delivery of 27 affordable homes on-site comprising 15 two bedroom units and 12 three bedroom units. This represents 30% by floorspace and 36% by habitable room.

The proposed tenure split is 10 intermediate and 17 social rent, equating to a 37% intermediate/63% social split which is in line with policy.

Intermediate and social rent will be provided in terms of unit mix which is in line with Cmande's dwelling mix priorities and Camden's priorities for intermediate and social rent levels.

The Proposed Development will make a meaningful contribution to the delivery of affordable housing in Camden to meet the highest priority housing needs.