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14 Blackburn Road, LB Camden

AFFORDABLE HOUSING STATEMENT

Prepared by DS2 LLP for Hampstead Asset Management Ltd

Date 31 March 2025



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APPENDICES

1. ACCOMMODATION SCHEDULE

1. INTRODUCTION

- 1.1 This report is prepared on behalf of Hampstead Asset Management Ltd ('the Applicant') and their delivery partner Fifth State, who will be delivering the regeneration sought by the London Borough of Camden and proposed in the application
- 1.2 DS2 are appointed by the Applicant to prepare an Affordable Housing Statement ("AHS") in support of a planning application for the redevelopment of 14 Blackburn Road, London, NW6 1RZ ("the Site"). The Site falls within the jurisdiction of the London Borough of Camden ("LBC" or "the Council").
- 1.3 The full detailed planning application seeks consent for the following ("the Proposed Development"):

"Demolition and redevelopment of the Site for a mixed-use development comprising purpose built student accommodation (Sui Generis), affordable housing (Use Class C3), lower ground and ground floor flexible commercial/business space comprising of showrooms, retail and ancillary offices (Use Class E/Sui Generis) and a café/PBSA amenity space (Use Class E/Sui Generis) and associated works including service yard, cycle parking, hard and soft landscaping, amenity spaces and plant."

Conflict of Interest

- 1.4 DS2 can confirm that in preparing the AHS there are no conflicts of interest in accordance with the RICS Professional Standard Conflicts of Interest, 1st Edition, which came into effect on 1st January 2018.

Report Structure

- 1.5 This AHS has been structured as follows:
- **Site description**
 - **Development proposals**
 - **Planning policy**
 - **Affordable Housing Proposal**
 - **Detailed Affordable Housing Proposal: Tenure and Mix of Units**
 - **Detailed Affordable Housing Proposal: Rental Levels and Affordability**
 - **Conclusions**
- 1.6 This report has been prepared by Julian King MCiH, a Partner at DS2, who has significant experience of on mixed-use projects, including several schemes providing student accommodation across London.

2. SITE DESCRIPTION

- 2.1 A detailed description of the Site is contained within SM Planning's Planning Statement submitted with the application. A summary is provided below.

Site Location and Description

- 2.2 The site is located in West Hampstead within the London Borough of Camden, to the northeast of West Hampstead station and is currently occupied by a builders' merchants (Builder Depot Limited 'BDL'). The site is located to the rear of properties fronting onto West End Lane in the heart of West Hampstead and extends east/west along Blackburn Road. The site abuts the railway to the south and is to the west of the allocated redevelopment site of the O2 Centre and car park.
- 2.3 A plan showing the site is provided below, with the red line indicating the legal boundary.

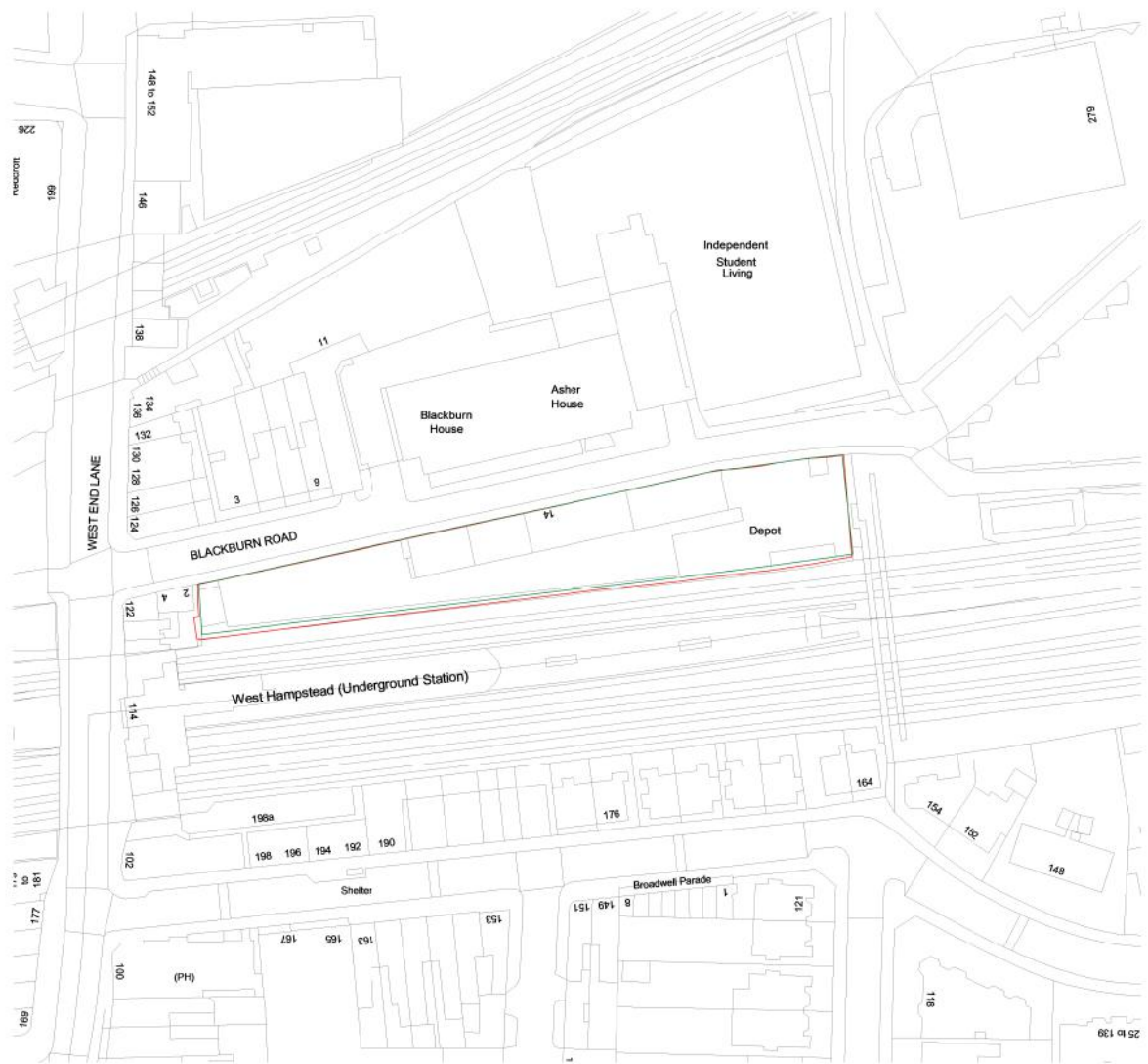


Figure 1 - Existing site plan, hta March 2025)

Ownership

2.4 The Site is owned by the Applicant.

3. DEVELOPMENT PROPOSALS

Proposed Development

- 3.1 A detailed planning application has been submitted by planning consultants, SM Planning, on behalf of the Applicant for the Proposed Development.
- 3.2 A full assessment of the Proposed Development is contained within the Design and Access Statement prepared by the architects, hta. This section of the AHS should be read in conjunction with the plans and drawings submitted as part of the application.
- 3.3 The description of development for the Proposed Development is as follows:
- “Demolition and redevelopment of the Site for a mixed-use development comprising purpose built student accommodation (PBSA) (Sui Generis), affordable housing (Use Class C3), lower ground and ground floor flexible commercial/business space comprising of showrooms, retail and ancillary offices (Use Class E/Sui Generis) and a café/PBSA amenity space (Use Class E/Sui Generis) and associated works including service yard, cycle parking, hard and soft landscaping, amenity spaces and plant.”*
- 3.4 The Proposed Development comprises of two distinct buildings that are linked at ground level. The C3 building will be 4-7 storeys including a taller ground floor and the PBSA building will be 10 storeys including a ground floor and amenity mezzanine level. There is a double height space spanning these lower two floors in the café at the base of the PBSA.

The proposed development would deliver:

- x192 purpose-built student accommodation rooms (Sui Generis)
- x35 affordable homes (C3) and,
- 1,619sqm of lower ground and ground floor commercial floorspace to include: a new and enhanced flexible commercial/business space (Use Class E/Sui Generis) for the Builders Depot, comprising of show rooms, retail space and ancillary offices and an internal service yard accessed from Blackburn Road. This space is capable of being subdivided to allow for future flexibility
- a publicly accessible ground floor café at the base of the PBSA (Use Class E/Sui Generis).
- The proposed development is car free and proposes on-site servicing facilities, incorporating two loading bays with sufficient clearance for another servicing vehicle to wait within the site. Additionally, the scheme proposes an on-street loading bay on Blackburn Road at the western end of the site, subject to agreement with LBC.
- In alignment with the O2 Masterplan, no disabled parking is proposed at Blackburn Road but contributions can be made toward provision of one blue badge space on street subject to feasibility and agreement with LBC.

- In terms of long stay cycle parking spaces, x173 would be provided for the PBSA, x80 for the residential (C3) element and x6 for the commercial use (with x2 of these provided for the Café element). Short stay cycle parking is provided for all uses in suitable publicly accessible locations adjacent to the proposed building, totalling x38 spaces. The proposed short and long stay cycle parking provision accords with the uplift from London Plan requirements set out in the Camden Local Plan Policy T1.
- The Proposed Development provides additional clearance at the Blackburn Road frontage of the site to facilitate delivery of generously dimensioned high-quality pedestrian amenity. By pulling back the building line at ground floor level, the Proposed Development achieves a pavement width of 4.1m at its largest points, 2.4m at its smallest pinch points and 3.5m width across the majority of the pavement. The proposed landscaping treatment includes delivery public realm at the eastern end of the Proposed Development.

Amenity Space

- 3.5 The C3 affordable homes have access to a roof terrace on level 06 at 148m². The PBSA rooms have access to a roof terrace at level 01 measuring 145m². PBSA communal amenity space is 145m². Play space for 0-4 year olds will be allocated on the C3 roof terrace, play for older children will be satisfied with an off-site contribution and subject to feasibility and agreement with LBC.

Details of student accommodation

- 3.6 Bedrooms sizes range from 17-23m². Rooms capable of being occupied by wheelchair users are 24-27m². There are 24 (12%) evenly spread across all floors (3 per floor). All student rooms are 1B1P individual rooms, there are no clusters. Each room will have a small kitchenette for cooking and an ensuite bathroom but can be reconfigured in terms of layout – some examples below.
- 3.7 The communal facilities will be planned out at fit out stage but we have allocated 145.1m² of internal amenity space at ground floor (including the café) and 160.1m² at mezzanine level giving 305m² total internal amenity space. The Proposed Development provides an external amenity terrace at level 01 at 145m². This means there is 1.6m² of shared internal amenity per room and 0.8m² shared external amenity per room.

Affordable C3 Accommodation

- 3.8 The C3 affordable accommodation comprises 132 habitable rooms, which equates to 40.74% of the habitable rooms within the development.
- 3.9 A breakdown of the C3 affordable housing within the Proposed Development is set out in the table below.

Table 1: Affordable Housing Mix, 14 Blackburn Road, March 25							
Tenure	Break down	1B2P	2B3PW	2B4P	3B5P	3B6P	Total
Social Rent	Unit	0	4	8	6	6	24
	Unit Mix	0%	17%	33%	25%	25%	100%
	hab/rms	0	12	32	30	30	104
Intermediate	Unit	8	0	3	0	0	11
	Unit Mix	73%	0%	27%	0%	0%	100%
	hab/rms	16	0	12	0	0	28
Total Units		8	4	11	6	6	35
Total Hab rooms		16	12	44	30	30	132

Scale and massing of development

3.10 The C3 affordable units sit in a building that rises from: 4 to 7 storeys including a taller ground floor. The PBSA building is 10 storeys including a double height ground floor/mezzanine.

Summary

3.11 The Proposed Development includes 192 PBSA rooms together with associated facilities, 35 C3 affordable homes and 1619sqm of commercial floorspace.

4. PLANNING POLICY

- 4.1 SM Planning's Planning Statement submitted as part of the planning application provides an overall review of the planning policy context in relation to the Proposed Development.
- 4.2 The following section of this AHS therefore provides a summary review of the key national and local planning policy that guides the delivery of affordable housing.

National

National Planning Policy Framework

- 4.3 An updated National Planning Policy Framework was published in December 2024.
- 4.4 Paragraph 20 of the NPPF (2024) places a requirement on authorities to set out an overall strategy for the pattern, scale and quality of development and, in particular, make sufficient provision for housing, including affordable housing.
- 4.5 Paragraph 35 requires plans to set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.
- 4.6 Paragraph 64 of the NPPF (2024) states that where there is a need identified for affordable housing, the affordable housing should be provided on-site, except in justified circumstances.
- 4.7 Paragraph 66 of the NPPF (2024) states that where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.
- 4.8 The definition of affordable housing included within the Glossary (Annex 2) of the NPPF includes social rented, affordable rented and intermediate tenure housing as affordable housing i.e. housing provided to eligible households whose needs are not otherwise met by the market.

Regional

London Plan (March 2021)

- 4.9 The London Plan was formally adopted on the 2nd March 2021.

Residential

- 4.10 The London Plan recognises that affordable housing is central to allowing Londoners of all means and backgrounds to play their part in community life. Providing a range of high quality, well-designed, accessible homes is important to delivering 'Good Growth', ensuring that London remains a mixed and inclusive place in which people have a choice about where to live.
- 4.11 The 2017 London Strategic Housing Market Assessment (SHMA) identifies that London needs 66,000 new homes each year, for at least twenty years and evidence suggests that 43,000 of them should be genuinely affordable.

- 4.12 Policy GG4 seeks to ensure that more homes are delivered and supports the delivery of the strategic target of 50% of all new homes being genuinely affordable. Furthermore, there is emphasis on creating mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing.
- 4.13 The London Plan sets out the ten-year targets for net housing completions for which each local planning authority should plan. Boroughs must include these targets in their Development Plan documents. This sets a ten-year housing target of 10,380 new homes for LB Camden, or 1,038 per annum.
- 4.14 Policy H4 sets a strategic target of delivering 50% of all new homes delivered across London to be affordable. The affordable housing should be delivered as genuinely affordable housing. Footnote 53 states that the NPPF defines affordable housing for planning purposes.
- 4.15 Within this broad definition, section 4.6.3 – 4.6.9 of the London Plan sets out the Mayor's preferred affordable housing tenures and other genuinely affordable housing products.
- 4.16 Paragraph 4.6.3 sets out the Mayor's preferred affordable housing tenures which are set out below:
- Homes based on social rent levels, including social rent and London Affordable Rent;
 - London Living Rent;
 - London Shared Ownership.
- 4.17 Paragraph 4.6.7 states that other affordable housing products may be acceptable if, as well as meeting the broad definition of affordable housing, they also meet the London Housing Strategy (dated 2018) definition of genuinely affordable housing and are considered by the borough to be genuinely affordable.
- 4.18 For dwellings to be considered affordable, annual housing costs, including mortgages, rent and service charge should be no greater than 40% of net household income.
- 4.19 Policy H6 states that the Mayor is committed to delivering genuinely affordable housing. The following split of affordable products should be applied to development:
- A minimum of 30% low cost rented homes, allocated according to need and for Londoners on low incomes (Social Rent/London Affordable Rent).
 - A minimum of 30% intermediate products which meet the definition of affordable housing, including London Living Rent and London Shared Ownership.
 - 40% to be determined by the relevant borough based on identified need, provided they are consistent with the definition of affordable housing.

Intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to household incomes of up to £60,000. Intermediate ownership products such as London Shared Ownership and Discounted Market Rent should be affordable to households on incomes of up to £90,000.

Homes for Londoners: Affordable Housing and Viability Supplementary Planning Guidance 2017 (“Affordable Housing and Viability SPG”)

- 4.20 The GLA published their adopted SPG in August 2017. The SPG carries weight in the determination of planning applications.
- 4.21 The SPG represents the Mayoral administration’s policy objectives in relation to the delivery of new homes, including affordable housing and student accommodation.

Local

Camden Local Plan, 2017

- 4.22 LBC’s Local Plan was adopted in 2017 and covers the period 2016 to 2031.

Residential

- 4.23 Policy H4 states that LBC will expect a contribution to affordable housing from all developments that provide one or more additional homes and involve a total addition to residential floorspace of 100sqm GIA or more.
- 4.24 The Council will seek to negotiate the maximum reasonable amount of affordable housing on the following basis:
- The guideline mix of affordable housing types is 60% social-affordable rented housing and 40% intermediate housing;
 - Targets are based on an assessment of development capacity whereby 100sqm (GIA) of housing floorspace is generally considered to create capacity for one home;
 - Targets are applied to additional housing floorspace proposed, not to existing housing floorspace or replacement floorspace;
 - A sliding scale target applies to developments that provide one or more additional homes and have capacity for fewer than 25 additional homes, starting at 2% for one home and increasing by 2% of for each home added to capacity;
 - An affordable housing target of 50% applies to developments with capacity for 25 or more additional dwellings;
 - For developments with capacity for 25 or more additional homes, the Council may seek affordable housing for older people or vulnerable people as part or all of the affordable housing contribution;
 - Where developments have capacity for fewer than 10 additional dwellings, the Council will accept a payment-in-lieu of affordable housing;
 - For developments with capacity for 10 or more additional dwellings, the affordable housing should be provided on site; and
 - Where affordable housing cannot practically be provided on site, or offsite provision would create a better contribution (in terms quantity and/ or quality), the Council may accept provision of affordable housing offsite in the same area, or exceptionally a payment-in-lieu.
- 4.25 Paragraph 3.103 states that “provision of intermediate housing (between the cost of social rented housing and market housing) has some potential to retain middle income households in Camden

and lessen social polarisation. However, high values in many parts Camden mean that the intermediate housing can be more expensive than the market rents available in cheaper areas within the borough or nearby. To balance these concerns, the Council has set guideline percentages for the split of affordable housing types at 60% social-affordable rented housing and 40% intermediate housing.”

- 4.26 Paragraph 3.104 states that “Intermediate housing for shared ownership can help households into owner occupation, but in Camden it is rarely possible for providers to deliver shared ownership housing that would be affordable for households with incomes close to the median household income in Camden, and highly challenging to deliver schemes meeting the income thresholds set out in the London Plan. Given these constraints, we will strongly encourage provision of homes for intermediate rent rather than shared ownership, subject to maximising overall affordable housing output in the context of the resources available and development viability. We will also encourage the development of innovative intermediate housing products that can be made affordable to a wider range of groups in Camden.”
- 4.27 Paragraph 3.105 states that “these guidelines will be applied flexibly taking into account the criteria in Policy H4, and in certain circumstances the Council may support proposals which only provide social-affordable rented housing or only provide intermediate housing. We will encourage a focus on social-affordable housing where a proposal falls far short of the affordable housing target (e.g. below 30% affordable), or intermediate housing cannot be delivered for people in a range of incomes below the London Plan thresholds. Where a proposal substantially exceeds the affordable housing target (e.g. over 65% affordable), the Council may support development that only provides intermediate housing, particularly if it is designed to meet the needs of a particular group.”

LB Camden Planning Guidance - Housing, 2021

- 4.28 Paragraph 3.17 states that “the NPPF indicates that affordable housing for rent (unless it forms part of a Build to Rent scheme) should be let by a Registered Provider (most of which are local authorities and housing associations) and should remain at an affordable price for future eligible households, otherwise the subsidy should be recycled for alternative affordable housing provision.”
- 4.29 Paragraph 3.18 states that “to satisfy the stipulations of the NPPF, best meet the needs of Camden residents, and ensure that we work with registered providers who share the Council’s affordable housing priorities, the Council has agreed an Approved Strategic Partner List.”
- 4.30 Paragraph 3.21 states that the Council expects affordable housing and market housing to form integral parts of each development. The development should be tenure blind, using a common design approach, with high quality materials and finishes throughout. Where a development site is large enough to accommodate several residential blocks, market and affordable blocks should be spread evenly across the site. The layout of the development should optimise residential amenity for all tenures, and avoid concentrating affordable housing close to potential sources of disturbance such as service yards, traffic and railways”
- 4.31 Paragraph 3.22 states that “in schemes with internal communal spaces, the Council does not generally seek to mix affordable and market dwellings on the same corridors or sharing the same lobbies, stairs and/ or lifts, but still expects the development to be tenure-blind in terms of the design approach and the quality of the homes. We do not seek to mix units of different tenures because occupiers have to pay a service charge and/ or management charge for the cleaning and maintenance of communal spaces, and the service charges for market homes are often too high for the occupiers of affordable homes. The law ensures that an occupier cannot be required

to pay higher service charges to subsidise charges to another occupier receiving the same common services, regardless of tenure.”

- 4.32 Paragraph 3.25 reiterates the Local Plan, stating that “Local Plan Policy H4 sets out guidelines for assessing development proposals indicating that 60% of affordable housing should be social affordable rented housing (referred to as 'low cost rented homes' in the draft London Plan 2019) and 40% should be intermediate housing (referred to as 'intermediate products' in the draft London Plan).
- 4.33 Paragraph 3.27 states that “Local Plan Policy H4 indicates that the Council will consider various characteristics of the development, the site and the area when negotiating the nature of the affordable housing contribution from specific schemes. Considerations that may influence the proportion of social-affordable rented housing and intermediate housing are set out in paragraph 3.105 of the Local Plan. Circumstances where the Council may depart from the 60% social-affordable rented: 40% intermediate split include:
- providing flexibility for up to 100% social-affordable rented housing or 100% intermediate housing where the overall proportion of affordable housing in the scheme is over 65%; and
 - seeking up to 100% social-affordable rented housing where the overall proportion of affordable housing in the scheme is 30% or less”
- 4.34 Paragraph 3.28 states that “Draft London Plan Policy H6 - Affordable housing tenure seeks a minimum of 30% 'low cost rented homes' and a minimum of 30% 'intermediate products', with the remaining 40% to be determined by the borough. The Council has advised the GLA that it will split the remaining 40% to support the existing Local Plan position, with 30% added to 'low cost rented homes' and 10% added to 'intermediate products'. Consequently, the 60%/ 40% guideline mix in Local Plan Policy H4 will continue to have effect and is consistent with the provisions of draft London Plan Policy H6.”
- 4.35 Paragraph 3.37 states that “as indicated by the Local Plan Dwelling Size Priorities Table, we will also place a high priority on securing smaller homes with two bedrooms for social-affordable rent. Where it is not possible to achieve 50% large homes, we will seek a high proportion of two-bedroom homes designed for four occupiers.”
- 4.36 Paragraph 3.38 requires the following for social-affordable housing.

Overall aim: 50% of homes with 3 bedrooms or more

Preferred mix:

- 1-bedroom homes – no more than 15%
- 2-bedroom homes – 35%
- 3-bedroom homes – 30% or up to 50% if our preferred percentage of 4-bedroom homes is not provided
- 4-bedroom homes – 20%

Other objectives:

- A proportion of social-affordable rented homes should have physically separate kitchens and living areas where practical, particularly 3- and 4-bedrooms homes.

Wheelchair user dwellings:

In accordance with Local Plan Policy H6 and accompanying paragraphs 3.154 - 3.155:

- at least 10% of affordable homes should be designed to comply with Building Regulation M4(3) for wheelchair user dwellings
- we will aim for social-affordable rented homes to include more than 10% wheelchair user dwellings where possible, with a corresponding reduction in the market and/ or intermediate sectors
- we will particularly seek wheelchair user dwellings in the social-affordable rented sector in the form of 2-bedroom 4-person homes and 3-bedroom 5-person homes or 3-bedroom 6-person homes
- wheelchair user dwellings in the social-affordable rented sector should be designed, built and fitted-out to comply with Building Regulation M4(3)(2)(b) for *wheelchair accessible dwellings*.

- 4.37 Paragraph 3.40 states that “the Council will generally seek intermediate rented housing in accordance with our Intermediate Housing Strategy, rather than other intermediate products (eg shared-ownership housing), as set out in paragraphs 3.9 and 3.10 of this guidance. The majority of intermediate housing in each scheme should be affordable to households with gross annual incomes between £31,950 and £42,600 (based on 2019 earnings, with incomes adjusted by wage inflation), and all should be affordable with gross annual incomes of no more than £60,000 (subject to updates in the London Plan Annual Monitoring Report).”
- 4.38 Paragraph 3.43 states that “based on the affordability calculation set out above, the maximum cost affordable to a household with a gross annual income of £31,950 would be £172 per week, the maximum cost with a gross annual income of £42,600 would be £229 per week, and the maximum cost with a gross annual income of £60,000 would be £323 per week.”
- 4.39 Paragraph 3.44 states that “in accordance with Local Plan Policy H6, for intermediate housing, we will give high priority to studio and one-bedroom homes and will also support two bedroom/ four person homes in appropriate circumstances, as set out in paragraph 3.46 below. To ensure that housing costs reflect dwelling size and provide for our target income groups, a scheme could potentially include studio flats at rents of £172 per week, one-bedroom flats at rents of £229 per week and two-bedroom flats at rents of £323 per week. However, we will seek a range of

rents appropriate to the particular homes in each scheme, subject to ensuring they are affordable to households with gross annual household incomes of no more than £60,000 per year (subject to updates in the London Plan Annual Monitoring Report)."

4.40

Preferred mix:

- Studio flats/ 1-bedroom homes –
a substantial proportion is expected in all schemes
- 2-bedroom homes –
a proportion of high quality two bedroom/ four-person homes may be included where they are genuinely suitable for sharers, and available for letting on a shared basis to two jointly-eligible households, as well as letting to families
- 3-bedrooms or more -
we will only support provision of intermediate homes with three bedrooms or more where they are genuinely affordable to target income families and can be included without a reduction in the proportion of Social Rented homes

Other objectives:

- Intermediate rented homes should be affordable to the target income groups set out in paragraphs 3.40 and 3.42 of this guidance.

Wheelchair user dwellings:

In accordance with Local Plan Policy H6 and accompanying paragraphs 3.154 - 3.155:

- at least 10% of affordable homes should be designed to comply with Building Regulation M4(3) for wheelchair user dwellings
- we will aim for social-affordable rented homes to include more than 10% wheelchair user dwellings where possible, with a corresponding reduction in the market and intermediate sectors
- any wheelchair user dwellings in the intermediate sector should be designed to comply with Building Regulation M4(3)(2)(a) for *wheelchair adaptable dwellings*.

5. AFFORDABLE HOUSING PROPOSAL

- 5.1 In this section of the report the proposed affordable housing offer is set out.
- 5.2 The Proposed Development delivers 35 C3 affordable housing units which equates to 40.74% affordable housing provision by habitable room when based on the percentage affordable of the aggregate of the affordable housing and student habitable rooms. This results in 24 social rent units and 11 Intermediate housing units.
- 5.3 The affordable housing offer is summarised in Table 1.

6. DETAILED AFFORDABLE HOUSING PROPOSAL: TENURE AND MIX OF UNITS

6.1 This section provides further detail on affordable housing requirements in LBC. The Applicant's affordable housing proposal is then discussed in relation to this.

Affordable Housing Tenure and Types

6.2 There are a wide range of affordable housing products that can be delivered to accommodate households with different needs and income levels. All affordable housing products fall into two broad categories: social housing and intermediate housing.

6.3 Social Rent and Intermediate Rent are the housing products proposed for the Proposed Development, in line with Policy H4 of LBC's Local Plan.

6.4 The unit and tenure mix has been discussed with LBC Housing and consulted upon with RPs.

Low Cost Rented (Social/ Affordable Housing)

6.5 In line with the NPPF, affordable housing for rent is set in accordance with Government's rent policy for social rent (SR) or affordable rent (AR) or is at least 20% below local market levels.

6.6 SR homes are for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator's Guidance. The rent levels for SR homes use a capped formula (SPG).

6.7 A breakdown of the proposed Low Cost Rent (Social Affordable Rented) units is set out in the table below.

Table 2: Social Rent Unit Mix and Habitable Room, 14 Blackburn Road, March 25								
Tenure	Break down	Break down	1B2P	2B3PW	2B4P	3B5P	3B6P	Total
Social Rent	Unit	Unit	0	4	8	6	6	24
	Unit Mix	Unit Mix	0%	17%	33%	25%	25%	100%
	hab/rms	hab/rms	0	12	32	30	30	104

Intermediate Housing

6.8 Intermediate Housing includes:

"Intermediate housing includes 'low-cost home ownership' products and 'discount market rent' products" (pp.24, NPPF (2024)).

6.9 The intermediate housing will be provided as Intermediate Rent.

6.10 A breakdown of the proposed Intermediate Rent units is set out in the table below.

Table 3: Intermediate Housing Unit Mix and Habitable Rooms, 14 Blackburn Road, March 25				
Tenure	Break down	1B2P	2B4P	Total
Intermediate	Unit	8	3	11
	Unit Mix	73%	27%	100%
	hab/rms	16	12	28

Location of Units

6.11 The affordable homes are all located within a single building, separate from the PBSA Block at the western end of the Proposed Development.

Design of Units

6.12 The affordable housing units have been designed in accordance with the London Plan and the GLA's Supplementary Planning Guidance.

6.13 The following tables sets out the average sizes per unit type of the Proposed Development.

Table 4: Average Affordable Unit Sizes, 14 Blackburn Road, March 25					
	1B2P	2B3PW	2B4P	3B5P	3B6P
Average (sqm)	63.0	85.7	82.7	98.8	105.5
Average (sq ft)	674	917	885	1057	1129

6.14 These unit sizes all exceed those required in Nationally Described Space Standard.

6.15 The residential accommodation has been designed to incorporate a number of key measures that will enhance their resident's lives and offer variations within the same overall unit types. This will be combined with variations to the design and appearance of the shared areas on each floor to allow easier navigation of the building.

6.16 Key shared elements of the design of the homes are:

- 100% of the units are dual aspect
- The units benefit from an open access deck to the street.
- The affordable element of the scheme has been designed to be tenure blind.

Wheelchair Accessible Units

6.17 As required by Policy H6 of the Local Plan 10% of the social rent homes (measured by habitable room) will be provided as wheelchair accessible and meet Building Regulation M4(3)(2)(b) standard. The Proposed Development will provide 4 social rent wheelchair accessible units which accounts for 11% by habitable room.

Design and Register Provider (RP) Engagement

6.18 As well as consulting with LBC's Planning and Housing teams, during the design process we have also engaged with a number of the LBC's Preferred Affordable Housing Partners to ensure that the Proposed Development meets their requirements and expectations.

- 6.19 The RPs consulted were Sovereign Network, Origin/PfP and Notting Hill Genesis in regard to the design of the affordable housing on 14 Blackburn Road.
- 6.20 We spoke to these organisations on two occasions, in September 2024 and February 2025. This allowed the RPs to input into the design of the Proposed Development, to ensure the delivery of high-quality affordable housing.
- 6.21 During our design process particular attention was paid to the tenure mix and location, amenity space, access arrangements and minimising service charges.
- 6.22 The proposed designs were well received by the RPs and comments were relatively minor.
- 6.23 The key issue raised regarded the location of the Social Rent and Intermediate units within the C3 building.
- 6.24 We also refined the location of family units within the development on RP advice, ensuring that the configuration lends itself to more efficient management.
- 6.25 We sought feedback on the internal layout of units, which have been designed in line with RP feedback. In particular the larger units offer separate living and dining areas for maximum flexibility for families.
- 6.26 The entrance and ground floor design was rationalised on RP advice to provide a more effective split between uses and a more coherent access to storage and facilities.

Tenure Split

- 6.27 The key change that was delivered following our consultation with RPs was regarding tenure separation.
- 6.28 Two options were presented during design development. Option 1 delivered 21 (60%) Social Rented units and 14 (40%) Intermediate units, in line with Local Plan Policy H4. This Option saw Intermediate units “pepper potted” among the Social Rented homes.
- 6.29 Option 2 delivered 24 (69%) Social Rented Units and 11 (31%) Intermediate units. The units were configured to be separated by core, with the tenures delivered in discrete sections.
- 6.30 This a more efficient layout which allows better management of the Social Rented and Intermediate tenures, which can have different requirements.
- 6.31 On consultation, there was a clear preference from RPs for Option 2, as the separation of tenures would allow more effective tenancy management.
- 6.32 Whilst Option 2 was the preferred split from RPs, it was not compliant with Local Plan Policy H4, as the scheme would now provide 69% Social Rented Housing, in excess of the 60% required by policy.
- 6.33 On the basis that Option 2 did not comply with policy, confirmation was sought with LBC Planning and Housing that it would be acceptable to over provide Social Rented housing on the development.

Registered Provider Interest

- 6.34 During the consultation process we also offered the RPs contacted the opportunity to express their interest in acquiring the scheme and submit initial offers. The scheme was well received, and at this stage conditional offers have been received from two RPs.

- 6.35 In our opinion the affordable housing element of the scheme has been well designed and will offer a high quality and sustainable living environment for the residents. This has been supported by strong interest from RPs at this relatively early stage.
- 6.36 Once the scheme has received Resolution to Grant Planning Permission at Committee, a formal procurement process will be undertaken, with all of LBC's Preferred RP Partners contacted.

Summary

- 6.37 In general terms, the design is intended to deliver a range of unit sizes across the Proposed Development. The design mediates between the Local Plan and need to deliver a high proportion of affordable housing and maximum number of units overall, as well as the wish to maximise the number of units delivered in an acceptable planning volume.
- 6.38 The Proposed Development delivers a range of different sized accommodation, from 1 bedroom to family sized.
- 6.39 The Low Cost Rented (Social Affordable Rented) accommodation will meet the needs of a range of households, including larger family households.
- 6.40 The Intermediate Housing accommodation will meet the needs of a wide range of households, ranging from single and couple households in the one beds to smaller families or potentially sharers living in the 2 bed 4 person units.
- 6.41 The requirements to ensure that 10% of all C3 residential habitable rooms are wheelchair accessible has been met through the provision of 4 (11%) units.
- 6.42 We have worked with the design team and potential RP partners to ensure that the Proposed Development delivers high quality affordable housing that will meet the needs of residents and management teams.

7. DETAILED AFFORDABLE HOUSING OFFER: INCOME LEVELS & AFFORDABILITY

7.1 We have assumed the following rents for the social rented units:

Table 5: Proposed weekly Social Rents, 14 Blackburn Road, March 25				
Unit Type	2B3PW	2B4P	3B5P	3B6P
Rent per week	£190.43	£190.43	£201.02	£201.02

7.2 It is anticipated that the intermediate will be delivered with rents that comply with LBC's Planning Guidance - Housing, 2021. The following average rents have been assumed:

- One bedroom - £ 229 per month
- Two bedroom - £ 323 per month

7.3 These rents are compliant with LBC's Planning Guidance - Housing, 2021 and have been confirmed with LBC Housing.

7.4 In accordance with the Planning Guidance – Housing, 2021 paragraph 3.43, these rents are affordable to households with incomes between £42,600 and £60,000 per annum.

7.5 As a final affordability safeguard, the rent for any individual home must be at least 20 per cent below its assessed market rent as stated in the NPPF (2024).

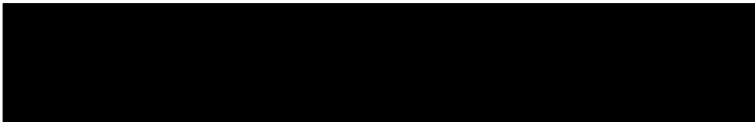
8. CONCLUSION

- 8.1 Affordable housing is an important element of the Proposed Development.
- 8.2 The Proposed Development will deliver a significant number of planning benefits which will serve to enhance the local area and further afield including 192 high quality student homes alongside 35 affordable C3 residential homes. This reflects the provision of 40.74% affordable housing when calculated as a percentage of the total habitable rooms.
- 8.3 The Applicant has undertaken extensive consultation with Registered Providers to design suitable affordable housing that will meet the needs of a wide range of households in housing need and can be effectively managed by a RP in the longer term.

Prepared by:



Julian King
Partner



For and on behalf of: Hampstead Asset Management Ltd

Date: 31 March 2025

APPENDIX ONE: ACCOMMODATION SCHEDULE

Job Title	Blackburn Road	
Job Code	FST-BRC	
Schedule	Accommodation Schedule	
Revisions		
Date	Revision	Comment
13.09.24	P01	For information
16.09.24	P02	GIA/NSA Figures Added
17.09.24	P03	Ground + Basement Amendments
12.11.24	P04	Introduction of second stair

PBSA Student Rooms

PBSA Student Rooms Types					
	1B1P-A	1B1P-B	1B1P-C	1B1PW-A	1B1PW-B
Average (sqm)	17.4	17.5	22.5	24.5	27.3
hab rooms	1	1	1	1	1

PBSA Student Rooms Mix					
Total Rooms per type	128	16	24	16	8
Proposed Mix	67%	8%	13%	8%	4%
Total Rooms	192				
Total hab/rms per type	128	16	24	16	8
Total hab/rms	192				

PBSA Student Amenity Overview			
Shared Internal Amenity NIA (m2)		Shared External Amenity (m2)	
Mezzanine Level Student Amenity	160.1	Level 01 Roof Terrace	145
Level 00 Cafe	145.1		
Total Amenity	305.2	145	
m2 per studio	1.6	0.8	
m2 per studio	2.3		

PBSA Cycle Provision			
Unit Type	Total No. Units	London Plan Provision	Local Plan Uplift*
1B	192	144	173
Total Cycles	173		
Sheffield	20%	35	
2-tier	75%	130	
Adaptable	5%	9	

*20% uplift as per Camden Council's Local Plan Policy T1

PBSA Recycling and Refuse - British Standard BS5906:2005 - Waste management in buildings					
	Litres per room	Total litres	Total litres per type	No. of 1280L Bins	No. of 500L Bins
Mixed recycling bin (@50%)	70	13440	6720	6	
Refuse (@50%)			6720	6	
Food Waste					

Summary - % Affordable

Percentage per Habitable Rooms	
Total hab/rms	324
PBSA hab/rms	192
% PBSA	59.26%
C3 hab/rms	132
% C3	40.74%
Percentage per NIA (sqm)	
Total NIA (includes student amenity)	6919
PBSA NIA (includes student amenity)	3937
% PBSA	56.90%
C3 NIA	2982
% C3	43.10%
Percentage per GIA (sqm)	
Total GIA (PBSA + C3)	10445
PBSA GIA	6499
% PBSA	62.22%
C3 GIA	3946
% C3	37.78%

C3 Affordable Homes

C3 Affordable Home Sizes		*		*	
	1B2P	2B3PW	2B4P	3B5P	3B6P
Average (sqm)**	63.0	85.7	82.7	98.8	105.5
hab rooms	2	3	4	5	5

* Unit has separate kitchen/dining and living rooms
** Areas include added internal amenity space

C3 Affordable Homes Mix					
Total Units per size	8	4	11	6	6
		15		12	
Proposed Mix	23%		43%		34%
Total Units	35				
Total hab/rms per size	16	12	44	30	30
Total hab/rms	132				

11%
M4(3) Units

C3 Amenity Overview					
	Private Internal Amenity NIA (m2)			Shared External Amenity (m2)	
	1B2P	2B3P/2B4P	3B5P/3B6P	Level 06 Roof Terrace	148
Added Internal Space	5	6/7	8/9		
Total Amenity				148	
m2 per unit	5.0	6.0 / 7.0	8.0 / 9.0	4.2	

C3 Cycle Provision			
Unit Type	Total No. Units	London Plan Provision	Local Plan Uplift*
1B	8	12	15
2B	15	30	36
3B	12	24	29
Total Cycles	80		
Sheffield	20%	16	
2-tier	75%	60	
Adaptable	5%	4	

C3 Recycling and Refuse - Waste storage and arrangements for residential and commercial units (Supporting document for planning guidance CPG 1 DESIGN Storage and collection of recycling and waste)				
	Litres per unit	Total litres	No. of 1280L Bins	No. of 500L Bins
Mixed recycling bin	140	4900	4	
Refuse	120	4200	4	
Food Waste	23	805		2

7m3 Required for Bulk Waste and Electricals

C3 - Social Rent - Intermediate Split					
Housing CPG - January 2021 - 3.0 - 60%-40%					
Social Rent				Intermediate	
69%				31%	
24				11	
Housing CPG - January 2021 - 3.38 Preferred Mix of social-affordable rented housing				Housing CPG - January 2021 - 3.44 Preferred Mix of intermediate rented housing	
2B		3B		1B	2B
35%		50%		Highest Priority	
Proposed Mix					
2B3PW	2B4P	3B5P	3B6P	1B2P	2B4P
17%	33%	25%	25%	73%	27%
4	8	6	6	8	3

Job Title	Blackburn Road	Revisions						
Job Code	FST-BRC	Date	Revision		Comment		Date	Revision
Schedule	Accommodation Schedule - Level by level	13.09.24	P01		For information		17.02.25	P08
		16.09.24	P02		GIA/NSA Figures Added		27.02.25	P09
		17.09.24	P03		Ground + Basement Amendments		06.03.25	P10
		12.11.24	P04		Introduction of second stair			
		07.01.25	P05		Changes post-DRP			
		10.01.25	P06		Issue for coordination			
		07.02.25	P07		Issue for coordination - Shared Plant Added			

Commercial

NSA (Commercial)	
SQM	SQFT

Level 09 (PBSA Roof)		
Level 08		
Level 07 (C3 Roof)		
Level 06		
Level 05		
Level 04		
Level 03		
Level 02		
Level 01		
Mezzanine Level		
Street Level	776	8353
Platform Level / Basement	607	6534

Service Yard	236	2540
TOTALS	1619	17427
TOTALS (Without Service Yard)	1383	14887

Total NSA (C3 + PBSA) SQM	6639
Total GIA (C3 + PBSA) SQM	10445

Total GIA SQM	12355
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C3 Affordable Homes

NSA (C3)		GIA (C3)		NSA/GIA
SQM	SQFT	SQM	SQFT	%

372	4005	464	4994	80%
498	5360	594	6394	84%
580	6242	678	7298	86%
580	6242	678	7298	86%
580	6242	678	7298	86%
372	4005	464	4994	80%
		119	1281	
		271	2917	

2981.9	32097	3946	42475
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Gross Internal Area (GIA) has been measured as the area of each tenure measured to the internal face of the perimeter walls at each floor level as per RICS' Code of Measuring Practice 2015'

PBSA Student Rooms

NSA (PBSA)		GIA (PBSA)		NSA/GIA
SQM	SQFT	SQM	SQFT	%

457	4920	689	7416	66%
457	4920	689	7416	66%
457	4920	689	7416	66%
457	4920	689	7416	66%
457	4920	689	7416	66%
457	4920	689	7416	66%
457	4920	689	7416	66%
457	4920	689	7416	66%
		241	2594	
		341	3671	
		405	4359	

3657	39362	6499	69955
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Shared Plant

GIA (Plant)	
SQM	SQFT

Commercial Sprinkler	162	1744
Substations	71	764
Generator	58	624

291	3132
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Job Title	Blackburn Road			Date	Revision	Comment
Job Code	FST-BRC			07.01.25	P05	Changes post-DRP
Schedule	Accommodation Schedule			10.01.25	P06	Issue for coordination
Revisions				15.01.25	P07	Issue with bins and bicycles
	Date	Revision	Comment	07.02.25	P07	Issue for coordination - Shared Plant Added
	13.09.24	P01	For information	17.02.25	P08	C3 Tenures updated
	16.09.24	P02	GIA/NSA Figures Added	27.02.25	P09	Design Freeze Issue
	17.09.24	P03	Ground + Basement Amendments	06.03.25	P10	Units level by level added
	12.11.24	P04	Introduction of second stair			

C3 Affordable Homes

	1B2P	2B3PW	2B4P	3B5P	3B6P	Totals by Floor
Level 09 (PBSA Roof)						
Level 08						
Level 07 (C3 Roof)						
Level 06	0	0	2	1	1	4
Level 05	2	0	2	1	1	6
Level 04	2	1	2	1	1	7
Level 03	2	1	2	1	1	7
Level 02	2	1	2	1	1	7
Level 01	0	1	1	1	1	4
Mezzanine Level						
Street Level						
Platform Level / Basement						
Totals by Type	8	4	11	6	6	35

PBSA Student Rooms

	1B1P-A	1B1P-B	1B1P-C	1B1PW-A	1B1PW-B	Totals by Floor
Level 09 (PBSA Roof)						
Level 08	16	2	3	2	1	24
Level 07 (C3 Roof)	16	2	3	2	1	24
Level 06	16	2	3	2	1	24
Level 05	16	2	3	2	1	24
Level 04	16	2	3	2	1	24
Level 03	16	2	3	2	1	24
Level 02	16	2	3	2	1	24
Level 01	16	2	3	2	1	24
Mezzanine Level						
Street Level						
Platform Level / Basement						
Totals by Type	128	16	24	16	8	192