



**Boyer**  
PLANNING



## OAK GROVE, LONDON NW2

### **Planning Statement**

Prepared by Boyer Planning on behalf of Pocket  
February 2013



# REPORT CONTROL

**Project:** Oak Grove, Camden

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**Client:** Pocket

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**Job Number:** 13.557

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**File Origin:** Z:\Boyer London\Projects\13.557 Oak Grove, Camden\04 Boyer Planning\04.02 Reports

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## Document checking

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**Initialed:** GL

<b>Issue</b>	<b>Date</b>	<b>Status</b>	<b>Checked for issue</b>
1	04/02/14	Draft	GL
2	06/02/14	Draft	GL
3	07/02/14	Final	GL



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# 1. INTRODUCTION

- 1.1 This Planning Statement is submitted in support of a planning application on behalf of Pocket for the erection of a three storey building to provide a development of 17x one-bedroom self-contained dwellings including 13 affordable dwellings (C3 Use Class) with associated private amenity space, refuse storage and cycle parking at Oak Grove, Camden, NW2 3LR.
- 1.2 This Statement assesses the proposals against the policies within the Council's Development Plan and other material considerations which are relevant to the determination of the application. The Statement is structured as follows:
- Section 2 – summarises the Pocket model and the Mayor of London's Housing Covenant;
  - Section 3 – describes the site and the surrounding context;
  - Section 4 – sets out the planning history of the site;
  - Section 5 – details the proposed development;
  - Section 6 – describes the public consultation and community involvement exercises undertaken;
  - Section 7 – provides an overview of the relevant planning policies;
  - Section 8 – provides an assessment of the proposals against the relevant planning policies; and
  - Section 9 – provides the summary and conclusions.
- 1.3 The application is supported by, and should be read in accordance with, the following materials:-
- Design & Access Statement by HTA Architects;
  - Application drawings by HTA Architects;
  - Environmental Noise Survey and Noise Impact Assessment Report by Hann Tucker Associates
  - Train Induced Vibration and Assessment Report by Hann Tucker Associates
  - Daylight ,Sunlight and Overshadowing Assessment by XCO<sub>2</sub>
  - Energy Statement by XCO<sub>2</sub>
  - Sustainability Assessment incorporating Code for Sustainable Homes Pre-Assessment by XCO<sub>2</sub>
  - SiteCheck (Contamination) Review by RPS
  - Ecology Survey;
  - Draft Construction Management Plan (Contents) by Construction Planning Associates; and
  - Viability Appraisal (submitted confidentially).

## 2. POCKET AND THE MAYOR'S HOUSING COVENANT

### The Mayor's Housing Covenant

- 2.1 In September 2012 the Greater London Authority published the Mayor's Housing Covenant (MHC). The Mayor acknowledges that for many Londoners on modest incomes, London's current housing market is not working. Hard-working Londoners that occupy key positions in London's social infrastructure are often priced out of the private housing market and overlooked as a priority for scarce affordable rented accommodation. This forces these Londoners to look outside the boroughs they work in and contribute to, increasing their commuting times and removing them from their local communities.
- 2.2 The Mayor recognises that the mid-market offer for these people must be addressed through the provision of more flexible housing products. The alternative is that London risks losing a significant proportion of its skilled workforce, to the detriment of London's economy and social fabric.
- 2.3 The Mayor's Housing Covenant will make available up to £100 million to stimulate the supply of intermediate housing. This will help an initial 10,000 Londoners and establish a ten-year revolving fund so that this investment can continue to help future generations onto the housing ladder.
- 2.4 The Mayor of London has put Pocket at the forefront of delivering the housing he seeks through his Housing Covenant, awarding Pocket a £21.7 million loan to develop more affordable homes across London over the next ten years.

### Pocket

- 2.5 Pocket is an award-winning developer that provides a unique type of intermediate affordable housing to Londoners on low to moderate incomes. Pocket homes are specifically targeted at those Londoners who help to make London a world class city, but fall between the social housing and private housing markets. Pocket provides these people with an opportunity to own their own home and eventually move up the housing ladder.
- 2.6 Pocket homes are on a 100% equity basis, and with no public subsidy. Sales prices are set 20% below market levels, and capped at a level equivalent to 3.5x the Mayor of London's maximum household income threshold for intermediate affordable housing eligibility.
- 2.7 Through its lease conditions and provisions in the Section 106 Agreement, Pocket ensures its homes remain affordable in perpetuity. This distinguishes them from shared ownership homes, whose buyers can over time acquire additional equity (so-called "staircasing") until they own 100% and the home ends up on the open market. In addition, buy-to-let is excluded through the lease conditions and strict checks are carried out to prevent sub-letting.
- 2.8 Pocket homes are affordable to mid-market buyers because of the way they are designed. They are smart, compact dwellings, typically of 38m<sup>2</sup>, aimed at single-occupancy living. The small size enables them to be built to a high-quality specification with low maintenance costs and low service charges.



- 2.9 Pocket developments attract like-minded people who create their own communities. They are sustainable and Lifetime Homes compliant, and include high-quality amenity areas.
- 2.10 Pocket's first completed development was in the London Borough of Camden won a Camden Building Quality Award, was highly commended in the Evening Standard New Homes Awards and shortlisted for the National Housing Design Awards in 2009. It also received a Building for Life Silver Standard Award.
- 2.11 Pocket's recently completed development in the City of Westminster won the RIBA 2013 London Regional Award, the RICS London 2013 Residential Award and was Best Development in the Affordable Homes Sector at the Evening Standard Homes and Property Awards 2012.

### 3. SITE AND SURROUNDING CONTEXT

- 3.1 The application site is a parcel of land on the eastern side of Oak Grove, between the junctions with Richborough Road and Ash Grove. The site is located in the north of the borough; the site's northern boundary is also the dividing boundary line between the London Boroughs of Camden and Barnet (to the north). The rear of the site is flanked (to the east) by the Thameslink railway lines which run north from St Pancras Station through to Cricklewood Station, which is located within close proximity to the site.
- 3.2 The site is currently vacant but was formerly occupied by a commercial building (a small wig factory) set back in to the site, near to the railway embankment. This building was demolished circa 2003 pursuant to an outline planning permission to redevelop the site for residential purposes (ref: PWX9902510). The site has been most recently used use informally for car parking although this use has now ceased.
- 3.3 The immediate surrounding area is predominantly residential, characterised by a mix of 2-3 storey houses and flats. The adjacent building to the north of the site is in use as a car repair workshop. It is the only light industrial use in the street (and falls within LB of Barnet).
- 3.4 The building to the south of the application site is in residential use. The application site area extends around the rear of this building.
- 3.5 A portion of the rear of the site is designated as a Site of Nature Conservation Importance (site 262; Railway Embankment to rear of Fordwych Road). As illustrated on the accompanying plans the designation relates only to the rear part of the site which is currently hardstanding.
- 3.6 The site is not within a Conservation Area and there are no listed buildings nearby.
- 3.7 The PTAL rating of the site is 4.

## 4. THE SITE'S PLANNING HISTORY

- 4.1 The site has a long planning history dating back to circa 1950. For the purposes of this application we consider the planning history since 2000, detailed below, is most relevant.

Reference:	Description:
<b>2008/5169/P</b>	The Development Control Committee <b>resolved to grant</b> planning permission for erection of building comprising ground, first and second floor level to provide 7 self-contained flats (4 x 1-bedroom, 3 x 2-bedroom) and 2 townhouses (1 x 3-bedroom and 1 x 5-bedroom) in October 2009. However the s106 agreement was not completed and the application was <b>withdrawn</b> .
<b>2007/5980/P</b>	Application submitted on 21 November 2007 for redevelopment of the vacant site by the erection of a three storey residential block comprising 14 apartments and space for underground car parking. The application was <b>withdrawn</b> on 30 January 2008 following concerns raised by officers regarding the impact on neighbour amenity, car and cycle parking.
<b>2006/3085/P</b>	Application submitted on 16 April 2007 for redevelopment of the vacant site by the erection of a 3-storey building to provide 14 self-contained flats with basement car parking. The application was <b>withdrawn</b> on 13 July 2007 following concerns raised by officers regarding the impact on neighbour amenity, car and cycle parking.
<b>PW9902510</b>	Outline planning permission <b>granted</b> on 22 June 2000 for demolition of the existing Class B1 buildings and redevelopment of the site for residential use. Permission was not implemented.

- 4.2 It has previously been established through the approval of outline permission in 2000 and the resolution to grant permission in 2009 that residential use of the site is acceptable in principle. Both these previous decisions are material considerations in any future planning application for development of the site.
- 4.3 The lengthy planning history also demonstrates the difficulties in delivering a sustainable development on the site. Pocket is a developer that specialises in developing such sites.

## 5. THE PROPOSED DEVELOPMENT

- 5.1 The proposed development is for the erection of a new three-storey building to provide 17x 1-bedroom self-contained dwellings including 13x affordable dwellings (Pocket homes). The principal elevation of the new building will form a new street edge on the site. As shown on the accompanying drawings, this will be consistent with the established building line to the north of the site.
- 5.2 The proposed building is rectangular. At the northern end of the site, the proposed rear building line will extend slightly further back, creating a return, in order to accommodate the internal refuse storage area on the ground floor level and building stair core.
- 5.3 The extension of the building footprint in this area encroaches slightly upon the designated SNCI, however it is considered that the quality of the SNCI land within the site is poor and as the scheme would contribute an overall improvement to the SNCI this minor loss is acceptable.
- 5.4 Of the 17 dwellings proposed, 13 would be affordable dwellings provided through the Pocket homes affordable housing model as set out within Section 2 of this Statement. The remaining 4 dwellings would be for private sale. These are required to subsidise the delivery of the affordable homes. A viability appraisal is provided to demonstrate that these dwellings are required from a viability perspective.
- 5.5 The proposed development will provide a landscaped private amenity space for residents to the rear of the site.
- 5.6 Full details of the proposals can be found in the accompanying Design and Access Statement and accompanying scheme drawings from HTA Architects.

## 6. PUBLIC CONSULTATION AND COMMUNITY INVOLVEMENT

- 6.1 Pocket has carried out consultation on the proposed development in two ways; through engaging the London Borough of Camden's pre-application advice service, and by consultation with local residents.

### **Formal Pre-Application Advice**

- 6.2 Pocket submitted detailed proposals for pre-application advice, using the Council's formal pre-application advice service. The pre-application submission was for a proposed development of up to 4 storeys to provide 20 dwellings.
- 6.3 A pre-application meeting was held with the Council's Principal Planning Officer and Conservation and Design Officer on 13<sup>th</sup> December 2013. Written advice was received dated 23<sup>rd</sup> December 2013.
- 6.4 Officers confirmed that the principle of residential development at the site had been established through the planning history and this was not disputed. Officers understand the Pocket model and agree that the Pocket housing model receives Mayoral support and is considered to be affordable housing under the London Plan. The recent grant is a clear sign of Mayoral support for the model.
- 6.5 Officers acknowledged that whilst the proposed development provides an innovative form of affordable housing and that the delivery of low-cost Pocket housing contributes to meeting housing need as set out in Policy CS6, justification for the homogenous mix of dwellings would be required. Justification for the proposed unit mix is provided at Section 8 of this Statement.
- 6.6 Affordability would need to be secured in perpetuity (i.e. including from onwards sales) through s106 obligations.
- 6.7 Officers commented on the detailed design of the development including the bulk and massing, footprint and elevational details. Officers considered the proposed 3<sup>rd</sup> floor was inappropriate. The proposals have been amended accordingly. Details of the scheme's design evolution in response to officer comments can be found in the accompanying Design and Access Statement from HTA Architects.
- 6.8 Other discussions included subjects such as amenity, daylight and sunlight, contamination and s106 requirements.

### **Public Consultation**

- 6.9 A public consultation event was held on 17<sup>th</sup> December. 168 flyers were delivered on 5<sup>th</sup> December inviting local residents to the event.
- 6.10 Four local residents attended the consultation, along with Councillor Nancy Jirira. The feedback was generally supportive of the proposals.

- 6.11 Some local residents felt that the site was not being used to its potential being left vacant, and recorded that it had been subject of fly-tipping. Residents were generally satisfied with the design of the new building.
- 6.12 Residents also raised some concerns about the proposals. The density of development was raised by some residents, particularly in relation to the potential for parking impacts to be caused. We explained to residents that the development would be car-free.
- 6.13 Residents explained that their homes are subject to vibration from passing trains, and that any new homes would experience similar impacts. We have explored this matter and commissioned an independent vibration assessment.
- 6.14 A range of potential amenity impacts were discussed. Potential overlooking to neighbouring properties was discussed by some residents. The potential for overlooking impacts has been considered through the design process. Potential impacts on light (to nos. 58 and 60 Oak Grove) were raised as potential concerns. We have assessed these potential impacts and are satisfied there will be no significant daylight impacts.
- 6.15 Residents were concerned about potential impacts arising from construction. We explained to residents that construction would be subject to a management plan that would control impacts as much as practicable.
- 6.16 Residents would prefer that refuse storage for the new flats was provided within the site. This has been incorporated into the designs.

## 7. RELEVANT PLANNING POLICIES

- 7.1 Section 38(6) of the Act states that applications must be determined in accordance with the relevant development plan, unless material considerations indicate otherwise. The development plan for London Borough of Camden comprises the Council's adopted Core Strategy (2010), the Development Policies (2010), the Camden Planning Guidance and the London Plan (2011).
- 7.2 Although the National Planning Policy Framework (2012) does not alter the statutory status of the development plan as the primary consideration in the determination of a planning application, it provides national guidance, conveys the government's intentions for the planning system and is a material consideration in the determination process.

### **National Planning Policy Framework (2012)**

- 7.3 The National Planning Policy Framework sets out the Government's objectives for the planning system; to achieve sustainable development through economic, social and environmental gains, and to secure economic growth.
- 7.4 The presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision-taking, involves seeking positive improvements in the quality of the built, natural and historic environments including replacing poor design with better design, improving the conditions in which people live, and widening the choice of high quality homes.
- 7.5 Paragraphs 49 and 40 of the NPPF state that housing applications should be considered in the context of the presumption in favour of sustainable development. To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).
- 7.6 National Planning Policy Framework Annex 2: glossary defines Affordable Housing in the following terms:

"Affordable housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

...Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing."

- 7.7 Pocket's affordable homes will all qualify as affordable housing under this definition (as opposed to so-called 'low-cost' market housing) because they will satisfy the three key criteria:
- Restricted eligibility – all buyers must have a household income below the Mayor's maximum household income threshold for eligibility for affordable housing schemes.
  - Provisions to remain at an affordable price – the lease of Pocket homes will include conditions that oblige owners to follow the same eligibility rules when selling (or renting – in exceptional circumstances) their home.
  - Cost below market levels – pricing is agreed with boroughs before units are released onto the market.

## **Regional Planning Policies**

### *London Plan 2011*

- 7.8 The London Plan was adopted in July 2011. It provides the strategic policy context for London.
- 7.9 The document sets out policies to ensure an adequate supply of housing for the city's projected population growth.
- 7.10 Policy 3.1 seeks to ensure equal life chances for all. The Mayor is committed to ensuring equal life chances for all Londoners. Meeting the needs and expanding opportunities for all Londoners – and where appropriate, addressing the barriers to meeting the needs of particular groups and communities – is key to tackling the huge issue of inequality across London.
- 7.11 The policies in the London Plan are consistent with the thrust of the policies within both national and regional planning guidance in recognising the need for high density housing particularly affordable housing on previously developed sites.
- 7.12 Policy 3.3 Increasing Housing Supply states that the Mayor will seek to ensure the housing need is met, particularly though the provision consistent with at least an annual average of 32,210 net additional homes across London.
- 7.13 Table 3.1 sets out the Borough Housing Targets. Boroughs should seek to exceed the relevant minimum annual average housing targets. This is a minimum of 6,650 new homes within Camden over a 10 year period and 665 new homes annually.
- 7.14 Table 3.2 Density Matrix provides guidance on the range of housing densities with regard to location and is a tool for increasing density in situations where transport proposals will change the public transport accessibility ranking. Policy 3.4 seeks to maximise the potential for sites.
- 7.15 Policy 3.5 Quality and Design of Housing Developments states that housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in the Plan to protect and enhance London's residential environment and attractiveness as a place to live. Policy 3.5 refers to the minimum space standards but states: 'Development proposals which compromise the delivery of elements of this policy may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan'.



- 7.16 Policy 3.8 Housing Choice seeks that new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups, all new housing is built to 'Lifetime Homes' standards and ten per cent of new housing is designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.
- 7.17 Policy 3.9 Mixed and Balanced Communities states that communities mixed and balanced by tenure and household income should be promoted across London through the incremental small scale as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for their neighbourhoods.
- 7.18 Policy 3.10 Definition of Affordable Housing sets out the Mayor's definition of affordable housing. Affordable housing comprises social rented and intermediate housing. The recently published Revised Early Minor Alterations to the London Plan (October 2013) revises the definition of intermediate affordable housing to:
- "intermediate housing is homes available for sale or rent at a cost above social rent, but below market levels. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rent. Households whose annual income is in the range £18,100- £66,000 should be eligible for new intermediate homes. For homes with more than two bedrooms, which are particularly suitable for families, the upper end of this eligibility range will be extended to £77,200. These figures will be updated annually in the London Plan Annual Monitoring Report."
- 7.19 Paragraph 3.65 states that LPAs should take into account the way the provision of intermediate housing can extend the effectiveness of scarce public resources by increasing overall housing output through partnership working with the public sector.
- 7.20 The Revised Early Minor Alterations also alters policy 3.11 (Affordable Housing Targets). Policy 3.11 states that affordable housing provision should be maximised, and that an average of at least 13,200 more affordable homes are delivered per year in London over the term of the Plan. In order to give impetus to a strong and diverse intermediate housing sector 40% of the affordable housing provision should be for intermediate rent or sale.
- 7.21 Derivation of separate targets for social/affordable rented and intermediate housing has been informed by the SHMA and other relevant factors. These include the role intermediate housing can play in helping Londoners get a first step on the housing ladder, reducing the call on social/affordable rented housing, freeing up social/affordable rented homes, providing wider housing choices and securing a more balanced social mix on mono-tenure estates. Account has also been taken of the way intermediate housing development can extend the effectiveness of scarce public resources by increasing overall housing output through partnership working with the private sector.
- 7.22 In light of announced investment patterns and the Government's intention that affordable rent should meet the same housing needs hitherto addressed by social rented housing, the Mayor proposes that as a long term strategic target 60 per cent of new affordable housing should be for social/affordable renting, especially for families, and that 40 per cent should be for the range of intermediate housing products outlined in the London Housing Strategy to meet different needs, including those arising from groups which hitherto have not been able to afford market housing but

have been excluded from intermediate housing. The Mayor recognises that these are challenging targets, particularly in current economic conditions, but to meet Londoners' housing needs all stakeholders must engage to achieve them over the term of the Plan.

### **Local Planning Policies**

#### *London Borough of Camden Core Strategy (2010)*

- 7.23 LB Camden has adopted its Core Strategy. The Core Strategy sets out the key elements of the Council's planning vision and strategy for the Borough. The overall vision of Camden's Core Strategy is to create a borough of opportunity. The vision includes four themes which aim to make sure that Camden adapts to a growing population; has an economy that includes everyone; is connected where people can live active, healthy lives; and a safe Camden that is a vibrant part of our world city.
- 7.24 Core Strategy Policy CS1 aims to distribute growth to the most suitable locations and manage it to make sure that opportunities and benefits are delivered in order to achieve sustainable development. The Council recognises that it has limited land and to make the most efficient use of land and buildings it will concentrate the majority of growth within the defined Growth Areas, and direct appropriate development at other highly accessible locations. In adopting this approach, the Council's intention is to provide 12,250 additional homes up until 2024.

#### *London Borough of Camden Development Policies (2010-2025)*

- 7.25 Camden's Development Policies Document sets out the detailed guidance and policies to enable the Borough's broader objectives as set out within the Core Strategy to be achieved. The development policies are grouped in to the four themes as identified within the Core Strategy.

#### *Camden Planning Guidance*

- 7.26 Camden has adopted eight Planning Guidance (CPG) documents which cover a variety of topics such as design, housing, amenity and transport.
- 7.27 Detailed policies and guidance from the above documents are assessed in Section 8 below.

## 8. ASSESSMENT OF THE PROPOSALS

- 8.1 This section demonstrates that the development complies with the Development Plan. It assesses the principle of the development and its potential impacts against the aims and objectives of the Development Plan.

### **Principle of Development**

- 8.2 The proposed development would involve the erection of a new three-storey residential building on the site to provide 17x 1-bedroom dwellings; 13x dwellings will be affordable dwellings as per the Pocket housing model and 4 would be for private sale. The private dwellings are required to subsidise the delivery of the affordable housing-led development. We have submitted a viability appraisal that demonstrates that the private units are necessary to enable delivery of the affordable housing-led development.
- 8.3 The site is currently vacant and unused, but it was most recently used for the informal storage and parking of cars. This low-intensity use does not constitute a sustainable use of highly-accessible brownfield land.
- 8.4 We recognise Camden Council and the Mayor of London's policies that seek to discourage the use of private motor vehicles, especially in London's more accessible locations. We consider that in this context, any objection on the basis that the site is currently used for parking would be inconsistent with the general policy approach of promoting the use of sustainable modes of travel and providing new homes.
- 8.5 We therefore consider the need to provide new housing as set out in Core Strategy Policy CS6, and the need to make the best use of Camden's capacity for housing (Policy DP2) outweighs any imperative to protect the land for its current use.
- 8.6 We also recognise the site's lengthy planning history which establishes that the principle of residential use is acceptable on the site and that the site's historical employment use is not a significant consideration.

### **Residential Policies**

- 8.7 The proposed development would need to be considered against a number of adopted Core Strategy and Development Management Policies.

### *Principle of Housing*

- 8.8 Housing is the priority land use of the Core Strategy and the other documents of the Local Development Framework (Core Strategy Paragraph 1.8, Policy CS6e). Policy CS6 seeks to maximise the supply of housing. It sets demanding targets for the delivery of new housing in the borough, with particular emphasis on the delivery of affordable housing and seeks a borough-wide target of 50% of all housing to be affordable housing.
- 8.9 The proposed development provides a housing scheme with 76.45% affordable dwellings, 26.5% more than the policy requirement, and therefore complies with Policy CS6.

- 8.10 Paragraph 6.29 of the supporting text recognises the importance of creating mixed and inclusive communities. The Council seeks to achieve this by seeking a range of housing types suitable to households and individuals with different needs, and the supporting text lists a range of housing types which includes “homes affordable to individuals and households across a range of incomes”. Pocket housing meets the aims of the policy by providing a specific housing product that is tailored to those that are priced out of the private housing market and overlooked by social housing, and is 100% owned by the buyer.
- 8.11 Paragraph 6.32 also acknowledges this need in the market; it recognises that the split between affordable housing and market housing will not necessarily secure housing suitable for households across the full range of incomes, and that middle-income households could be excluded from Camden, creating social polarisation between low income households in social rented accommodation and high income households in owner-occupation.
- 8.12 Paragraph 6.33 recognises that intermediate affordable housing is intended to bridge the gap between social rented housing and market housing. For intermediate housing to tackle social polarisation effectively, it needs to be attractive to a range of household types across a range of incomes, including those that aspire to own their own home and those that can only afford to rent. The Council’s policy therefore supports a variety of different types of intermediate housing, and positively considers proposals to provide low-cost market housing through innovative funding arrangements, designs and methods of construction. Pocket homes thereby meet the aims and objectives of the policy as a means of mitigating the impact of high-cost home ownership in the borough.
- 8.13 Policy DP2 of the Development Management Policies (Making full use of Camden’s capacity for housing) echoes the aims of Policy CS6; to maximise the supply of additional homes in the borough. It seeks the maximum appropriate supply of housing on sites that are under-used or vacant and resists alternative development of sites that are considered particularly suitable for housing, particularly affordable housing. As discussed above, this site is under-used and is suitable for housing; it is in a residential area and has a history of residential permissions. The proposed development complies with policy DP2 in that it would provide the maximum appropriate use of the site for housing.
- 8.14 The density of the proposed development would be 556hr/ha, which is within the density range set out in the London Plan for a site of this nature (urban setting, PTAL > 4). The Council resists development densities that are below the appropriate range given in the London Plan density matrix or below the density of the surrounding area.

### *Affordable Housing*

- 8.15 Policy DP3 (Contributions to the supply of affordable housing) expects all developments of 10 units or more to contribute to the borough’s supply of affordable housing. The proposed development complies with the policy by providing 13 dwellings for affordable housing (76.5%). Paragraph 3.23 states that “the Council welcomes proposals for development led by affordable housing which will make a major contribution towards our borough-wide 50% affordable housing target.
- 8.16 The supporting text states that schemes are considered to be affordable housing-led if they provide substantially more than 50% affordable housing. Although the guidelines in policy CS6 of 60% social rented and 40% intermediate affordable housing will generally apply, schemes led by affordable housing may exclude social rented or intermediate housing where this is warranted.

- 8.17 The policy also acknowledges that some forms of intermediate affordable housing require limited or no public subsidy, but are still offered for rent or sale at prices that are affordable compared with self-contained flats for the general market. The Council recognises that proposals for affordable housing-led developments of this type may be financially viable on some sites, and be acceptable in terms of the criteria in Policy DP3. The proposal would provide 76.5% affordable dwellings (intermediate affordable housing) and is thus affordable housing-led.
- 8.18 The affordability of Pocket housing is discussed above at Section 2. The affordability is secured in perpetuity through the s106 agreement and leases on sales of properties, and buy to let purchasers are restricted. A draft s106 agreement that includes the affordability clauses is included with the application.
- 8.19 It should also be recognised that the Mayor of London has confirmed that Pocket housing benefits from relief from his Community Infrastructure Levy on the grounds that it is a form of affordable housing as defined by the NPPF.

#### *Mix of Dwellings*

- 8.20 Policy DP5 relates to the mix of dwellings provided within a proposed development. The policy seeks a range of dwelling sizes in developments, but the policy acknowledges that compliance with the Dwelling Size Priorities Table will not always be possible. The Council will therefore be **flexible** when assessing development against Policy DP5. The supporting text to policy CS6 (paragraph 6.29) also refers to the need to provide a mix of dwellings in developments. However paragraph 6.31 acknowledges that it will not be feasible to include a full range of homes wide enough to meet all needs within every development.
- 8.21 The proposed development does not comply with the aspirations of the policy as set out in the Dwelling Size Priorities Table, which for intermediate affordable housing seeks a higher provision of 2-bed+ dwellings than one-bed dwellings.
- 8.22 It must be recognised that Pocket developments are affordable because they provide a certain quantum of dwellings on a small site. The uniform mix of one-bedroom dwellings is a key element in ensuring the developments are viable and affordable. We therefore recognise that from the outset, Pocket developments require an exception to be made to dwelling mix policies which are common in their intent to Development Plans across London boroughs.
- 8.23 We consider that an exception to policy DP5 is warranted on the grounds that other considerations – namely the provision of a large number of affordable high-quality dwellings on a site that would otherwise deliver a significantly lower number of dwellings, with a very small contribution to affordable housing – outweigh the need to ensure that the site delivers a mix of dwellings of all sizes.
- 8.24 It should also be recognised that the supporting text at Para 5.7 states that the Council will be **flexible** when assessing development against Policy DP5, the dwelling size priority table, and the aims set out in paragraph 5.5. The policy text states that *“the mix of dwellings sizes appropriate in a specific development will be considered **taking in to account the character of the development, the site and the area.**”*
- 8.25 Supporting policy text under Para 5.14 also recognises that the Council *“may vary the range of home sizes sought in order to maximise housing delivery”*. Para 5.15 recognises that *“the **rigid***

***application of dwelling size priorities can prejudice the financial viability of a development*** and *“will consider the appropriate mix of dwellings having regard to their value and the potential to maximise the proportion of affordable housing on the site.”*

- 8.26 Furthermore it is recognised that the demographics of the population are changing; between 2006 and 2031 household growth is projected to increase from 21.5m to 27.8m of which 65% (i.e. 4.1m) will be one-person household growth (source: ONS). The vast majority of buyers of Pocket homes are singles and couples (without children) looking to get away from renting, with 80% of the purchasers to date being single persons. This buyer demographic is likely to be consistent with the Council’s further policy text under Para 5.16 which recognises that larger market and intermediate affordable homes may be too expensive for many households who need large homes. Pocket buyers, who are predominantly singles and couples, require smaller homes that are cheaper. Pocket tailors their approach to meet this demand for 1-bedroom dwellings. The Council’s policy text at Para 5.16 (Policy DP5) recognises this scenario. *“The Council also recognises market housing and intermediate affordable housing will often be too expensive for many households who need large homes”.*
- 8.27 Pocket targets buying small sites in highly accessible areas which are also the areas that singles and couples are looking to locate to. By designing smaller one-bed homes in these accessible urban locations Pocket is meeting this demand from singles and couples. Proof of the need for Pocket’s one-bedroom homes can be seen by the fact that over 13,000 people have expressed an interest in buying a Pocket Home. Viability is also a consideration. If Pocket was forced to build larger two and three bed homes it would have a detrimental impact on the delivery of affordable homes across London. Larger homes (e.g. two-bed dwellings) would cost more to build, but the two-bed dwelling could not be sold for more than the capped price for a one-bedroom flat. The two-bed flat would be built at the expense of floorspace available for other one-bed dwellings, but with no way of recovering that value. This can dramatically affect viability.
- 8.28 The development includes 4x one-bed market homes, which are needed to enable deliverability of affordable homes on the site. For market homes, the Dwelling Size Priorities Table also states that the Council places higher priority on dwellings that are larger than one-bedroom and seeks that at 40% of private dwellings be two-bedrooms or more.
- 8.29 Provision of a policy-compliant mix in the private dwellings would have significant knock-on effects on scheme viability. We consider that given the low number of private dwellings in the development, and recognising they are provided in the context of a Pocket development where the unit mix is homogenous, that the 4 x one-beds is an acceptable mix of dwellings.
- 8.30 Matters of affordability, tenure split and mix of dwellings must also always be considered in the context of the London Plan. The London Plan contains policies that address these matters as set out in Section 7 above; London Plan Policy 3.3 seeks to increase housing supply; Policy 3.8 relates to housing choice and mix of dwellings; Policy 3.9 relates to mixed and balanced communities and refers to housing tenure; Policies 3.10, 3.11 and 3.12 relate to affordable housing. The Mayor of London has endorsed the Pocket housing model and has provided Pocket with funding, via his Housing Covenant, to deliver their very specific type of housing in recognition of the need for low-cost housing for those Londoners that cannot get onto the bottom rung of the housing ladder, always recognising that Pocket’s model delivers 1-bedroom dwellings.

## **Amenity**

- 8.31 Core Strategy Policy CS5 states that the Council will protect the amenity of Camden's residents and those working and visiting the borough by (*inter alia*) making sure that the impact of development on occupiers and neighbours is fully considered. This aim is addressed in greater detail by Policy DP26.
- 8.32 The scheme has been designed with the amenity of the proposed occupiers and neighbours of the site in mind, recognising that the site shares a boundary with the residential building to the south.
- 8.33 It must always be recognised when considering amenity impacts that the site is in an urban location where there is a dense pattern of development, as illustrated in the accompanying Design and Access Statement and massing study drawings.
- 8.34 While the site, which is currently vacant, has a very low level of impact on the amenity of neighbours, the site is not in a sustainable use and there is a clear imperative that the site be brought forward for development. The appropriate form of development must recognise the urban grain of the area and a suitable desired density of development commensurate with the site's accessibility and location.
- 8.35 Amenity considerations as set out in Policy DP26 are addressed in turn below.

### ***Visual Privacy and Overlooking***

- 8.36 As per Camden Planning Guidance Note 6 (CPG6), the proposals have been designed with great care in order to ensure that the proposed development would not give rise to any overlooking of directly facing habitable windows within a distance of 18m. This is complied with, as demonstrated in the accompanying Design and Access Statement.
- 8.37 The pair of semi-detached houses directly opposite the site across Oak Grove contain windows facing the site; however they are at a distance of 18m away from the windows within the proposed principal elevation of the new building.
- 8.38 The southern flank wall of the proposed building does not contain windows to habitable rooms. A single window positioned centrally within the elevation, on each of the upper floors allows light in to the internal corridor. Therefore none of the existing windows in the north facing elevation of 19 Richborough Road would be overlooked by the development.
- 8.39 The windows to habitable rooms within the proposed building either face across Oak Grove, or to the rear across the railway embankment. None of the proposed habitable windows would be overlooked by existing windows at neighbouring properties within a distance of 18m.

### ***Overshadowing and Outlook***

- 8.40 The proposed layout has been designed to ensure that the new building will have the minimum impact on the amenity of residential neighbours. The height and massing of the proposed development has been designed to minimise impacts on the outlook of neighbouring properties, whilst also recognising the pattern of development and urban grain in the area, and its accessible location.

- 8.41 The accompanying Design and Access Statement demonstrates that distances between buildings are reasonable.

#### ***Daylight and Sunlight***

- 8.42 A Daylight, Sunlight and Overshadowing Assessment (DSO) prepared by XC02 Energy accompanies this planning application. The DSO has been prepared in accordance with the British Research Establishment's Site Layout Planning for Daylight and Sunlight.
- 8.43 It assesses the daylight, sunlight and overshadowing impacts of the proposed development on the existing properties and open spaces surrounding the site. Please refer to the DSO for more detail.
- 8.44 The DSO indicates that the impact on surrounding properties arising from the development will be within acceptable limits for an urban location, always recognising the status of the BRE Guide as guidance. It is considered that the proposed development is unlikely to result in a significant harmful impact on daylight access to the surrounding properties or the amenity of neighbours.

#### ***Construction-related Impacts***

- 8.45 We recognise that any development of the site will result in impacts on the amenity of neighbours during demolition and construction. Impacts include noise, odour, dust, fumes, and traffic generation. It is impossible to avoid some of these impacts but it is possible to put measures in place to ensure any such impacts are mitigated.
- 8.46 A Draft Construction Management Plan is being prepared to submit for the Council's assessment. We have provided the headline points that the draft CMP will address to ensure that impacts on the amenity of neighbours are minimised during construction.
- 8.47 A full detailed CMP will be provided prior to the determination of the application and we anticipate a planning condition to require that construction be carried out in accordance with the approved CMP.

#### ***Standard of Accommodation***

- 8.48 Policy DP26 requires that developments provide an acceptable standard of accommodation in terms of internal arrangement, dwelling and room sizes and amenity spaces. To support the policy the Council has adopted CPG6 which includes (*inter alia*) guidance on dwelling sizes and amenity space. It must always be recognised that the guidance is intended to help inform decisions and not to be slavishly applied to developments. It is subordinate to the policy and the aims of the policy must always be in mind when it is applied. The aim of the policy is to ensure an acceptable standard of accommodation.
- 8.49 At 38m<sup>2</sup>, Pocket homes exceed the floorspace requirements set out in the adopted CPG2 (Housing) for a one-person dwelling. They also comply with the minimum floorspace standards for a one-person dwelling as set out in Policy 3.5 of the London Plan. 80% of Pocket homes are occupied by people living alone.
- 8.50 CPG2 seeks 48m<sup>2</sup> for a one-bedroom two-person dwelling. While Pocket homes are below this amount, Pocket homes are designed extremely well, as demonstrated in the accompanying Design and Access Statement and the numerous awards they have won. They are also designed using a standard layout which ensures consistency of quality. They are not squeezed into the corners of buildings with awkward layouts.



- 8.51 Consequently, while the dwellings are below Camden's guidance for a two-person flat, it cannot be said that they do not provide an acceptable standard of accommodation. It should also be recognised that paragraph 4.18 of CPG2 states that "*self-contained homes providing a floorspace below the minimum standards may be considered in exceptional circumstances, for example to reduce the cost of Intermediate Housing to the occupier*".
- 8.52 As well as being exceptionally high-quality in terms of internal layouts, the dwellings have external storage space suitable for household items. The proposed development provides a communal amenity space on site
- 8.53 All dwellings would comply with Lifetime Homes.

### **Transport**

- 8.54 The proposed development would not cause any significant impacts to on-street parking conditions by displacement of the existing informal parking use of the site.
- 8.55 The transport impact of the proposed development would be very minor. The development would be car-free, which is appropriate in this accessible location where there is a high PTAL of 4. The likely transport impacts are therefore very low. Each dwelling would be allocated a secure cycle space in a dedicated cycle store.

### **Sustainability**

- 8.56 The application is accompanied by a Sustainability Statement which demonstrates that the proposed development addresses the Council's sustainability policies, and includes a Code for Sustainable Homes Pre-Assessment.
- 8.57 The CfSH Pre-Assessment has found that the total development achieves a number of credits sufficient to exceed Code Level 4, and more than 50% of credits are achieved under the Energy, Water and Minerals categories. It is considered that the proposal is in accordance with the Council's sustainability policies within the Development Plan.

### **Contamination**

- 8.58 RPS has prepared a SiteCheck Review of the site that considers that further investigations would be required to determine the risks from contamination. Clancy Consulting has been liaising direct with Camden's Environmental Health Officer about a written scheme of investigation for the site which would establish the level of contamination and what, if any measures were required to address contamination such that development could be implemented without risk to health.

### **Ecology**

- 8.59 The application is accompanied by an Ecological Appraisal prepared by ACD. The Appraisal considers the ecological impact of the proposals upon the designated SNCI, which covers approximately one third of the total development site.
- 8.60 The Ecological Appraisal raises potential concern about impacts on nesting birds that could occupy shrubs on the site. However these shrubs are being removed imminently as part of the site clean-up (NB works done outside the nesting season). There is therefore no potential impact on birds.

- 8.61 The proposed development would only encroach upon a small area of the SNCI, which is currently hard standing with a negligible ecological value. The impact of the encroachment of the built development upon the SNCI is therefore likely to be of negligible impact overall.
- 8.62 It is recommended that to enhance the ecological value of the SNCI, wildlife friendly planting is incorporated within the landscape proposals for the communal amenity area. The accompanying Design and Access Statement from HTA illustrates how such planting could be incorporated into the scheme.
- 8.63 The Appraisal concludes that implementing the mitigation and enhancement recommendations will ensure that there are no significant impacts upon protected species and that the proposals will be in conformity with relevant legislation and planning policy.
- 8.64 Overall, while the development would result in development on a small area of land designated as a SNCI, it would have net benefits in terms of ecological value. The impact on the small area of built footprint on the SNCI's function as a wildlife corridor would be negligible, and would be outweighed by the benefits provided by improved planting to the site.
- 8.65 It should also be recognised that the development previously resolved to be approved also encroached onto the SNCI land.

#### **Acoustic and Vibration Impacts**

- 8.66 The proposal is for residential development in a predominantly residential area. The proposals do not include any noise-generating external plant or machinery. There is no reason to suggest the development would cause any impacts on the amenity of neighbouring properties due to noise, and Pocket would accept a planning condition that ensures that no noise from the development impacts on residential neighbours.
- 8.67 The proposed development site adjoins a railway line. There are therefore potential impacts from noise and vibration on the proposed development,
- 8.68 Hann Tucker Associates have prepared an Environmental Noise Survey and Vibration Assessment to accompany the application. The Noise Survey concludes that the dwellings can achieve acceptable noise criteria.
- 8.69 The Vibration Study concludes that the impacts of passing trains on the elevated railway adjoining the site would be below Camden's established criteria. It acknowledges that predicted noise impacts of re-radiated noise exceed the standards set out in the relevant criteria and that installation of vibration mounting is given consideration. However the variation to the standards is minor and we do not consider anti-vibration mounts are necessary.

## 9. CONCLUSION

- 9.1 The proposed development would see an un-used, vacant brownfield site in a highly- accessible location brought back into sustainable use for affordable housing.
- 9.2 The scheme provides 17 new dwellings within the borough of which 76.47% (13) are 100% affordable intermediate housing, ideal for those Londoners who cannot afford homes on the open market. While the type of housing proposed is unconventional in terms of unit mix and unit sizes, it is endorsed by the Mayor of London who is supporting Pocket as a partner developer in delivering new housing through his Housing Covenant.
- 9.3 The proposal would significantly improve the local environment, while ensuring that impacts on neighbouring residents are minimised. The proposed development complies with the Council's Development Plan.
- 9.4 It is considered that the application represents sustainable development. In the absence of any adverse impacts that would significantly and demonstrably outweigh the benefits of the proposal, it is considered appropriate to grant planning permission in accordance with the NPPF's presumption in favour of sustainable development.





# Boyer

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