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21224/A3/AO/AC

For the attention of Ms Elaine Quigley

5 September 2013

Dear Madam

142-150 ARLINGTON ROAD, LB CAMDEN LPA REF. 2013/3487

We write on behalf of A2 Dominion ('the Applicant') and with regard to the above planning application submitted to the Council on 3 June 2013 and confirmed as valid from 28 June 2013.

We understand from officer's email of 5 August 2013 that comments from the Council's housing team are awaited. However, that officer's initial view is that, based on officers' application of Policy DP3, the scheme should provide 27% of the units as affordable which would equate to 6 units. The scheme currently provides 5, or 24%, of the units as affordable.

Policy DP3 identifies that affordable housing provision will be calculated on the basis of 'a sliding scale from 10% for developments with a capacity for 10 dwellings to 50% for developments with capacity for 50 dwellings'. Supporting paragraph 3.17 advises that affordable housing provision is calculated as a percentage of 'gross' floorspace.

Policy DP3 continues that:

'In calculating whether an affordable housing contribution should be sought, whether it can practically be made on site, and the scale and nature of the contribution that would be appropriate, the Council will also take into account:

.....

- b) *the character of the development, the site and the area;*
- c) *site size, and constraints on including a mix of market and affordable tenures....; and*
- f) *any other planning objectives considered to be a priority for the site'*



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Officer's email advises that the calculation of affordable provision should be based on 'gross external area'. Whilst the adopted Development Policies DPD 2010 does not clarify whether 'gross' relates to gross internal area (GIA) or gross external area (GEA), we understand that the Council have set out in non-statutory planning guidance document that affordable housing provision is to be calculated on the basis of GEA.

In the case of the current scheme, the GEA is 3,080 sq.m which, in accordance with officer's calculation, would equate to the need for 30.80%, or 6, of the units to be provided as affordable.

On the basis of the sliding scale, the scheme should provide an additional affordable unit on site unless other considerations, as identified in Policy DP3, direct that an alternative quantum would be appropriate.

Whilst there may be opportunities to reconfigure the three-bed affordable units to provide an additional unit to achieve the total of 6, this would result in a revision to the mix and a reduction in larger family units which the Applicant, as registered provider, and, we understand, the Council, would wish to avoid owing to the identified priority for affordable family units in this location. Indeed, the mix of the affordable units (3 no. three-bed, 1 no. two-bed and 1 no. one-bed) results from pre-application discussions with officers including a meeting with Housing Partnerships on 2 May 2013 at which the provision of 3 three-bed units in a scheme of this size was welcomed. Moreover, we consider the circumstances of the site to be such that it is neither practical or reasonable for additional affordable units to be provided on this site and that, in this respect, affordable housing provision should be considered in the context of parts b), c) and f) of Policy DP3.

The priority for this site has been to retain the majority of the existing building and sensitively convert and extend it to create 21 residential units. Whilst the layout of the building has been as efficiently planned as possible, the constraints of the existing building (including original wall thickness and the presence of pilasters), the need to retain key features (such as the large entrance opening from Arlington Road) and the large area of unusable basement, have resulted in unusually large circulation spaces and a below normal standard of net to gross floorspace. Moreover, the building does not benefit from any external space thus refuse and cycle storage facilities have been provided within the building. Therefore, whilst the GEA of the scheme is 3,080 sq.m, the saleable/ lettable floorspace within the residential apartments is 1,884 sq.m (GIA) which constitutes approximately 60% of the total floorspace.

In our view, the 5 high quality affordable units proposed, over half of which are provided as three-bedroom units suitable for families and all of which meet, and the majority of which significantly exceed, prevailing standards of internal space and amenity, would make a valuable contribution to affordable housing provision in this location. Whilst the affordable housing quantum at 5 units falls slightly below the target level of the sliding scale, in our view the specific constraints of the site are such that, in accordance with Policy DP3 and in the context of the high quality and desirable mix of the affordable units proposed, this is the maximum the scheme can reasonably provide.

We would wish to agree with officers the approach taken to affordable housing provision and look forward to confirmation along with the housing department's consultation comments on the proposals.

Should you have any queries please do not hesitate to contact the writer.



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